

26 November 2021

Mr D Keary
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Dear Mr Keary

**Planning Proposal – 250 Howick Street and George Street, Bathurst
Bathurst Integrated Medical Centre and George Street carpark**

Council has completed an assessment of the documentation provided and provides the following response, considering what it anticipates may be key information that is either missing or would support and strengthen the application particularly during its public exhibition.

The Planning Proposal seeks an amendment to the Bathurst Regional Local Environmental Plan (BRLEP) 2014 to increase the height and floor space ratio (FSR) standards to enable the construction of an Integrated Medical Centre and car park over and above the current height and FSR standards in the BRLEP. Critical to any Planning Proposal is an explanation of and justification for a change to these standards compared to the current planning standards in place.

Council seeks your consideration of the following matters before progression of the Planning Proposal to the Department of Planning, Industry and Environment (DPIE) for Gateway Determination.

(1) Quantification of the externalities/consequences of the proposed new planning standards compared to the current standards.

A review of the Planning Proposal documentation indicates that the Planning Proposal would be strengthened by further justification and quantification of the externalities (e.g., overshadowing, acoustics, infrastructure, servicing, change to streetscape and views to the site) likely to be created by a proposal which exceeds the existing floor space and height standards that might otherwise be accommodated within the existing planning controls.

Attachment 1 provides the range of issues that should be considered.

Importantly your attention is drawn to **Local Planning Direction 6.3 – Site Specific Provisions** which applies to the Planning Proposal. Local Planning Direction 6.3(5) states that a Planning Proposal must not contain or refer to drawings that show details of the development proposal. This Direction will influence how you can present the

Reference: JB:JM:20.00360
Enquiries: Mr N Southorn 02 6333 6213
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Planning Proposal and in particular the explanation of consequence between the current and future planning standards.

(2) Draft LEP clause

The Planning Proposal correctly seeks to relate the change in height and floor space to the erection of the buildings for the specific land uses proposed and that no change to the height of building and floor space ratio maps are otherwise proposed.

The Planning Proposal also identifies that a number of matters resulting from the height and density increase will be dealt with at the DA stage (e.g. urban design). It is Council's opinion that these matters should be referenced in a draft LEP clause as heads of consideration. The inclusion of heads of consideration in the LEP clause will provide certainty that, at the DA assessment stage, height and density gains will still secure buildings of urban design excellence. This will provide greater certainty to the matters to be considered in the DA as foreshadowed in the DPIE SEAR's.

The Planning Proposal should be updated to highlight that the proposed LEP clause will include relevant heads of consideration. These need not be determined now but the Planning Proposal needs to commit to their inclusion.

Further comments are offered in **attachment 1**.

(3) Strategic Discussion

Attachment 2 provides a number of areas where the strategic discussion in the Planning Proposal documentation could be strengthened.

(4) Errors and Omissions

Council has identified a range of errors/omissions (not necessarily an exhaustive list) summarised in **attachment 3**.

(5) Comments of Supporting Documents

Council has also provided a range of broader comments (not necessarily an exhaustive list) in **attachment 4** to this letter in relation to the supporting documentation provided from you. These comments should be considered as the Development Application is being further developed. Whilst not all these additional comments need to be addressed immediately it is important that the supporting documents to the Development Application are consistent with the Planning Proposal document particularly in relation to:

- Economic Assessment (justification of floor space and leasable area provision and its vertical configuration against horizontal configuration under the current planning standards, the latter being capable of achieving a similar floor space at a lesser overall height).
- Heritage Impact Statement (justification for building height changes against the current planning standard and impact on streetscapes).

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- Environmental Assessment (justification for building height changes against other potential impacts as compared to current building heights).

It is the view of both Council and the Department of Planning, Industry and Environment, that Council be satisfied of the adequacy of the Planning Proposal prior to exhibition. Council therefore seeks your consideration of these matters before it accepts the Planning Proposal and proceeds to Gateway Determination by the Department of Planning, Industry and Environment (DPIE).

Council suggests a meeting to discuss the matters raised in this letter so that the Planning Proposal documentation can be finalised. My assistant, Mrs Kylie Denyer, will be in touch, or Mrs Denyer can be contacted on 02 6333 6213 to make arrangements for the meeting.

Yours faithfully



Neil Southorn
DIRECTOR
ENVIRONMENTAL, PLANNING & BUILDING SERVICES

ATTACHMENT 1 - QUANTIFICATION OF THE EXTERNALITIES/CONSEQUENCES

The key areas that should be addressed in an updated Planning Proposal are outlined below.

(1) The floor space configuration

The ground floor footprint of the BIMC building could be increased based on the current site area, potentially removing the requirement for up to 2 additional floors. The proposed design of the building set back from the Howick Street property boundary is not necessarily considered appropriate for this site given the location of most commercial buildings within the CBD being at the street front with a verandah and awning over the footpath. Buildings set back from the street front in the Bathurst CBD are typically those used for Civic uses and overwhelmingly are located within or around the Town Square/Machattie Park area. More site area becomes available if, for example, the building is built to the Howick Street property boundary with verandah/awning over the footpath.

Insufficient justification is provided for why the smaller footprint is required. Why is vertical integration the only solution for the building given the total available site area and the multiple of complementary but independent uses proposed?

An optimal floorplate of 1500-1800sqm is referenced but no analysis is provided as to why this is optimal and appears to differ from the Albury and Orange examples used in the economic analysis.

The Economic Assessment should include discussion on the required floor space and leasable area, and how this cannot be provided under the current planning controls, that is within the current 12m height restriction and a FSR of 2:1. If the required floor space cannot be achieved within the current standards then this should be clearly articulated.

(2) Clarification of new Building Height standards.

The proposal is unclear and inconsistent in relation to the height (as defined in the LEP which includes the lift overrun) of the two proposed buildings. AHD on the architectural drawings appear to result in a different height requirement than requested in the Planning Proposal. Diagrammatic building envelopes relating to each site and their existing ground level would strengthen the Planning Proposal.

(3) Building height and views to and from new buildings – comparison between existing planning standard and new planning standards.

- a. The Planning Proposal should extrapolate figure 63 from the draft Bathurst Town Centre Master Plan (TCMP) to show the correct angle of impact on the visibility of the new building scale over and above the existing 3 storey (12m) height limit at the street frontage from the pedestrian view across the street in all directions: Howick, George, Russell and Rankin Streets. A comparison between the current 12m building envelope standard and the proposed new building height to each streetscape should be shown. The draft TCMP methodology seeks to minimise the potential impact of new building height on the CBD streetscapes, nonetheless the draft TCMP does offer the following caveat - Where additional height is proposed to the street front (in this case to Howick Street), the draft TCMP suggests that: *"Increases to building scale along streetfronts may also be appropriate, provided they respond to the predominant scale of Bathurst streets through significant upper level setbacks"*. Better justification of the impact of the

building envelope (as compared to the existing planning standard) to all four streetscapes against this methodology will strengthen the Planning Proposal.

- b. Views to the site – The Planning Proposal would be strengthened through the inclusion of clear illustrations which show the:
 - i. current views to the site,
 - ii. views with the insertion of building envelopes at the current 12m standard, and
 - iii. views to the site with the insertion of the proposed new building envelope at the new height standards, noting that the proposed new height standards will apply across the whole of each site not just that shown in the proposed building as currently designed.
- c. Views from all directions, inclusive of those directions where there may not in fact be an impact, should be included in the Planning Proposal. Only some of those views are presented in the current Planning Proposal.

Council is concerned that some of the imagery used in the Planning Proposal may misrepresent the scale of the development as inserted into the streetscape. Council strongly recommends a three-dimensional model be produced to provide 360° views to the site using both a building envelope based on the current LEP height standards and the proposed new standards. The implications of **Local Planning Direction 6.3** need to be considered in how this imagery is presented in the Planning Proposal.

- (4) Overshadowing Diagrams – comparison between existing planning standard and new planning standards.

D4 from the Environmental Assessment Report indicates that overshadowing impact will be minor but no comparison is made between the current planning standard of 12m and the new planning standards. Similarly only the proposed building is modelled as opposed to a building that occupies other parts of the site or indeed the whole site, for which the new height standards will apply.

The Planning Proposal needs to compare:

- a. Overshadowing that would be created by insertion of 12m high buildings across the sites (current LEP standard).
- b. Overshadowing that could be created by insertion of new buildings across the sites at the new building heights (new building envelopes at new heights entirely across each site).
- c. Overshadowing that is created by the building envelope of the proposed development at the new building height standard and with proposed setbacks etc. (that is to show how overshadowing is minimised and mitigated).

All shadow diagrams need to be checked to ensure they have been produced accurately (e.g. to true north, rather than site north inclusive of consideration of existing and finished ground levels). Information on the methodology used needs to be included in the Environmental Assessment Report.

The proposal does not identify existing nearby residential land uses (several properties on George and Russell have residential on the second floor). Overshadowing of properties on George and Russell may sterilise the rear of these properties for future residential development if they cannot achieve relevant light requirements for the apartment design code and planning controls and BCA requirements. The Planning Proposal does not address

the longer-term trend, generated from a downward trend in per capita rates of floor space for retail, services and commercial, smaller household formations, affordability and our aging population, towards demand for residential development in CBD's and whether overshadowing from the development may adversely impact on that trend.

(5) George Street Car Park site

The documentation is unclear and in some areas contradictory as to exactly how many levels of car parking will be achieved (whether or not all of that is constructed as part of the first stage of the development) against the new building height sought. All imagery needs to include the total building height achievable for the car park (not just that being constructed in the first stage). Consistency of wording to describe the car parking levels to be achieved needs to be inserted across all the documentation. Clarification is sought that the Traffic Assessment is undertaken on the total car parking that will be available on site upon full development, not just that which will be constructed in the first stage with the BIMC.

(6) Heritage Impact Statement

The Planning Proposal highlights that heritage impact was a concern raised during the pre-development consultation. The Heritage Impact Statement will be a key document of interest to the community in the Planning Proposal process. It is therefore critical that the Heritage Impact Statement clearly addresses the impact of new height on all of the CBD streetscapes surrounding the development and how that impact is proposed to be mitigated.

Key areas that need additional consideration in the Heritage Impact Statement include:

- a. A site history (across both the BIMC and GSC sites)
- b. Implications from the site history in relation to archaeology.
- c. Opportunities from the site history in relation to interpretation that might be incorporated into the development.
- d. An assessment of the impact of the new height against the current standard.
- e. An assessment of the impact of the new height against the requirements of chapter 10 of the Bathurst Regional Development Control Plan (BRDCP) 2014 and sections 10.4 and 10.5 that deal with proposed new infill development and matters of height, bulk, scale, materials and colour palette.
- f. Options to mitigate height – e.g. colouring and materials particularly up to the 12m height, options to pedestrianise the Howick Street carriageway and footpath (e.g. extension of replica lampstands into this block, new landscaping, public art, awnings and verandahs over the footpath, extension of footpaths in Howick Street coupled with conversion of on-street parking to parallel parking and so on).

It is noted that the BRDCP and the draft TCMP are mentioned in the conclusion of the HIS but that neither are otherwise addressed in the HIS.

It is recommended that site history information be obtained from the Bathurst District Historical Society in relation to the land as the Historical Society hold key collections such as the historic Council rate books.

(7) Urban Design

Council notes that the Environmental Assessment report does not yet encompass all matters that might be incorporated into an Urban Design assessment of the proposal. It is acknowledged that this report is required by the SEARS (point 4 of SEARS) and will be critical at the DA stage.

The inclusion of an Urban Design Assessment at this time would strengthen the case for change sought by the Planning Proposal. At the very least the Planning Proposal should acknowledge that the LEP clause to be inserted will include urban design heads of consideration. These do not need to be settled before Gateway Determination but will need to be settled before finalisation of the Planning Proposal.

The NSW Government's Better Places framework would suggest that the urban design assessment and LEP clause framework would need to incorporate (at a minimum):

- How the development engages with the history and culture of the Bathurst Town Centre.
- How the development integrates with the Bathurst Town Centre and its streetscapes.
- How the development integrates with the environment and landscape of the Bathurst Town Centre.
- How the development revitalises the streets and the Bathurst Town Centre.
- How the development prioritises connectivity, walkability and cycling opportunities.
- How the development responds to climate conditions and their impacts on the Bathurst Town Centre.

The Planning Proposal would benefit from more building envelope drawings including street elevations for all streets surrounding the site and section drawings for all access laneways into the site.

(8) Traffic

The Planning Proposal highlights that traffic generation was a concern raised during the pre-development consultation.

Whilst the traffic assessment report suggests that the additional floor area and car parking spaces generated by the new building height can be supported in the surrounding street network it would strengthen the Planning Proposal to provide visual diagrams (and section drawings) of:

- a. The existing traffic arrangements and proposed traffic arrangements around the site, particularly Howick St (between George and Rankin Streets) and Rankin St (between Howick and Russell Streets) so that improvements and changes to each street block (e.g. new landscaping, traffic islands, linemarking etc and any changes in on-street parking arrangements and provisions for public and community transport) can be visualised.
- b. The existing and proposed traffic and pedestrian arrangements into, through and out of the site from Milne Lane, Gallipoli Road, Rigby Lane and Machattie Lane and the new lane off Howick St (on the immediate western side of the BMIC building). Council remains concerned about the lack of safe and efficient pedestrian access through the GSC site from Machattie Lane to the RSL Club. This is a particularly important pedestrian link between the War Memorial Carillon in King's Parade and the RSL Club.

ATTACHMENT 2 - STRATEGIC DISCUSSION

- (1) Local Strategic Planning Statement: The Planning Proposal does not discuss how the proposal sits in relation to the LSPS Structure Plan map that identifies a hospital/medical precinct in and around the Bathurst Base Hospital and justification of the siting of BIMC in the CBD taking into consideration the Bathurst Health and Knowledge Precinct Discussion Paper 2020.
- (2) Central West and Orana Regional Plan: The Planning Proposal needs to address action 5.1 “Establish health precincts around hospitals in regional cities and strategic centres”. Again, a CBD location away from the Bathurst Base Hospital precinct needs to be discussed and justified in the Planning Proposal documentation.
- (3) Bathurst Bulky Goods and Business Development Strategy 2011 – identifies the GSC site as the next regional level shopping centre. The Planning Proposal documentation (including through the Economic Impact Assessment) should justify the development against the recommendations of this Strategy and the longer-term impacts of the development (negative and positive) on the CBD.
- (4) **Local Planning Direction 6.3** needs to be addressed in the Planning Proposal and the implications of subclause (5) on how the material is able to be presented.

ATTACHMENT 3: ERROR CORRECTIONS TO CURRENT PLANNING PROPOSAL DOCUMENTATION

This list should not be viewed as an exhaustive list of errors or omissions within the documentation submitted with the Planning Proposal.

Planning Proposal Document

- Page 8 - The PP identifies public domain embellishments as part of the future construction of the medical centre. These benefits, it is presumed would be inclusive of improvements to, for example the Howick and Rankin Street blocks (beautification and landscaping and reconfiguration of parking), Machattie Lane upgrades, improvements to other laneways including pedestrian access, and replacement amenities. The Planning Proposal is then silent on these benefits and drawings included in the PP and supporting documentation do not highlight what these benefits (many of which are essential to the development) might look like.
- Page 11 – indicates CBD covers two city blocks – this is incorrect.
- Page 13 – GSC site also currently includes an amenities block.
- Section 2.2.3 – site is not flat – specify fall across the site. This is important in relation to later discussions on height of buildings against the height of the Carillon.
- Section 2.2.6 – references a heritage significant overlay – HIS refers to Council’s BCAMS mapping – inconsistency of terminology between the two documents. BCAMS mapping is correct (see BRDCP chapter 10).
- Section 2.4 – states that the proposal responds to principles set out in the draft TCMP. The PP and supporting documents have misinterpreted the methodology outlined in the draft TCMP and outlined in figure 63 of the Master Plan.
- Page 16 – does not identify current streetscape bulk and scale, and the current height and FSR standards as constraints to the site – these must be addressed by the PP. This is a significant omission.
- Page 25 – first dot point – exclude that the site is to be developed “in partnership with Council” as only part of the site is Council owned.
- Section 3.4 and section 7.2.1 – Heritage Impact is summarised poorly and the built form as anticipated by the draft TCMP is incorrectly interpreted.
- Section 7.3.1 indicates that current planning controls sterilise the site – this is incorrect- the current height and FSR standards permit development to a height of 12m with a FSR of 2:1- this is not a sterilisation of the site. The PP needs to explain why vertical integration is the only development option for the medical centre on this site, that is, the need for greater height versus other development options under the current planning standards needs better discussion.
- Page 35 – Does not address Ministerial Directions 2.6 (remediation of contaminated land) and 3.4 (integrating landuse).
- Ministerial Direction 6.3 (site specific provisions) this discussion should include the need for urban design heads of consideration to be inserted into the clause – whilst the PP may be inconsistent with Direction 6.3, it might be justified through appropriate urban design criteria being included in the LEP clause.
- Figure on page 38 is incorrect in relation to any reference to the draft TCMP. Site line of 33° and 45° needs to be discussed against the actual site lines used in figure 63 of the draft TCMP.
- Page 40 – Definition of “reasonable outcome”. What is the reasonable outcome compared to existing standards?
- Section 7.6 – Council will not accept delegations with respect to the PP.

Environmental Assessment

- Page A1 overview: wording of statement is incorrect - local businesses do not get to use the carparking for free – the car parking is public car parking whether or not it is used by businesses or visitors to the business/CBD. Statement should be removed.
- Page C1 and C2: references to the draft TCMP are incorrect. The intent of the draft TCMP methodology is to minimise new building height above 12m to the pedestrian view from across the road - the angle is the angle of a person on the other side of the road with their line of site to 12m on the building site across the road. See figure 63 (page 179) of draft TCMP. Where the new building height is proposed to the street frontage the draft TCMP recommends: *Increases to building scale along streetfronts may also be appropriate, provided they respond to the predominant scale of Bathurst streets through significant upper level setbacks.*
- C3: a statement is made in relation to the terracotta tiling – “that this is representative of Bathurst’s health infrastructure, being used at the Bathurst Health Services adjacent to the significant heritage buildings”. Clarification is sought as to exactly what the terracotta tiling is, as the material used at the Base Hospital would not be considered appropriate. Clarification required, preferably a sample to be provided to Council so that it would also be available during public exhibition. Provision of a materials palette would strengthen the Planning Proposal.
- C4: must (not “can”) include CCTV.
- C4: Pedestrian access into and through the site is very poorly illustrated, from all laneways and from Machattie Lane through to the RSL Club. Imagery throughout the documentation is not clear. Better visual imagery and section drawings and landscape plans required.
- D6: reference park as King’s Parade not Carillon Park (mislabelling/naming may get some members of the community offside). Check spelling throughout all documents for errors in park and street names.
- D7: the most impactful view is view 3 from the Rankin St roundabout. Further consideration and expert advice needed – e.g. would more street trees along Howick St and around the corner into Rankin St reduce impact on the streetscape and the impact on this view. Plans need to be included to show all improvements within the Howick and Rankin Street blocks, inclusive of treatments that might mitigate view impacts such as landscaping.

Economic Impact Assessment

- Unclear on the relevance of the rationale on page 16 in the discussion about workers coming in and out of the CBD to service the BIMC.
- Page 22: most visitors to the BIMC will come in via car-based trips regardless of location in or out of CBD. Think it is incorrect to assume that a CBD location will limit car-based trips.
- Potential demand (or in this case lack of demand) for activating ground floor uses is not considered.

Traffic Impact Assessment

- 2.4.3 – Russell/George has 3 pedestrian crossings not 2.
- 2.5.1 – states that this a fringe CBD site – the site is however an integral site within the CBD with development potential adjacent to two key CBD high streets, being George and Howick Streets.

ATTACHMENT 4 - OTHER COMMENTS FOR DA DOCUMENTATION

This list should not be viewed as an exhaustive list and it is assumed that all supporting documentation will be provided/updated with the development application in accordance with the SEARs issued by DPIE.

Heritage Impact Statement

As outlined in the letter Council remains concerned that the Heritage Impact Statement, as drafted, does not adequately support and strengthen the planning proposal. Some additional comments to those provided in the letter are offered.

- AHIMS did not identify any Aboriginal sites. Council's Aboriginal Sensitivity model identifies the site as being of moderate sensitivity. Council notes this is not included in the HIS and that the SEARs requires the preparation of an Aboriginal Cultural Heritage Assessment.
- Limited consideration of character analysis beyond immediate area – other areas of relevance would be Howick between Rankin and Stewart and Rankin between Russell and Durham
- Location G – fake heritage in George Street
- No streetscape comparison between 12m building and 29m building
- No discussion on transition between various heights in streetscape or when viewed from adjoining properties
- HIS concludes that there will be "Limited impact" but this is not well quantified and justified.

Environmental Assessment

- Services and infrastructure - No analysis is provided in relation to current infrastructure capacities, and the ability to accommodate the additional floor space. No initiatives are proposed in relation to green infrastructure that could be used to minimise or negate the demand on these proposed by the additional floor space. For example, there is no assessment of Jordan creek – the development might have positive impact if retaining stormwater for onsite reuse?
- Image on front cover:
 - Does not show treatment around new public space off Gallipoli Road.
 - Open space to west of entrance requires further consideration as to landscape treatment.
 - Suggest parallel parking along Howick Street frontage to increase available forecourt for landscaping and pedestrianisation. Revert on street parking to parallel parking from Milne lane to Rankin Street to cater for buses, taxis and community transport.
- C1: note reference to Government Department offices being part of the development, presumably as part of allied health or teaching space. Leaseable area needs to be quantified to ensure there is adequate demand for health related services to fill space.
- C3: seek further consideration and expert advice on the colouring of elements R, S, Q and P on car park – should these be warmer autumn tones? Opportunity for public art to be used in the screening of car park ramps and/or on other building locations. Car park design is critically important to future opportunities for surrounding premises to activate their rear spaces.
- C3: seek further consideration and expert advice on colouring of upper floors and louvres of BIMC. Is more "Bathurst red" needed on the ground floor?

- Lighting and CCTV plan need to be included for the DA.
- E1: landscape plan needs additional expert advice and opinion. BIMC entry will be extremely exposed to sun and winds. Opportunities to improve the forecourt include changing on-street parking to parallel and widening the Howick St footpath, additional landscaping, public art and heritage interpretation. Ability to walk from Machattie Lane directly to RSL Club? Treatments of Gallipoli Road and Milne Lane, particularly for pedestrians? Treatment of Machattie Lane for pedestrians? Really not clear what the benefits are to the existing and new public spaces and how pedestrians will navigate into and through the sites, particularly given the narrow width of the existing laneways. It would be beneficial to have better details at PP stage.
- Suggest parallel parking for Howick St frontage to increase the building forecourt area to Howick St and therefore the size of landscaping that can be inserted in front of the building. Suggest extension of lamp standards down this block of Howick St (dependent upon traffic changes required) to bring the street down to a more pedestrian level street block.

Traffic Impact Assessment

(1) Comments from Council's Engineering Staff:

- The Traffic Impact Assessment is undertaken appropriately and uses correct methodology. However, as average delays are given per intersection, there is no data on delay per leg. Normally this would not be a significant issue, but in this case it means critical legs such as the north of George St in AM and south of George St in PM are not being assessed on their own, but instead averaged with all other legs. Given the average delay per vehicle for the other intersections is slightly higher than for other (~1.3 sec), when factored into the specific leg this applies to, the delay is possibly more like 8-10 seconds by a very rough review. This puts it on the verge of LOS A → LOS B. With the growth factors contributing an additional ~1.2 sec delay, this may possibly push it between the two to around 10-15 second delay for the heavy legs. The consultant may need to review this to confirm. Provision of results from Sidra analysis may assist in assessing this issue.
- Mid-block is assessed based on capacities for two-lane, two-way roads, but does not appear to factor in the impact of adjacent delays at the Howick / George intersection. This intersection has historically caused traffic to bank up along George Street to Russell Street, and a slow-moving queue would not be meeting capacity while experiencing poor level of service. It is assumed this has been assessed using the % below designated speed method for interrupted flow, as defined in Austroads Guide to Traffic Management Part 3, Section 5.2. To further confirm these conclusions, average midblock vehicle speeds should be provided to enable the resultant LOS to be assessed.
- There is no indicated increase in volume under growth scenario for George Street between Howick and Russell. Why this is the case is not advised. Furthermore, any increase not included may impact LOS, given this is the known route of congestion currently. Refer comparison snip below.
- Regardless of this, the determined overall impact of the development on the network is minimal, which appears a reasonable conclusion, but cannot be confirmed without the points above being addressed.
- The sensitivity analysis highlights the issues with the George / Howick intersection that are not evident from the results, including queuing in the adjacent block of Howick. Queuing is significant (85m). This is likely due to the operating mechanism for

roundabouts where in practice drivers give way to right, and the right leg is the heavy George St leg. As queue length in Howick is able to be provided, queue lengths in the George leg should also be able to be identified. As noted, issues appear due to the existing situation, not the result of the development. However, without the correct background increase on George St identified above, and provision of queue length calculated on George, this is hard to confirm.

Location	Weekday*	Weekday AM Peak		Weekday PM Peak		Weekday	Weekday AM Peak		Weekday PM Peak	
	Veh/d	Veh/h	LOS ²	Veh/h	LOS ²		Veh/h	LOS	Veh/h	LOS
Howick Street (West of George) Eastbound Westbound	6,440	464		566		8,810	636		773	
		245	B	339	B		284	B	479	C
		219	B	227	B		352	B	294	B
Rankin Street (South of Howick) Southbound Northbound	7,810	624		625		10,180	795		833	
		403	C	291	B		535	C	358	B
		221	B	334	B		260	B	475	C
Russell Street (West of George) Eastbound Westbound	6,500	552		488		7,290	609		557	
		323	B	223	B		336	B	270	B
		229	B	265	B		273	B	287	B
George Street (South of Howick) Southbound Northbound	10,270	803		840		10,270	803		840	
		520	C	387	C		520	C	387	C
		283	B	453	C		283	B	453	C

Left hand side is pre-development, right hand is post-development. No change bottom row.

- Gallipoli Road proposed right turn treatment:
 - No detail is provided for this proposal, the consultant should provide a concept design to demonstrate compliance and impact.
 - A review of the proposed right-turn slip lane shows that it would be difficult to accommodate this without significant impact on parking. The majority of parking out the front of the Police Station would need to be converted to parallel parking, which would result in a loss of roughly 10 parking spaces currently used by police vehicles. Further to this, parallel parking is likely to be less feasible for police vehicles exiting spaces under emergency response. Police consultation would need to be undertaken, and unlikely to be supportive of the proposal.
 - The alternative of removing parking out the front of the RSL Club is likely to be preferable, but less feasible from a design functionality perspective.
 - No detail has been provided as to proposed length of slip lane. Greater storage may require further removal of parking.
 - The proposal does not indicate why the right turn slip lane is proposed. No justification is given in terms of comparative modelling.
 - Heavy vehicle access in terms of deliveries may warrant some consideration in terms of time-restrictions to improve access and reduce delays.
- Rigby's Lane – Should this be a pedestrian access only? – No assessment made of this laneway.
 - Rigby's Lane is currently low volume – no assessment included.
 - The Lane does not really provide much in the way of vehicular access to the carpark as vehicles will need to circulate right around the site to access the carpark.
 - Might have value as an exit only due to the direction of traffic coming out of carpark, if so, how would a right turn out into Russell St be managed?

(2) Comments from Council's Planning Staff:

- Need to consider all turning movements into and out of each access laneway and illustrate how these will be managed.

- Need to separate out the parking required for BIMC versus supply that will otherwise be provided as public parking.
- Concerned about reason/need for boom gates, why is this parking to the immediate west of BIMC not dedicated as a drop off pick up area.
- 2.5.1 - states that high traffic movement occurs throughout the day, but there is no assessment of this as part of the BIMC – only the AM & PM peak is assessed. Given medical clinics etc, impacts throughout the whole day should also be assessed.
- Table 2-2 – uses a 1.5% growth in traffic, Council notes that the RMS uses 2% - concerned that future growth is not adequately factored into the assessment.
- 4.2 – Calculation of the required car parking spaces may not be reflective of actual floor space allocations to different uses.
- 4.2 – Boom gates to forecourt carpark – why are these required and how would that impact access into the development and into the GSC. Why isn't the carparking immediately west of the BIMC entrance for drop off/pick up only – very short-term parking which would be hindered by boom gates?
- Why is the RSL loading area shown on Council land – all loading for the RSL Club must be on their own land.
- No capacity to turn into the area shown near the RSL loading dock – need small scale roundabout – what about delivery vehicles in this area (size?).
- Clarification is required on the need for right hand turns out of Milne Lane into Howick St – what improvements are needed in this street block of Howick St to manage both traffic and pedestrian movements.
- "Drop off" and "Ambulance" areas are located on GSC but should be located wholly within the boundary of the BIMC site.
- Truck loading area – significant conflict with pedestrian movements – would require reversing movements either into or out of this area – would cause high risk movements in terms of pedestrians.
- No internal connections between ground level and level one of the carpark.
- Heavy vehicle movements are inconsistent with general traffic flows eg one way Heavy Vehicle vs 2 way cars in front of the RSL Club.
- Slight difference between GFAS (10271 vs 9634).
- Site plan includes 25 on-site spaces so total number of car parking spaces is slightly more than assessed (915).
- Analysis does not identify public buses routes (all of which pass the site) or the location of bus stops and resultant pedestrian movements in the CBD.
- No analysis is provided of Cycling routes or Council's Access and Cycling plan. No quantification of Cycling demand as the result of development is proposed.
- Pedestrian analysis is not accurate. Existing identification misses the important link from Machattie Lane to the entrance of the RSL Club.
- The traffic report should address private vehicles, community transport vehicles (small buses and the like), rates of taxi and private transport services use, patient transfer vehicles.
- Pedestrian and Cycling routes illustrated in the development are not ideal in several locations, the design simply 'pushes' pedestrian and cycles around the buildings.
- Unclear from the proposal what areas are considered 'public roads' and which are private areas.

Economic Impact Assessment

- Conservative population and population projections have been used, as acknowledged by the consultant. This will lead to the current and future undersupply of medical services in Bathurst being understated. Therefore, these projections (Page 17 & 18) should be considered conservative. Projections are under stated based on the following:
 - Page 11 - Catchment area will likely include Lithgow and Blayney as secondary catchments.
 - Page 12- Report complete prior to the new .id forecasts being released. Population forecasts in LIQ report based on a mid-point between former .id and the latest NSW Government forecasts.
- Page 23 – 10% discount to net (new) employment is low given the private hospital will be a relocation and the medical practices are also planned to be relocated from existing CBD businesses. Several allied health uses are also likely to be relocated. However, LIQ are likely assuming the backfill of existing facilities planned to be relocated to the new medical centre with uses that generate a similar employment per square metre ratio. If this occurs, the 10% is reasonable.
- The potential location effects of a CBD private hospital to generate more allied health and more specialities services are significant in the justification for the proposal.
 - Analysis does not identify how locating the existing private hospital into the CBD will significantly enhance co-location opportunities for additional health specialities and allied health services.
 - Analysis of per capita rates of allied health and health specialities is not provided.
 - Analysis of recently constructed and significantly under-leased allied health facility on CSU campus is not provided.
- Assume BIMC will attract up to 14,000 persons per week similar to Bathurst. How does this compare with vehicle trip estimates in the traffic assessment?

Contamination Assessment

- The provided report does not comply with the requirements for the Preliminary Contamination Report in the Guidelines for Consultants Reporting on Contaminated Sites (2020). The report would be considered a literature review. The report does, however, provide sufficient information to direct future activities.
- Likelihood of contamination is higher adjacent to the Clancy site and for contamination that may have migrated off site?