

11 May 2023

Kate McKinnon
Senior Case Manager
Department of Planning and Environment
84 Crown Street
Wollongong NSW 2500

Re: Peer review - Proposed development at 28-32 Somerset Street, Kingswood (DA22/0326)

Dear Kate,

EMM has been engaged by Department of Planning and Environment (DPE) to undertake a peer review of the proposed Medi-hotel development located at 28-32 Somerset Street, Kingswood (PPSSWC-244). The subject site comprises three lots known as 28, 30 and 32 Somerset Street which are located at the north-east corner of the intersection of Somerset Street and Hargrave Street. The site frontages are 55.5 m to Somerset Street and 19.8 m to Hargrave Street.

1 The proposed development

A mixed residential and commercial development has previously been approved for this site, including a combined entry/exit driveway on Hargrave Street. That development comprised of 54 residential apartments and 184 m² of commercial floorspace, with basement car parking for 74 cars, 15 bicycles and a loading area. This development was approved but was not commenced.

The current proposal includes a development which will comprise three basement levels for car parking (63 spaces) and utilities; ground floor with guest rooms, wellness centre and services; five levels of guest rooms and a rooftop area providing food and beverage services, terrace and administrative rooms.

There will be a total of 140 hotel rooms primarily servicing the accommodation needs of pre and post operative patients and their families associated with Nepean public and private hospitals. The hotel will be operated by maximum 30 staff at any given time.

Access to the site, including service vehicles and guest vehicles will be via a combined entry/exit driveway in Hargrave Street.

The Development Application (DA) was submitted Sydney Western City Planning Panel 12 April 2022. As part of the approval process, EMM has been engaged by DPE to undertake a peer review of this development application in relation to parking. As such, this peer review specifically addresses the parking related matters, no traffic related analysis is undertaken as part of this peer review.

2 Documents reviewed

The following documents have been reviewed as part of this peer review:

- Penrith City Council’s DA assessment report
- Traffic Impact Assessment report prepared by ttp, dated 22 July 2021 (ttp reference 20227)
- A letter prepared by ttp in response to Penrith City Council’s traffic and parking related issues, dated 27 September 2022 (ttp reference: 20227)
- Statement of Environmental Effects prepared by ppd Planning Consultants dated 12 April 2022
- Penrith City Council’s Transport, Access and Parking C10 (2014); and
- Relevant architectural plans prepared by rothelowman, revision B, dated 6 October 2022.

3 Outcome of the peer review and recommendations

3.1 Car parking provision and EMM assessments

3.1.1 Hotel

Based on the council’s DCP car parking (C10, 2014) rate, the hotel would require total 146 spaces {(1 space per unit)+1 (1 space per manager) + 5 (space per 6 employees)}. The development, as currently proposed, provides 63 car parking spaces.

The Traffic Impact Assessment (TIA) has provided analysis and argument in favour of the proposed lower number of on-site parking spaces for the hotel. Section 4.1.1 of the TIA presented the following arguments in support of the lower car parking provision:

- DCP does not distinguish the parking requirements between hotel and motel. Motels (derived from ‘motor hotels’) generally cater for people travelling by car who requires overnight stay before continuing their car base journey.
- Penrith City Council has previously accepted lower car parking provision for other casual accommodation developments (DA/0490 and DA16/0357).
- The RTA *Guide to Traffic Generating Developments*, October 2002, stipulates a lower parking requirement for the hotel component of the development.

Further to above, Section 4.1.4 of the TIA also has also made reference to the approved parking provisions associated with a number of comparable hotels located in close proximity to hospital precincts and which primarily serve hospital patients and their relatives, rather than general public and tourists. Examples include similar medi-hotels at St Leonards in NSW; and Murdoch Health and Knowledge Precinct, Fiona Stanley Hospital, and St John of God Murdoch, in Western Australia.

The report notes that a medi-hotel development on Hogben Street at Kogarah is adjacent to St George Private Hospital and close to St George Public Hospital, provides no on-site car parking for the visitors or employees of its apartments.

The TIA concluded that the anticipated parking demand for the subject medi-hotel would be met by the provision of one space for every four accommodation rooms, plus three spaces for the use of executive staff,

equating totalling 38 on-site car parking spaces. This is comparable to the car parking recommended in the RTA guide for a 3-star or 4-star tourist hotel.

[EMM assessment:](#)

I agree with ttp's justification given that most of the hotel occupants are either outpatients of the adjoining hospitals or their visitors/relatives accompanying them. Whilst I do not agree with the car parking comparison with medi-hotel at St Leonards which has higher level of public transport accessibility, the likely car parking demand for the subject hotel is unlikely to exceed the estimated 38 spaces for the hotel component of the facility. It seems reasonable to assume that pre-operative or post-operative patients would not rely on private car transport to move between the proposed medi-hotel and the hospital precinct.

The adjoining street car parking spaces are generally restricted to two to four hours. Should there be any additional car parking demand in exceptional circumstances, there are ample of off-street car parking spaces. For example, the adjoining Nepean Hospital has a [multistorey](#) car park accommodating over 600 spaces which includes 14 spaces for parking with disability. The car park operates 24 hours, 7 days per week with a daily maximum car parking rate is just over \$20 which is considered reasonable (Plate 3.1).

Furthermore, there is another Somerset private and specialist centre [car park](#) has 100 spaces which operates 6 am to 9 pm everyday (Plate 3.2). The maximum car parking rate is \$17 for 15 hours which is considered reasonable. During the site visit on Saturday, 29 April 2023, 88 car parking spaces were notes to be available for this car park.

Given there are ample other public car parking opportunities within close proximity to the site, I agree with ttp's justification of the lower car parking provision for the hotel component of the development. The net parking impact to the adjoining unrestricted street parking is considered to be minimal, however, council may consider installing car parking restriction to the currently unrestricted parking in close proximity to the hospital. The long term parking requirements of local residents can be addressed by introducing Resident Parking Schemes (RPS) in these streets as and when the need arises.

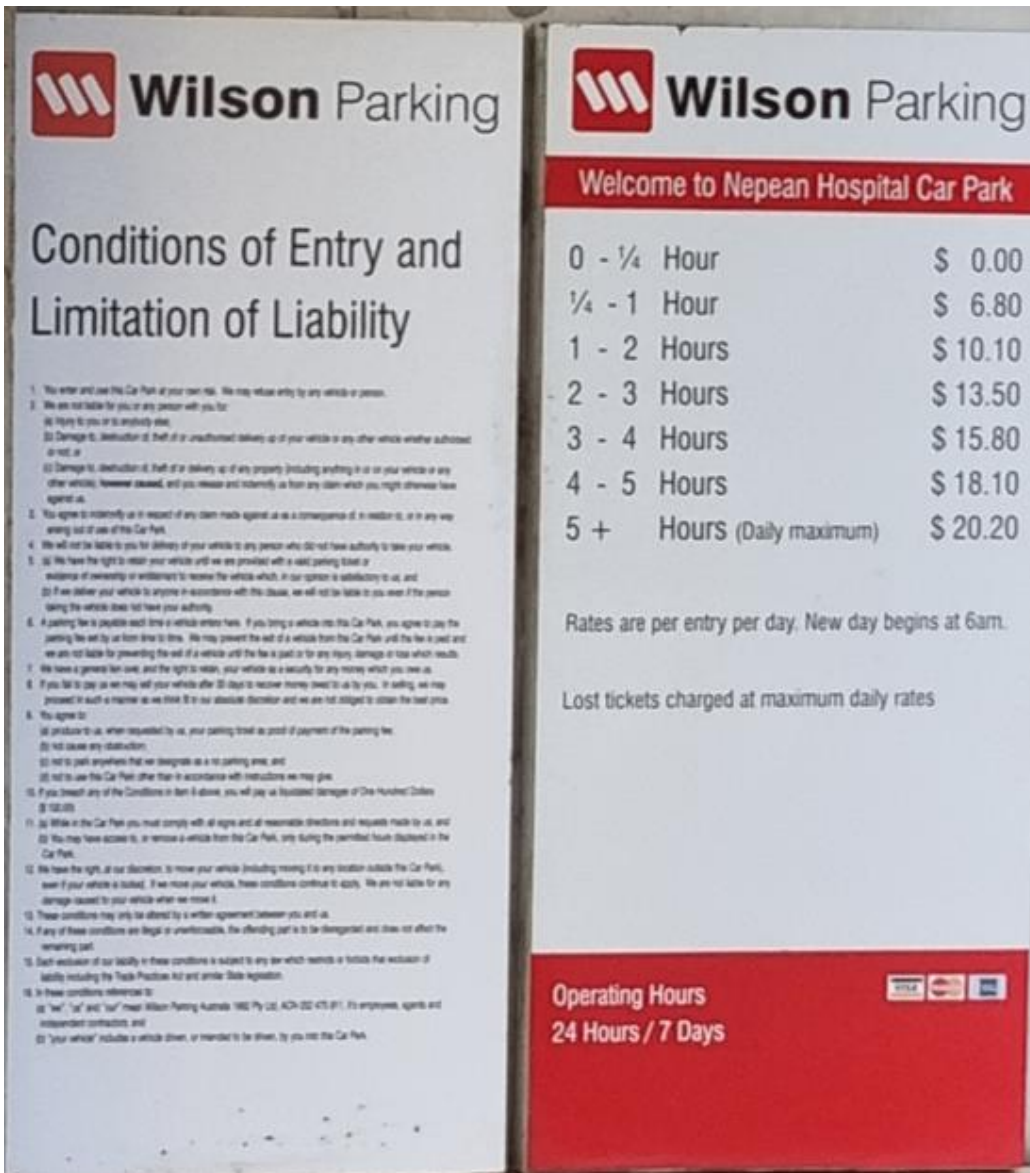


Plate 3.1 Nepean Hospital car parking rates



Plate 3.2 Access to public car park to Somerset Private Hospital

3.1.2 Ancillary facilities

There are a range of ancillary uses associated with the medi-hotel. The floor areas for each are summarised at Table 1 in the TIA. These are taken to be correct. We have not recalculated floor areas for the purpose of this report.

i Food and beverage

The proposed hotel includes a food and beverage area comprising 199.7 m² on the rooftop level.

The parking requirement based on Council's DCP is taken to be 'restaurants, reception and function rooms' and therefore requires 1 parking space per 6 m² of area. The rooftop area is not taken to be a 'pub' or 'bar'.

The DCP parking requirements will therefore be 33 spaces.

ii Outdoor terrace

The rooftop provides an open area of 171.5 m² identified as an outdoor terrace.

The terrace is assumed to be part of the food and beverage use for the building and therefore the parking requirement based on Council's DCP specifications for 'restaurants, reception and function rooms' is 1 space per 6 m² of area.

The DCP parking requirements will therefore be 28.5 spaces.

iii Meeting room

The rooftop floor includes a meeting room of 15.7 m² in area.

This is taken to be a normal ancillary use for any hotel or motel accommodation and is subsumed within the overall parking requirement for the facility. No additional parking is generated.

iv Wellness centre

The hotel also proposes a Wellness Centre (ground floor).

The parking requirement for these type of facilities as per Council's DCP, are taken to be:

- Fitness centre including gym: 7 spaces per 100 m² GFA,.

The Wellness Centre on ground floor comprises 67 m² meaning 4.4 spaces are required under the DCP.

v Wellness retail

The hotel includes a Wellness Retail area (ground floor).

The parking requirement for these type of facilities as per Council's DCP, are taken to be:

- Retail Premises Shop: 1 space per 30 m² GFA.

The Wellness Retail facility on ground floor is 159 m² meaning 5.3 spaces are required under the DCP.

vi Considerations

Although there is no car parking assessment specifically for the ancillary facilities that will be located in the rooftop area, the ttp letter dated 27 September 2022 advanced the view that these facilities are not expected

to be freely accessible to, or attract patronage from, the general public. The customers of the rooftop food and beverage area would principally be drawn from outside the occupants of the medi-hotel and visiting family or friends. The ttp letter states that the food and beverage areas would form an integral component of the medi-hotel operations, providing a dedicated dining area for hotel guests. The nature of the facilities is expected to reflect that, rather than being a destination restaurant serving the wider community. This is also suggested by its location on the upper floor of the development, where it is less likely to generate patrons from exposure to the street, as may be expected at a traditional standalone restaurant. Its proximity to the hospital precinct may attract some hospital staff and visitors, who would not typically drive a car to the site having already travelled to the hospital.

On a related basis, the ttp analysis suggests that the wellness centre and wellness retail would generate no additional demand for parking because the customers for these services would likely be patients staying in the facility.

EMM assessment:

I agree with ttp's parking assessment that the food and beverage areas will primarily serve the hotel patrons. There may be some external customers for these facilities but any non-resident visitation is unlikely to generate any significant parking demand for the facility. On that basis, provision of the proposed car parking spaces (11 spaces) is considered reasonable.

I agree with ttp's assumption that these Wellness Centre and Wellness Retail, will primarily serve the hotel patrons. The additional parking demand to be generated by any external visitor will be minor. Furthermore, I understand that the development will provide total 63 car parking spaces where parking allocation will be 38 spaces for the hotel guests and 11 for the food and beverage areas, totalling 49 spaces. As such, the remaining 14 spaces should cater the parking demand for the remainder of the ancillary facilities.

The locality is served by ample adjoining off-street car parking – for example, 600 spaces are available for the public and additional 100 spaces for the private hospital. The overnight parking fees are reasonable, therefore, the risks of adverse parking impacts to the adjoining residential streets are considered to be minimal.

Based on the above assessment, I agree with the justification provided in the ttp submissions and based on my professional view, 63 on-site car parking spaces should satisfactorily cater the parking demand for the proposed medi-hotel development.

As long as the on-site spaces are not sub-leased to other retail or commercial facilities and general public for the financial gain, the car parking provision of 63 spaces should cater the demand for the hotel. However, it is recommended that a visible sign at the driveway entrance indicating "Private Parking: Hotel Guests Only" (or similar) can be installed to curtail unauthorised public access to and use of the car park.

3.2 Disability parking provision

Section 4.5 of the TIA states that six disability car parking spaces will be provided in accordance with the requirements of Building Code of Australia.

EMM assessment:

In my view, the provision of six disability car parking spaces (9.5% of the total car parking provision) is considered to be acceptable to cater the parking demand for people with disability for this facility.

3.3 Loading facilities

The development will provide one loading facility accommodating a 6.4 m long Small Rigid Vehicle. The TIA states that the loading dock will be located on basement level 1, whereas subsequent ttp letter states that the loading dock will be located on the ground level, southern side of the vehicular path to the basements, north of the driveway. For this assessment, I consider the latest information, ttp letter, is updated.

The ttp letter states that the provision of a single loading bay suitable for a SRV is consistent with this approved development and another serviced apartment development located at 10-12 Hargrave Street. The medi-hotel and ancillary facilities would all be managed by the same operator. This would allow for management and scheduling of use of the loading dock for the development as a whole, thus maximising the efficiency of the space and removing the need to provide additional loading space to accommodate unexpected servicing requirements.

The letter concluded that the proposed provision of one loading space is expected to accommodate the anticipated heavy vehicle demands for the site, as required by Council's DCP.

EMM assessment:

I do not agree with the comparison of the loading demand between the proposed medi-hotel and the service apartment at 10-12 Hargrave Street as the loading demand for a service apartment and a commercially run hotel are different.

The ttp report and the letter has mentioned that the proposed the proposed medi-hotel and ancillary facilities would all be managed by the same operator, hence the loading delivering will be adequately managed. However, no supporting documentation has been attached with the submission.

It should be noted that only one loading dock will be shared by loading deliveries and waste collection. There is a potential that loading delivers and waste collection may coincide which may create traffic congestion or likelihood of on-street deliveries which is not a desirable outcome.

If the proponent has other similar scale medi-hotel at a comparable location/s, it is recommended that the proponent provides last three months data of the following to make a determination of the loading dock demand for the subject site. The following information is required for assessment:

- Loading delivery company and type of delivery eg food, beverages, equipment, medication etc
- Location of the hotel and number of rooms
- Presentence of room occupied
- Number of loading dock provided on site
- Information on loading dock is shared with waste collection vehicles
- Chart of daily loading deliveries for the last three months stating type and dimension of the vehicle, arrival and departure time and overall length of stay,

Should the above information adequately justify that the proposed development will be adequately served by a single SRV space, it should be accepted. Otherwise, additional loading dock should be provided based on the other comparable medi-hotel eg at Kogarah.

Subsequently a Loading Dock Management Plan (LDMP) could be conditioned as part of the approval. Any loading and unloading from the street can also be conditioned.

3.4 Waste collection

The ttp letter states that waste collection would take place using a contractor with *an appropriately sized vehicle*. There is no further information on what constitutes an appropriately sized vehicle. If the waste collection is to occur by a SRV, it should be clearly stated.

As the loading dock and waste collection are proposed to occur at a single SRV space, it would require adequate planning and coordination. Otherwise, there is potential conflicts of deliveries. It should be noted that if the waste collection occurs too early in the morning, it would create noise and other amenity issues. On the other hand, if the waste collection occurs during the day time, it may experience potential conflict with delivery vehicles.

To make a determination on the waste collection vehicles, further information is required for the last three months for a comparable medi-hotel, as follows:

- Duration and timing of the waste collection for each type of waste
- Average duration of stay; and
- Type of vehicle used and its dimension.

It is noted that the waste collection is proposed to occur by a private contractor. However, if the contract fails for any reason and council is required to collect waste, it is prudent to design the waste collection area for accommodating a standard council waste collection vehicle which is 10.5 m long.

EMM assessment:

Section 5 (t) of the DCP (design of Parking and Manoeuvring Areas), states that *All loading and unloading areas are to be separated from car parking and waste storage and collection areas and located away from the circulation path of other vehicles.*

The above DCP requirements have not been met. Further information is required on waste collection for a comparable medi-hotel.

3.5 Bicycle parking

Section 4.2 of the TIA proposes 16 bicycle racks, being eight visitor bicycle racks located on the ground level, and eight staff bicycle racks located in the basement car parking areas based on 3 to 5% for staff and 5 to 10% for customers/ visitors. The report recommends that the bike parking be designed in accordance with AS2890.3 to provide adequate lighting and weather protection for eight visitor bicycle spaces.

EMM assessment:

Council's DCP does not provide any bicycle parking rate. It refers to 'Planning Guidelines for Walking and Cycling' (NSW Government 2004). Bicycle parking spaces should comply with AS2890.3:1993 Bicycle Parking Facilities.

Section 3 of Council's DCP states that bicycle spaces are to be located to provide convenient access from surrounding bicycle routes and main building entrances. It should not interfere with reasonable access to doorways, loading areas, access covers, furniture, services and infrastructure. The spaces are to be adequately lit during periods of use. Adequate signage will be required.

The plans prepared by the rothelowman indicate that eight staff bicycle spaces will be provided in basement levels 2 and 3 (four spaces in basement 2 and the remaining four spaces in basement 3). However, the TIA does not state how these spaces will be accessed. If these bicycle spaces are to be accessed by goods lifts, it should be clearly demonstrated with the size of the lift.

In regard to ground level bicycle space, the ttp letter shows three bicycle spaces next to the kiosk substation. Total eight spaces will be required for the visitors which should be shown in the plan.

Upon updating the plan, the following conditions could be incorporated as part of the development consent, should this development be approved:

1. All bicycle spaces are to comply with AS2890.3:2015
2. Total eight bicycle spaces to be provided in a secured location which (Class B). Adequate lighting should be provided for these spaces
3. Total eight weather protected bicycle spaces to be provided at the ground level (Class C). These spaces should be easily visible and adequately signposted for its use.

3.6 Car parking compliance with Australian Standards

I could not undertake a full compliance review of the basement car park as I don't have the AutoCAD plan. However, the car park seems to generally compliant with relevant Australian Standard. By reviewing the PDF plans of the basements, there are some design issues which needs to be clarified/resolved:

- Ground level ramp AHD 48.5 at both top and bottom of the 1:12 ramp, this needs to be clarified if this is actually flat as it joins a 1:6 ramp which needs a transition ramp
- At the bottom of the Ground-B1 ramp, the boom barrier needs to be minimum 6 m from the 1:8 ramp (only 3.6 m is provided); and
- There needs to be a turning bay on Basement 3 unless there are no visitor parking spaces in basement.

In summary, compliance of the car park in accordance with Australian Standard could be conditioned as part of the development approval eg issue of Compliance Certificate (CC) and Occupational Certificates (OC) of the car park.

3.6.1 Swept path assessment in Hargrave Street

Section 4.5 of the TIA states that the driveway access for the proposed development would require the removal of one carparking space from the northern side of Hargrave Street. Given the existing site frontage is currently a 'No Stopping' zone, there is no loss of parking for the entering vehicles to the site. However, for the exiting vehicles turning left onto Hargrave Street, it should be clearly demonstrated how many car parking spaces will be lost. It should be clarified by showing the outbound heavy vehicular swept path by inserting a static vehicle east of the driveway. It would demonstrate the number of spaces lost (if any) east of the driveway.

It is recommended that the applicant prepare a sign plan as part of the development approval which will subsequently to be approved by the Local Traffic Committee. Any loss of kerbside parking should be supported by a program of consultation with the affected resident (1 Hargrave Street).

Given only one car parking will be lost, I agree with ttp's justification that this loss of on-street parking would be offset by the additional three spaces being made available on Somerset Street with the removal of the redundant driveways in this street. However, all costs associated to the signage are to be borne by the applicant. This could be conditioned as part of the development application.

3.6.2 Two way vehicular circulation at the driveway

The ttp swept paths undertaken in their letter do not demonstrate whether two simultaneous SRV movements are achievable at the driveway without impeding movement. Once the maximum size of delivery vehicles/ waste collection vehicle is determined, the swept paths should be updated demonstrating two simultaneous heavy

vehicle movements in opposing direction is achievable. Otherwise, if the incoming vehicle (visitor or staff) is required to wait in Hargrave Street, it may cause congestion to the Somerset Street/Hargrave Street roundabout, given that the close proximity of the roundabout and the proposed driveway.

Furthermore, clarification is required, if a vehicle is reversing onto the loading dock, how the incoming vehicular movements to the basement will be managed. There is a potential for traffic congestion and pedestrian/vehicular conflict on Hargrave Street which is not acceptable. This traffic and pedestrian safety issue should be adequately addressed.

3.6.3 Compliance of the disability car parking spaces

As stated in Section 3.2, total six disability car parking spaces will be provided. The ttp TIA acknowledges that some of the disability parking spaces do not comply with the requirements of AS2890.6: 2009 and notes that the layout exceeds the requirements of AS2890.6 for New Zealand, confirming that the spaces are functional and fit for purpose despite not meeting the layout requirements specific for Australia.

I disagree with ttp's assessment of addressing New Zealand car parking standard to be compliant with Australian Standard. In my professional view, all car parking standards should relate to the relevant jurisdiction – i.e. Australian Standards. The plans should be updated and it could be conditioned as part of the development approval.

EMM assessment:

Section 5 (p) of the DCP (Design of Parking and Manoeuvring Areas), states that *the design of car parks should ensure adequate separation of staff/visitor parking and loading dock circulation areas for heavy vehicles*. This DCP requirement is not achieved.

In summary, all traffic and pedestrian safety related concerns should be adequately addressed with updated swept path diagrams.

All car parking spaces should be compliant AS 2980.1, 2890.2 and 2890.6 and this could be a condition of consent. All car parking spaces should be marked for the respective users. Visitor spaces (high turnover) should be 2.6 m wide in accordance with Australian Standard AS2890.1.

3.7 Proposed Taxi Zone in Somerset Street

The development proposes two drop-off/ pick-up zone (No Parking) on Somerset Street, outside the site frontage. The ttp letter justified that the proposed 'No Parking' restrictions would allow their use by the public for drop off and pick up activity, thus they would serve not only the proposed development but the wider precinct.

In total, there are 55.5 m site frontage in Somerset Street where approximately 40 m is available for parking usage due to existing blister island on the eastern side of Sommerset Street, north of Hargrave Street. Assuming, high turnover of these spaces, a space length of 6.7 m will be required in accordance with AS2890.5:1993, equating 13.4 m in total. The location of the 'No Parking' zone should be outlined. The remaining available 26.4 m space should be reinstated as 4P at all times, in accordance with the current parking restriction.

EMM assessment:

I agree with ttp's assessment of provision of two 'No Parking' zones at the Somerset Street frontage as there is a community benefit to this proposal. However, a signage plan should be prepared as part of the development application to be considered at the Local Traffic Committee. No community consultation is required as the entire site frontage belongs to the site, thus no impacts to the adjoining properties. All costs associated to this proposal are to be borne by the applicant.

4 Matters for further investigation

The matters that are not adequately addressed or need further information/ clarification and their magnitude of impact are summarised in Table 4.1.

Table 4.1 EMM peer review

Item	This letter reference	Matter	Inadequacies and shortcomings	EMM recommendations	Category
1	Section 3.1.2	Signage	Prohibit unauthorised access to the car park	Install a sign at the entrance to the car park "Private Parking: Hotel Guests Only"	Minor
2	Section 3.3	Loading dock	Applicant's justification of a single SRV meeting the loading demand for the whole development.	<p>To make a determination on the loading dock, the following information are required from a comparable medi-hotel development for assessment (last three months data):</p> <ul style="list-style-type: none"> • Loading delivery company and type of delivery eg food, beverages, equipment, medication etc • Location of the hotel and number of rooms • Presentence of room occupied • Number of loading dock provided on site • Information on loading dock is shared with waste collection vehicles • Chart of daily loading deliveries for the last three months stating type and dimension of the vehicle, arrival and departure time and overall length of stay, <p>Should be above information adequately justifies that a SRV meeting the loading demand for the site, accept it.</p> <p>A LDMP can be conditioned as part of the DA consent.</p>	Major

Table 4.1 EMM peer review

Item	This letter reference	Matter	Inadequacies and shortcomings	EMM recommendations	Category
3	Section 3.4	Waste collection	Applicant's justification of a single SRV meeting the waste collection demand for the whole development (to be shared with the loading dock).	<p>To make a determination on the loading dock, the following information are required from a comparable medi-hotel development for assessment (last three months data):</p> <ul style="list-style-type: none"> • Duration and timing of the waste collection for each type of waste • Average duration of stay; and • Type of vehicle used and its dimension. <p>Should be above information adequately justifies that a SRV meeting the waste collection demand for the site, accept it.</p> <p>On street waste collection can be prohibited by condition of consent</p>	Major
4	Section 3.5	Bicycle parking	Accessibility of bicycle e spaces, its provision and compliance of parking	<p>The applicant is required to demonstrate how the bicycle spaces will be accessed that are located at the basements. Upon this information, the following conditions could be imposed as part of the DA consent:</p> <ul style="list-style-type: none"> • All bicycle spaces are to comply with AS2890.3:2015 • Total eight bicycle spaces to be provided in a secured location which (Class B). Adequate lighting should be provided for these spaces • Total eight weather protected bicycle spaces to be provided at the ground level (Class C). These spaces should be easily visible and adequately signposted for its use. 	Moderate
5	Section 3.6.1	Loss of parking in Hargrave Street	Loss of parking in Hargrave Street	<p>Update swept path by the longest vehicle accessing the site turning left form the driveway to Hargrave Street.</p> <p>Preparation of a signage plan for consideration by the Location Traffic Committee. All costs associated to this proposal are to be borne by the applicant.</p>	Major
6	Section 3.6.2	Two way circulation at the driveway entrance	Two simultaneous heavy vehicles accessing the driveway	<p>Update the swept path demonstrating two simultaneous opposing heavy vehicle movements is achievable at the driveway.</p> <p>Address pedestrian and vehicular safety issues during reversing of the heavy vehicle on to the loading dock.</p>	Major

Table 4.1 **EMM peer review**

Item	This letter reference	Matter	Inadequacies and shortcomings	EMM recommendations	Category
7	Section 3.6.3	Compliance of the disability parking spaces	Noncompliance of the disability parking.	Update disability car parking spaces to comply with AS 2890.6. Subsequently it can be conditioned that all car parking spaces should be compliant with AS 2890.1, 2 and 6 (Refer to Section 3.6.3). All car parking spaces should be marked for its respective users. Visitor spaces (high turnover) should be 2.6 m wide in accordance with Australian Standard AS2890.1.	Major
8	Section 3.7	Taxi Zone at Somerset Street		Preparation of a signage plan for the 'No Parking' zone on Somerset Street for consideration by the Location Traffic Committee. All costs associated to this proposal are to be borne by the applicant.	Moderate

5 Conclusion/ summary

EMM has been engaged by DPE to undertake a peer review on the onsite car parking provision for the medi-hotel development at 28-32 Somerset Street, Kingswood.

The car parking, disability parking and bicycle parking provisions are generally acceptable, given medi-hotel will primarily serve the outpatients and their relatives associated with Nepean public and private hospital. However, it is undetermined whether the loading and waste collection could be completed smoothly for the proposed hospital without impeding the traffic operation on the adjoining public streets. Furthermore, there are some design issues which need to be updated for compliance with the relevant Australian Standards. The outcome of the peer review is summarised in Table 4.1.

I trust this peer review satisfy the needs of your requirements for determination of the proposed development, in relation to parking. However, if you have any questions, please don't hesitate to contact me on 0425 478 650.

Yours sincerely



Abdullah Uddin

Associate Traffic Engineer

auddin@emmconsulting.com.au