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URBIS

SUBMISSIONS REPORT

Alexandria Health Centre

SSD-38600121

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Report Number	Final for submission - 20221026

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EXECUTIVE SUMMARY

This Submissions Report relates to the proposed Alexandria Health Centre at 28-32 Bourke Road, Alexandria. On behalf of Centuria (**the Applicant**), this Submissions Report has been prepared to address the matters raised by DPE, public agencies and local Council throughout the public exhibition period.

The State Significant Development Application (**SSDA**) was lodged with the Department of Planning and Environment (**DPE**) in July 2022 (SSD- 38600121). The SSDA was placed on public exhibition from 22 July 2022 to 18 August 2022.

This Submissions Report has been prepared in accordance with the DPE *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) November 2021*.

Overview of Submissions

The SSDA was publicly exhibited from 22 July 2022 to 18 August 2022. There were eight (8) submissions received from public agencies, including:

- NSW government agencies:
 - Department of Planning and Environment – Environment and Heritage Group
 - Sydney Water
 - Fire and Rescue NSW
 - Ausgrid
 - Transport for NSW
 - Sydney Airport Corporation
- City of Sydney Council (Council)
- No submissions from the public.

DPE issued a letter to the Applicant on 23 August 2022 requesting the preparation of a Response to Submissions.

This Submissions Report has been prepared to respond to each of the submissions and the DPE correspondence in a holistic manner. The submissions from public authorities and the public have been categorised in a systematic way and in accordance with current DPE guidelines.

A response to each of the stakeholder submissions is provided within **Section 4**.

Actions Taken Since Exhibition

Since the SSDA was publicly exhibited, the Applicant has undertaken further consultation with DPE and Council to discuss the issues raised within their submissions. The Applicant met with City of Sydney Council on 7 September 2022.

Additional assessments have also been prepared to respond to the issues raised within the submissions and are attached to this report. These include:

- Detailed maps and plans
- Additional Architectural Plans that clarify the concept envelope
- Amended Landscape Plans
- Interim audit advice
- Amended Preliminary Art Strategy
- Amended ESD Report
- Amended Arborist Report.

Response to Submissions

Section 4 of this Submissions Report provides a detailed response to each matter raised by the various public agencies.

In summary, a majority of the City of Sydney submission related to detailed design of the reference scheme rather than the concept envelope for which consent is being sought as part of this SSDA. Many of the matters relating to the detailed design of the future development will be subject to a design competition and to be documented as part of the subsequent detailed SSDA.

It is also noted that under section 2.10 of the *State Environmental Planning Policy (Planning Systems) 2021*, Development Control Plans (DCPs) do not apply to State Significant Development. Nevertheless, the concept envelope has been designed to reflect the provisions of the Sydney DCP 2012, and as summarised below, the design competition brief for the detailed design of the future development has been prepared to include requirements to address the provisions of the Sydney DCP 2012.

A summary of the key issues and responses is provided below.

▪ Traffic:

- **Comment:** The traffic assessment must model the impacts on the future road network (excluding unfunded long term road network scenarios) and provide an assessment of the existing and proposed operations of the Wyndham Street / Bourke Road / Bourke Street / Botany Road intersections.
- **Response:** These traffic signals operate with some 25 cycles per hour so the additional vehicles will represent 1 vtpd every 2.5 cycles and such a miniscule number (even if it were 10 vtpd per cycle) would not have any perceptible impact on the level of service or queueing at these intersections. Therefore, additional modelling is not required.
- City of Sydney Council confirmed via email on 11 October 2022 that Council's Transport Planner has reviewed and supports the proponent's response above. Council confirmed that the traffic impacts are minor enough that they will not create unreasonable impacts to the surrounding intersections.

▪ Urban Design:

- **Comment:** Council does not support the proposed architectural screen and this should be removed from the concept proposal.
- **Response:** The purpose of the Concept SSDA is to seek approval for the concept envelope which reflects the built form provisions of Sydney DCP 2012 Southern Enterprise Area (Section 5.8). The concept envelope includes a 4-storey street wall in accordance with the Sydney DCP 2012 provisions. The reference scheme (which shows an architectural screen) is one option for how the site could be developed within the concept envelope. However, the reference scheme does not represent the final built form outcome for the site, which will be subject to a design competition and will be documented as part of a separate detailed SSDA. As part of the design competition brief, competitors will be required to address the provisions of the Sydney DCP 2012, including the requirement for a street wall.

▪ Landscaping:

- **Comment:** Deep soil planting to be provided to 10% of the site in accordance with the Sydney DCP 2012 provisions.
- **Response:** The purpose of the Concept SSDA is to seek approval for the concept envelope which reflects the built form provisions of Sydney DCP 2012 Southern Enterprise Area (Section 5.8). In response to Council's submission, the architectural design competition brief (currently being developed) has been prepared to require competitors to address the provisions of the Sydney DCP 2012.

▪ Western laneway:

- **Comment:** The proposal includes two stages for the future development of the site. It is noted that the options for stage 2 do not meet the intent of the DCP for the treatment and use of these laneways as 6 metre wide, shared laneways with one-way vehicular traffic.

- **Response:** A meeting with Council's City Design Team occurred on 7 September 2022 to discuss the current and future the laneway design. It was acknowledged by Council that in the short to medium term (Stage 1 - i.e. before the full length of Council's DCP laneway is developed), vehicle ingress/egress for the site would need to occur at its western boundary, as documented in the Concept SSDA. At the meeting, Council officers acknowledged that the proposed vehicle ingress/egress laneway solution for the Concept SSDA was acceptable and not in contention.
- In terms of the long-term design for the laneway (Stage 2 - i.e. when the neighbouring sites are developed and land dedication occurs to construct the full length of the laneway), we understand Council would like the final laneway design to reflect the DCP intent of a shared laneway with one-way vehicular traffic. Ongoing discussions are occurring with City of Sydney on this matter, which will be documented as part of the Detailed SSDA.

▪ **Contamination:**

- **Comment:** The Detailed Environmental Site Investigation (DESI) concludes that the site is not suitable for ongoing commercial/ industrial land use due to the significant lead contamination. The DESI must be amended to address all gaps that are outlined in the Interim Audit Advice 01, by NSW EPA Site Auditor Rod Harwood, dated 8 June 2022. The amended DESI and a bespoke Remediation Action Plan must be prepared and be peer reviewed by a NSW EPA Accredited Site Auditor and include a section B Site Audit Statement or a letter of Interim advice from the Site Auditor certifying that the RAP is practical and the site will be suitable after remediation for the proposed use.
- **Response:** The high levels of contamination were restricted to the fill material where it was detected, which will reduce the volumes of soil required to be removed. This will be confirmed with further sampling during remediation works. An updated Interim Audit Advice (dated 24 June 2022) is provided at **Appendix F**. In the latest Interim Audit Advice, the Remediation Action Plan (V3) has been approved by the Auditor.

▪ **Flooding and stormwater:**

- **Comment:** Flood Study must include a post development flood study to demonstrate that new development will not significantly adversely affect flood behaviour resulting in detrimental increases in the potential flood affectation of other development or properties. Council also raised the need for further design detail on the new road along the western boundary as well as master grading for the wider DCP laneway network.
- **Response:** Enstruct have confirmed that the footprint of the proposed development closely matches the existing conditions on the site. The proposed development does not impact on any overland flow routes. As a result, the existing conditions and proposed conditions flood models are identical. The proposed development does not have any impact on flooding. The ultimate conditions model including the proposed laneway network between Bourke Road and O'Riordon Street will be prepared in consultation with City of Sydney Council to be documented as part of the detailed SSDA.
- A high level concept grading has been undertaken by Enstruct which confirms that no further flood controls are required on the southern side of the subject site. The project team will continue to work with Council officers to prepare the detail of the master grading and the longitudinal and long sections of the laneways to be documented as part of the detailed SSDA once the details of the winning competition scheme are available. The proponent and project team will undertake further flooding and stormwater analysis ensuring the laneways remain flood free to define the mastergrading required for the site and future detailed design of the development.
- Following the design competition, the winning scheme will be developed in conjunction with input from the project Flooding and Stormwater Engineer (Enstruct), and Council, to document the mastergrading of the broader laneway network and the detailed levels of the proposed building.

Detailed responses to the matters raised by City of Sydney and the other public agencies are provided in **Section 4** below.

Updated Justification and Evaluation

The report and the supporting documents have been informed by additional consultation and engagement with key stakeholders, including the Department of Planning and Environment and City of Sydney. Overall, it is considered the updated proposal is acceptable having regard to the relevant biophysical, economic and social considerations. Further:

- The proposal is aligned with the strategic policy objectives as it will provide an essential mental health hospital and medical centre occupied by allied health providers to support the rapid growth in the surrounding precinct.
- The proposal will improve the urban realm experience by providing landscaping features, larger setbacks, through site links and places to stay and sit. The improved urban realm will have a high positive impact on local residents and future patients, visitors and staff who use and work within the proposed facility.
- The proposed use of the site as a hospital and medical centre will provide a key piece of community infrastructure will service the broad community. The facility will provide unique services targeted at privately insured patients aged 18 + with mood disorders. Anxiety disorders, and those with comorbid drug and alcohol disorders. The facility will provide both inpatient and outpatient services to suit the specific needs of the patients.

Having considered all relevant matters, the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

1. INTRODUCTION

This Submissions Report relates to the proposed Alexandria Health Centre at 28-32 Bourke Road, Alexandria. On behalf of Centuria (**the Applicant**), this Submissions Report has been prepared to address the matters raised by DPE, public agencies and local Council throughout the public exhibition period.

The State Significant Development Application (**SSDA**) was lodged with the Department of Planning and Environment (**DPE**) in July 2022 (SSD- 38600121). The SSDA was placed on public exhibition from 22 July 2022 to 18 August 2022.

This Submissions Report has been prepared in accordance with the DPE *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) November 2021*.

1.1. EXHIBITED PROJECT

Development consent is sought for a concept proposal for the 'Alexandria Health Centre' comprising medical centre uses and anchored by a mental health hospital. Specifically, the application seeks concept approval for:

- In principle arrangements for the demolition of existing structures on the site and excavation to accommodate a single level of basement car parking (partially below ground level).
- A building envelope to a maximum height of 45 m (RL 53.41) (including architectural roof features and building plant). The podium will have a maximum height of RL 28.41.
- A maximum gross floor area of 11,442.20 sqm, which equates to a maximum FSR of 3.85:1. The total FSR will comprise a base FSR of 2:1, a community infrastructure bonus FSR of 1.5:1 and a 10% design excellence bonus FSR (subject to a competitive design alternatives process).
- Indicative use of the building as follows:
 - Mental health hospital at levels 5-7.
 - Medical centre uses levels 1-4; and
 - Ground level reception/lobby and pharmacy.
- Principles for future vehicular ingress and egress from Bourke Road along the site's western frontage.
- Subject to agreement on a public benefit offer submitted with this application, the proposal includes the indicative dedication of the following land to Council as envisaged by the Draft Sydney Development Control Plan 2012 – Southern Enterprise Area Amendment (Draft DCP):
 - A 2.4m wide strip of land along the site's frontage to Bourke Road for the purpose of footpath widening
 - A 3m wide lane along the site's western boundary contributing towards a 6m wide lane (it is noted that the concept proposal will allocate an additional 3 m strip of land within the site along the western boundary to enable two-way vehicle movement into and out of the site).
 - A 3m wide lane along the site's southern boundary, contributing towards a 9m wide lane.

1.2. SUPPORTING DOCUMENTATION

This Submissions Report is supported by the following technical reports and documentation.

Table 1 Supporting documentation

Report	Date	Consultant	Purpose of the report	Appendix
Submissions Register	October 2022	Urbis	-	Appendix A
Updated mitigation measures	October 2022	Urbis	-	Appendix B
Detailed map	6 October 2022	Urbis	In readable format	Appendix C
Architectural Plans	7 October 2022	NBRS	To clarify concept plans for approval and reference design for information	Appendix D
Amended Landscape Report and Plans	October 2022	Place Design Group	Updated to reflect City of Sydney comments	Appendix E
Updated Interim audit advice	24 June 2022	EP Risk	The Remediation Action Plan (V3) has been approved by the Auditor.	Appendix G
Updated Preliminary art strategy	September 2022	UAP	Updated to reflect City of Sydney comments	Appendix H
Updated ESD Report	5 October 2022	LCI Consultants	Updated to reflect City of Sydney comments	Appendix I
Updated Arborist Report	13 October 2022	Arboreport	Updated to reflect City of Sydney comments	Appendix J
Statutory Compliance Table	October 2022	Urbis	Minor typos corrected	Appendix K
SES Response	4 October 2022	SES	SES Response for reference	Appendix L

2. ANALYSIS OF SUBMISSIONS

This section provides a summary of the submissions received including a breakdown of respondent type, nature/ position and number of submissions received.

2.1. BREAKDOWN OF SUBMISSIONS

The SSDA was publicly exhibited from 22 July 2022 to 18 August 2022. There were eight (8) submissions received from public agencies (including Department of Planning and Council).

All submissions were managed by DPE, which included registering and uploading the submissions onto the 'Major Projects website' (SSD-38600121). A breakdown of the submissions made by group and issues raised is provided in the table below.

Table 2 Breakdown of Submissions Received

Submitter	Category of Issues Raised						
	The Project	Procedural Matters	Impacts			Justification and Evaluation of the Project	Issues Beyond the Scope of the Project
			Economic	Environmental	Social		
Department of Planning and Environment		X		X			
Public Authorities (State or Commonwealth Agencies and Council)							
City of Sydney Council				X		X	
DPE – Environment and Heritage Group				X			
Sydney Water	<i>No concerns raised</i>						
Fire and Rescue	<i>No concerns raised</i>						
Ausgrid	<i>No concerns raised</i>						
Transport for NSW	<i>No concerns raised</i>						

Submitter	Category of Issues Raised						
	The Project	Procedural Matters	Impacts			Justification and Evaluation of the Project	Issues Beyond the Scope of the Project
			Economic	Environmental	Social		
Sydney Airport Corporation	No concerns raised						
Stakeholder Groups or Individuals							
No submissions were received from stakeholder groups or individuals.							

2.2. CATEGORISING KEY ISSUES

Since only a relatively modest number of individual submissions were received, a separate response has been provided to each within the Response to Submissions at **Section 4**. The key issues raised in the submissions include:

Economic, environmental and social impacts:

- **Built form:**
 - Council provided detailed comments relating to the architectural screen, deep soil, laneway setbacks and other elements of the reference design. Council comments also highlighted DCP requirements for deep soil, canopy cover, waste management and public art.
- **Traffic:**
 - Council requested further information regarding the traffic assessment.
- **Flooding:**
 - Council and the Department of Planning and Environment (Environment and Heritage) requested further information on the flood study.
- **Arborist:**
 - The Arborist Report requires further details regarding tree protection zones and the amount of pruning required.
- **Contamination:**
 - Council requested an updated Interim Audit advice.

3. ACTIONS TAKEN SINCE EXHIBITION

3.1. FURTHER ENGAGEMENT

Since the public exhibition of the SSDA, the Applicant has undertaken further consultation with City of Sydney Council, as outlined in the section below.

3.1.1. City of Sydney

Further discussions have occurred with the City of Sydney regarding their built form and detailed design comments. It was clarified that the proposed concept envelope is aligned with Council's LEP and DCP built form controls.

The purpose of the Concept SSDA is to seek approval for the concept envelope which reflect the provisions of Sydney DCP 2012 Southern Enterprise Area.

The project team met with the City of Sydney Council on 7 September 2022 to discuss the proposal and the City of Sydney's submission. The key issues discussed within the meeting and a summary of the associated responses are provided below.

Flooding

During the meeting on the 7 September, the project team discussed the master grading requirements for the site. It was agreed that this would be addressed as part of the design detail for the Detailed SSDA.

In the meantime, the proponent and project team will undertake further flooding and stormwater analysis to define the master grading required for site and future development.

For the purposes of the design competition, flood planning levels have been defined in the design competition brief which competitors will need to address. Following the design competition, the winning scheme will be further refined in conjunction with the flooding and stormwater analysis to document the master grading and final levels of the building design.

A further discussion occurred on 21 October 2022 between the project flooding engineer (Enstruct) and Council's City Design officer to discuss the laneway grading and the response set out in **Section 4.2** below in relation to levels and gradients.

Laneways

A meeting with Council's City Design Team occurred on 7 September 2022 to discuss the laneway design. It was acknowledged by Council that in the short to medium term (Stage 1 - i.e. before the full length of laneway is developed), vehicle ingress/egress for the site would need to occur at its western boundary, as documented in the Concept SSDA.

In terms of long-term design for the laneway (Stage 2 - i.e. when the neighbouring sites are developed and land dedication occurs to construct the full length of the laneway), we understand Council would like the final laneway design to reflect the DCP intent of a shared laneway with one-way vehicular traffic.

Ongoing discussions are occurring with City of Sydney on this matter, which will be documented as part of the Detailed SSDA.

Traffic Assessment

Council requested additional traffic modelling to include at least the Wyndham Street / Bourke Road / Bourke Street / Botany Road intersections (networked to capture queueing), as well as Bowden / Bourke Streets.

City of Sydney Council confirmed via email on 11 October 2022 that Council's Transport Planner reviewed the assessment and supported the Proponent's logic. Council confirmed that the traffic impacts are minor enough that they will not create unreasonable impacts to the surrounding intersections.

3.1.2. Department of Planning and Environment

Urbis spoke to DPE on 27 September 2022 regarding the submitted architectural plans. As agreed with DPE, an updated set of plans has been provided with this Submissions Report that clarify the concept envelope (for approval) and the reference design (for information). It is noted that no changes are proposed to the

envelope or project description of the SSDA as submitted, so this will not be an amendment to the application.

3.2. ADDITIONAL IMPACT ASSESSMENT

3.2.1. Flooding

Enstruct have considered 3 scenarios:

- existing conditions (the site now);
- proposed conditions – the development of the subject site only; and
- ultimate conditions – the development of the subject site plus opening of the laneway network.

Enstruct's flood studies have shown the proposed conditions are the same as existing conditions. The proponent and project team will undertake further flooding and stormwater analysis to define the mastergrading required for the site and future development. Enstruct have contacted SES, seeking their input. SES' feedback has been received and is addressed under Section 4.2.

The reference scheme has been designed to meet the flooding requirements with respect to basement entries and openings. The flood planning levels have been nominated in the Design Competition Brief. Flood level details will be developed in relation to the winning competition scheme and documented within the detailed SSDA submission.

3.2.2. Contamination

Updated Interim Audit Advice (dated 24 June 2022) is provided at **Appendix F**. In the latest Interim Audit Advice, the Remediation Action Plan (V3) has been approved by the Auditor.

4. RESPONSE TO SUBMISSIONS

4.1. DEPARTMENT OF PLANNING AND ENVIRONMENT

Item	Issue	Response																								
1.	The design of the envelope and reference scheme and any future design brief for the design competition must appropriately consider the design controls in Council's draft SDCP 2012 Southern Enterprise Area, particularly in relation to the envisaged streetscape and laneway network.	<p>Noted and accepted</p> <p>A draft design competition brief has been prepared which requires compliance with Council's SDCP 2012 Southern Enterprise Area. The design competition brief has been issued to GANSW and Council's Design Excellence Team for review and comment. The concept envelope aligns with the Sydney LEP and DCP.</p>																								
2.	The traffic assessment must model the impacts on the future road network (excluding unfunded long term road network scenarios) and provide an assessment of the existing eand proposed operations of the Wyndham Street / Bourke Road / Bourke Street / Botany Road intersections.	<p>TTPA have assesed the traffic generation of the proposal. The anticipated traffic generation is 50 vehicle trips per hour (vtph) in the morning and 58 vtph in the evening.</p> <p>It is estimated that the current vehicle generation from the tyre and wheel business is 30 vtph. Therefore, an additional generation of 20 vtph in the AM and 28 vtph in the PM in expected.</p> <p>It is assessed that the directional distribution will be 40% to/from the south on Bourke Road and 60% to/from the north. Accordingly the additional vehicle movements to/from the north will be:</p> <table><tr><th colspan="2">AM</th><th colspan="2">PM</th></tr><tr><td>IN</td><td>OUT</td><td>IN</td><td>OUT</td></tr><tr><td>9</td><td>3</td><td>7</td><td>10</td></tr></table> <p>Of the vehicles egressing to the north 50% will use the left turn slip lane to Wyndham Street so the additional vehicle trips through Wyndham Street and Botany Road intersections would be:</p> <table><tr><th colspan="2">AM</th><th colspan="2">PM</th></tr><tr><td>IN</td><td>OUT</td><td>IN</td><td>OUT</td></tr><tr><td>9</td><td>2</td><td>7</td><td>5</td></tr></table> <p>These traffic signals operate with some 25 cycles per hour so the additional vehicles will represent 1 vtph every 2.5 cycles and such a miniscule number (even if it were 10 vtph per</p>	AM		PM		IN	OUT	IN	OUT	9	3	7	10	AM		PM		IN	OUT	IN	OUT	9	2	7	5
AM		PM																								
IN	OUT	IN	OUT																							
9	3	7	10																							
AM		PM																								
IN	OUT	IN	OUT																							
9	2	7	5																							

Item	Issue	Response
		<p>cycle) would not have any perceptible impact on the level of service or queueing at these intersections.</p> <p>Given the above, it is submitted that additional modelling of the proposed operations of Wyndham Street / Bourke Road / Bourke Street / Botany Road intersections is not required.</p> <p>City of Sydney Council confirmed via email on 11 October 2022 that Council's Transport Planner reviewed the assessment and supported the Proponent's logic. Council confirmed that the traffic impacts are minor enough that they will not create unreasonable impacts to the surrounding intersections.</p>
3.	Provide detailed plans and maps from Appendix B in a readable format.	A detailed map has been provided in a readable format at Appendix C .

4.2. CITY OF SYDNEY COUNCIL

Item	Issue	Response
1. Street wall and interface with Bourke Road	<p>The City does not support the proposed architectural screen and this should be removed from the concept proposal.</p> <p>If the 4 storey street frontage height is not pursued, then the following issues must be resolved:</p> <ul style="list-style-type: none"> ▪ The proposed lift at the front of the site on Bourke Road is not supported. This area is flood prone and is therefore a poor location for a lift. Further, the City considers these types of lifts to be a very poor way of providing equitable access for all people and this is particularly problematic given the use of the building as a hospital. As a minimum, the lift should be relocated to be inside the building. Alternatively, replacing the lift with a ramp system inside the building would provide a far superior outcome for future users of the site. ▪ The power supply kiosks must be relocated. They are currently located within the deep soil zone and in a flood prone part of the site. ▪ The deep soil zone must be increased (see Point 4 below) and the basement wall facing Bourke Road will need to be relocated. ▪ The architectural screen must be removed. 	<p>Noted.</p> <p>Further discussions have occurred with City of Sydney regarding Council's submission to clarify that the proposed concept envelope is aligned with Council's planning controls – albeit that the reference scheme prepared by NBRIS shows one architectural solution which includes the architectural screen.</p> <p>The purpose of the Concept SSDA is to seek approval for the concept envelope which reflect the provisions of Sydney DCP 2012 Southern Enterprise Area. The reference scheme (which shows an architectural screen) is one option for how the site could be developed within the concept envelope. However, the reference scheme does not represent the final built form outcome for the site, which will be subject to a design competition and will be documented as part of a separate detailed SSDA. As part of the design competition brief, competitors will be required to address the provisions of the Sydney DCP 2012, including the requirement for a street wall.</p> <p>Following recent discussions with GANSW and Council's Design Excellence Team on 18 October 2022, the design competition brief is currently being updated to remove references to the reference scheme from the brief, to give competitors clear direction on design approach based on the concept envelope and Council's LEP and DCP controls.</p> <p>The Concept SSDA does not seek approval for the reference scheme. The detailed design will be subject to a design competition and addressed as part of the Detailed SSDA submission.</p>

Item	Issue	Response
		<p>In relation to the Sydney DCP 2012 requirements for Deep Soil, Canopy Cover etc, it is noted that these requirements do not strictly apply to an SSDA (per clause 2.10 of <i>State Environmental Planning Policy – Planning Systems 2021</i>). Nevertheless, in response to Council’s submission, the architectural design competition brief (currently with GANSW for review) has been prepared to make it clear to the competitors:</p> <ul style="list-style-type: none"> ▪ The importance of a street wall ▪ Need to address requirements for deep soil, accessibility lift access, power supply kiosk locations etc in scenarios where a street wall is not being provided. <p>An updated set of Concept Envelope Plans (for approval) and Reference Scheme Design (for information) are provided (Appendix D) to clarify the intent of the Concept SSDA more clearly (i.e. clearly highlight concept envelope plans for consent and reference design drawings for information).</p>
2. Urban Design	<p>The western and southern walls of the proposed building are to define the proposed laneway network. This does not occur on the western boundary because the cantilever of the upper levels over the driveway weakens the definition of the lane.</p> <p>The western and southern walls of the proposed building are to define the proposed laneway network. This does not occur on the western boundary because the cantilever of the upper levels over the driveway weakens the definition of the lane.</p>	<p>Noted and accepted – design detail subject to the design competition and to be documented as part of the detailed SSDA.</p> <p>It is highlighted that the Concept SSDA seeks approval for a concept envelope that goes to the boundaries of the site (after dedication), including the north, west and south boundaries.</p> <p>The Concept SSDA does not seek approval for the reference scheme. The detailed design will be subject to a design competition and addressed as part of the Detailed SSDA submission.</p> <p>In relation to the Sydney DCP 2012 , it is noted that its provisions do not strictly apply to an SSDA. Nevertheless, in response to</p>

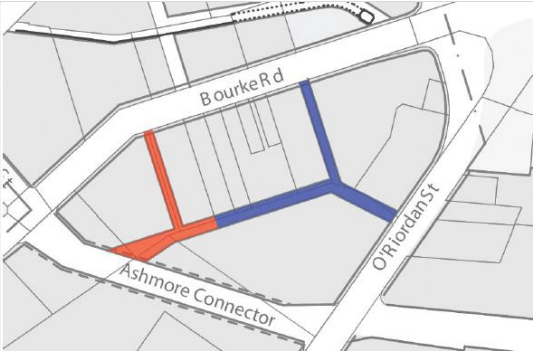
Item	Issue	Response
		Council's submission, the architectural design competition brief (currently being developed) has been prepared to note that 'competitors should explore opportunities for the western and southern walls of the proposed building to define the laneway network with minimum/nil setbacks, cantilevers and colonnades as envisaged in the Sydney DCP 2012.'
	The colonnade created by the large upper levels over the northern and part western boundaries is not appropriate. The building is a stand alone building and not part of a continuous colonnade. The building should come straight to the ground.	As above
	The southern boundary wall is to define the proposed laneway network. The 500mm setback for greenery is not supported and the building should be located on the boundary.	As above
3. Western laneway	<p>The draft SDCP 2012 Southern Enterprise Area requires future laneway dedications on the western and southern boundaries of the site. The draft DCP controls intend for these laneways to be shared zones with pedestrian priority and oneway for vehicles (north towards Bourke Road).</p> <p>The proposal includes two stages for the future development of the site. It is noted that the options for stage 2 do not meet the intent of the DCP for the treatment and use of these laneways as 6 metre wide, shared laneways with oneway vehicular traffic. The City will continue to engage in discussions with the applicant on this matter.</p>	<p>Noted - design detail to be documented as part of the detailed SSDA.</p> <p>A meeting with Council's City Design Team occurred on 7 September 2022 to discuss the laneway design. It was acknowledged by Council that in the short to medium term (Stage 1 - i.e. before the full length of laneway is developed), vehicle ingress/egress for the site would need to occur at its western boundary, as documented in the Concept SSDA.</p> <p>In terms of long term design for the laneway (Stage 2 - i.e. when the neighbouring sites are developed and land dedication occurs to construct the full length of the laneway), we understand Council would like the final laneway design to reflect the DCP intent of a shared laneway with one-way vehicular traffic.</p> <p>Ongoing discussions are occurring with City of Sydney on this matter, which will be documented as part of the Detailed SSDA.</p>

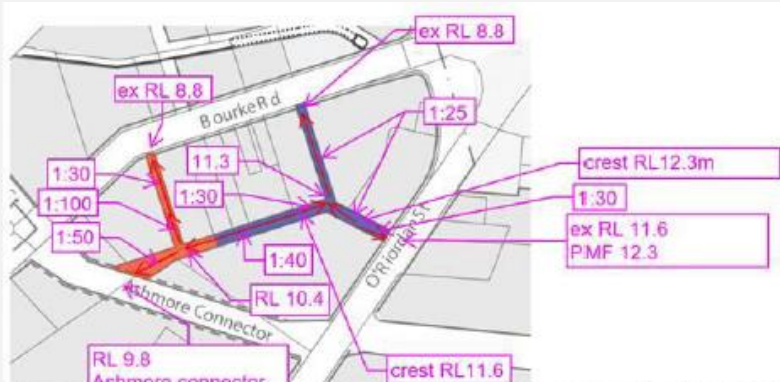
Item	Issue	Response
4. Landscape	<p>Deep soil</p> <p>Provision 5.8.4.6.1 of the draft SDCP 2012 Southern Enterprise Area requires deep soil planting to be provided to 10% of the site. Deep soil is a landscaped area with a minimum dimension of 3 metres that is unimpeded.</p> <p>The envelope plan is to be amended locating a minimum of 10% deep soil and provide an alternate location for substations. Once this is updated, the envelope plans should be stamped and a concept condition imposed that ensures that 10% of the total site area (after dedication) achieves deep soil in accordance with the SDCP 2012 and a plan must be submitted demonstrating this prior to the issue of a design competition brief/ detailed development application.</p>	<p>Noted – design detail subject to the design competition and to be documented as part of the detailed SSDA</p> <p>The site is constrained by a narrow street frontage, requirements for vehicle and parking access to service the hospital use, and laneway dedications required by Sydney DCP 2012. The design of the building is also constrained by the floor plates required to operate as a health care facility.</p> <p>The reference design was developed balancing the above constraints as a potential deep soil solution that can be accommodated within the concept envelope.</p> <p>The preference to concentrate deep soil along the Bourke Road frontage is to maximise impacts on the pedestrian environment and the arrival to site for building users.</p> <p>The reference scheme indicates 136m² of deep soil (5.3% of site area post dedication) can be achieved, which is supplemented by an additional 227m² landscaped areas at the front of the building and 700m² of elevated landscaped areas on the upper levels.</p> <p>The design competition brief will encourage competitors to maximise deep soil zones with reference to the Sydney DCP controls.</p> <p>In relation to the Sydney DCP 2012, it is also noted that its provisions do not strictly apply to an SSDA. Nevertheless, in response to Council's submission, the architectural design competition brief (currently being developed) has been prepared to note the following:</p> <p><i>'It is noted that the section 5.8.4.6.1 of the Sydney DCP 2012 requires deep soil planting to be provided to 10% of the site.'</i></p>

Item	Issue	Response
		<p><i>Where 10% is not achievable, the DCP includes provisions for on structure plantings such as green roofs and solar panels (refer to section 5.8.4.6.1 and Schedule 9 of the Sydney DCP 2012 for further details).</i></p> <p><i>While the DCP provisions do not statutorily apply to State Significant development applications, competitors are encouraged to maximise deep soil where possible, up to 10% of the site area, and where this is not possible, explore opportunities for green roofs and solar panels.</i></p> <p><i>It is noted that roof space is likely to be constrained by hospital plant and servicing requirements which will need to be accommodated along with any area allocated to green roof or solar panels.'</i></p>
	<p>Green roof</p> <p>If there is a minor deep soil shortfall, the proposal must provide an inaccessible and extensive green roof to a minimum 30% of the available rooftop space, as required by Section 5.8.4.6.2 of the draft SDCP 2012 Southern Enterprise Area.</p>	As above
	<p>Landscape on slab</p> <p>The success of landscape on slab requires great design, coordinated services, soil depth and soil volume, drainage, watering systems and ongoing maintenance. In the Stage 2 DA, all landscape on slab for all planters and freestanding pots must be designed to design to ensure landscape areas on slab achieve the minimum soil depths and soil volumes in accordance with the Sydney Landscape Code Volume 2.</p>	<p>Noted and accepted – detail subject to the design competition and to be documented as part of the detailed SSDA</p> <p>High quality landscape areas are a key therapeutic requirement for the mental health service which will have a significant impact on patient wellbeing and recovery. This requirement has been included in the design competition brief.</p>

Item	Issue	Response
	<p>Urban canopy</p> <p>The development should provide 15% canopy coverage of the site within 10 years from the completion of development, per Section 3.5.2 of the SDCP 2012.</p>	<p>Noted - detail subject to the design competition and to be documented as part of the detailed SSDA</p> <p>In relation to the Sydney DCP 2012, it is noted that its provisions do not strictly apply to an SSDA. Nevertheless, in response to Council's submission, this requirement has been included in the design competition brief currently being prepared and competitors will be encouraged canopy cover on the site where possible.</p>
	<p>Artificial turf</p> <p>The City recommends a full review of surface finishes and limiting the use of synthetic surface materials (turf and modular timber decking) and allowing for natural surfaces and natural shade.</p>	<p>Noted and accepted - design detail will be documented as part of the detailed SSDA</p> <p>The amended Landscape Plans (Appendix E) show surface finishes have been updated exclude synthetic turf and specify natural materials. This detail will be documented as part of any Detailed SSDA for the site.</p>
	<p>Landscape strategy</p> <p>It is recommended that the supporting landscape strategy (Appendix K) be updated to relate to the amended envelope. It notes areas of deep soil, locations of communal open space and setbacks.</p> <p>When this is updated, it is recommended that the landscape strategy be attached to the design competition brief and a condition be imposed on the concept SSD to reference the landscape strategy.</p>	<p>Noted and accepted</p> <p>Levels, planting and construction details have been removed from the Landscape package and a landscape strategy has been prepared, refer to Appendix E.</p>
5. Public domain	<p>Flood assessment</p> <p>The Flood Study must include a post development flood study to demonstrate that new development will not significantly adversely affect flood behaviour resulting in detrimental</p>	<p>Enstruct have confirmed that the footprint of the proposed development closely matches the existing conditions on the site. The proposed development does not impact on any overland flow routes. As a result, the existing conditions and proposed conditions</p>

Item	Issue	Response
	increases in the potential flood affectation of other development or properties.	<p>flood models are identical. The proposed development does not have any impact on flooding.</p> <p>The ultimate conditions model including the proposed laneway network between Bourke Road and O’Riordon Street will be prepared in consultation with City of Sydney Council, to be documented as part of the detailed SSDA.</p>
	<p>Levels and gradients</p> <p>The EIS has referenced the Detailed Maps and Plans in Appendix B, however Appendix B has not been provided to the City. The following information is required:</p> <ul style="list-style-type: none"> ▪ A longitudinal section is required for the new road along the western boundary. ▪ An additional long section is to be taken from the ridge point of Bourke Road and continue through the centre line of a new road (required further east from the site) to the above long section. ▪ Sections must include existing and proposed levels and must indicate longitudinal gradient/slope and vertical curve. ▪ The City has previously advised the applicant in preapplication discussions of the minimum extent of master grading work that will need to be undertaken to support future development on the site (shown in red in the figure below). In addition to this, the above mentioned longitudinal master grading exercise will need to be undertaken for the entire block, as shown in blue below. 	<p>Noted - detail will be documented as part of the detailed SSDA</p> <p>A meeting with Council’s City Design Team occurred on 7 September 2022 to discuss the mastergrading requirements for the site. It was agreed that this would be addressed as part of the design detail for the Detailed SSDA.</p> <p>A further discusison occurred on 21 October 2022 between the project flooding engineer (Enstruct) and Council’s City Design officer to dicuss the laneway grading and the response set out below.</p> <p><i>The FPL have been set based on City of Sydney interim floodplain management policy. Given the poposed dvelopment use as a medical facility, the resultant FPL is the PMF for any habitable floors of the building. In additional, all basement entries (car ramp, lifts, stairwells and ventilation) are above the PMF. This has been addressed in the Civil Engineering Report.</i></p> <p><i>Our review of site levels based on ground levels of the proposed Ashmore Connector in the flood model shows an appoximate grade of 2% between the proposed development and the Ashmore Connector, falling to the west. Further to this, the laneway grade can vary between 3.3% and 1% between the southwest corner of the site, and Bourke Road, falling to the north. These grades are relatively gentle (maximum grade of 5% for DDA access). Our</i></p>

Item	Issue	Response
		<p>review indicates the laneway grading will comfortably meet existing and proposed levels on Bourke Road and the proposed Ashmore Connector.</p> <p>We have assumed the following principles will be adopted in the future laneway network design:</p> <ul style="list-style-type: none"> • The connection to O'Riordan Street will be designed such that flood water will not be conveyed from O'Riordan Street through to Bourke Road. Should flood water be conveyed through the proposed laneways to Bourke Road, this would increase flooding on Bourke Road, which is an unacceptable outcome. Furthermore, this would result in poor outcomes for the precinct, with flood controls required for properties with access to the laneway network (including the subject site). • Longitudinal grades on the network should be designed to achieve DDA access where possible (ie, flatter than 1:20) <p>Enstruct have undertaken a high level concept grading of the network (refer figure below) that achieves the above outcomes. On this basis, no further flood controls are required on the southern side of the subject site.</p> <p>In order to prepare detailed long sections, we require the design of the Ashmore Connector from Council in order to set the level at the western end of the laneways. These detailed longitudinal sections will be provided as part of the Stage 2 detailed SSDA.</p> <p>For the purposes of the design competition, flood planning levels have been defined in the design competition brief which competitors will need to address.</p>

Item	Issue	Response
		<p>The proponent and project team will undertake further flooding and stormwater analysis ensuring the laneways remain flood free to define the mastergrading required for the site and future detailed design of the development.</p> <p>Following the design competition, the winning scheme will be developed in conjunction with input from the project Flooding and Stormwater Engineer (Enstruct), and Council, to document the mastergrading of the broader laneway network and the detailed levels of the proposed building.</p>  <p>Figure 2 Required master grading work (shown in red) and longitudinal grading (shown in blue).</p>
	<p>Stormwater drainage</p> <p>The proposed Stormwater Management Plan has not included the minimum relevant information. The following is required:</p> <ul style="list-style-type: none"> ▪ The proposal for drainage of the site shall include drainage of internal part of laneway that will not be dedicated to Council. ▪ The proposed stormwater concept plans shall indicate levels at the OSD orifice, control pit (upstream and 	<p>Noted - detail subject to the design competition and to be documented as part of the detailed SSDA</p> <p>The OSD tank as shown in the civil report gives the spatial requirements for the OSD tank for the purposes of the design competition.</p> <p>The details of the tank including the outlet arrangements will be coordinated with the winning scheme following the design competition and will be documented as part of the detailed SSDA.</p>

Item	Issue	Response
	<p>downstream) and at connection to a new kerb inlet pit (to front the site), to demonstrate gravity discharge. A new pipeline (between new kerb inlet pit and existing Council pit downstream) shall be DN375mm RCP with a minimum of 1% fall.</p> <ul style="list-style-type: none"> Hydraulic modelling shall be provided to demonstrate that the connection of the proposed development to the Council's system will not exceed an increase of 10% flow to the downstream system. Surcharging of the network is not permitted. Control pit shall be located within the property adjacent to the boundary. A nonreturn valve shall be provided immediately prior to discharge to ensure that the public network does not surcharge into the property. 	<p>The OSD tank will discharge to a new stormwater line located in the 3m dedication on the west side of the property.</p>
	<p>Site contamination and remediation</p> <p>The Framework Remediation Action Plan (RAP) does not address the future land dedication areas of the 2.4m footpath widening and 3m future laneways to the boundary areas. The requirement will be that land to be dedicated to the City of Sydney must not be encumbered by an Environmental Management Plan or Long Term Environmental Management Plan. An updated RAP and Site Audit Statement should be provided clearly separating out the land to be dedicated to be remediated to an extent to not require a LTEMP.</p>	<p>The requirement to update the RAP and Site Audit Statement to exclude the footpath and laneways from the LTEMP will likely require further sampling and assessment of the Site in the areas of the footpath and laneways (the front (north west), side (south west) and rear (south east) of the building). This can be undertaken during future site remediation works. Sampling is required to understand if the material is above the Commercial/Industrial criteria and if so what waste classification to expect and if immobilisation is required.</p> <p>It is anticipated that a suitable condition of consent can be included within the Concept SSDA and VPA requiring all land to be dedicated to be suitably remediated so as not to be encumbered by an Environmental Management Plan or Long Term Environmental Management Plan (LTEMP).</p>

Item	Issue	Response
6. Transport and access	Parking quantity The City supports the proposed quantity of parking, noting that this total is to include staff parking, visitor parking and patient transport (ambulance) parking.	Noted.
	Parking layout Servicing vehicles accessing the loading dock must cross in front of the pedestrian entrance from the carpark. This conflict could make the entry point dangerous and unpleasant for staff, patients and visitors arriving via car. In addition, the swept paths provided in Appendix D of the Traffic Assessment show that larger vehicles accessing the loading dock will impinge on the waiting space and ambulance zone. Given the constrained ground plane, this arrangement may be unavoidable, but options such as scheduling servicing and waste collection for outside of core hours should be considered.	Noted - detail subject to the design competition and to be documented as part of the detailed SSDA The reference design basement and ground floor plans are indicative only. The detailed design of these areas, as well as the scheduled servicing and waste collection management will be documented in detail as part of the detailed SSDA.
	Bike parking and end of trip facilities <ul style="list-style-type: none"> Additional bike parking for employees should be provided approximately 20-25 total. These are to be of Class 2 (secure room or cage). End of trip facilities are to be increased accordingly. The 38 visitor spaces are supported. These are to be provided in the form of Class 3 U rails in an accessible ongrade location near a major public entrance to the development and is to be signposted. Exact location is to be confirmed as design progresses. Staff and visitor bike parking are not to be combined. 	Noted - detail subject to the design competition and to be documented as part of the detailed SSDA The design brief will encourage competitors to maximise provision of bicycle spaces in accordance with CoS provisions. The exact number of bicycle parking will be further explored during the design competition and Stage 2 detailed SSDA phase.

Item	Issue	Response																								
	<p>Electric vehicle facilities</p> <p>In this development, the City recommends 50% of parking spaces for employees to be EV ready, that is, capable of supporting electric vehicle chargers. 15-25% of visitor parking should be fitted with Level 2 chargers or higher.</p>	<p>Noted – this will be included in the design competition brief.</p>																								
	<p>Traffic assessment</p> <p>The road layout assumed as the future scenario is incorrect there is no commitment or funding to upgrade the Wyndham Street/ Bourke Road/ Bourke Street / Botany Road intersections to a 'H' shape as pictured in Section 3.6 of the Transport Assessment.</p> <p>The traffic assessment using SIDRA appears to only assess the existing conditions and only looks at the intersection of Wyndham Street and Bourke Road. The point of a SIDRA assessment is to determine the impact of the development on the road network, so assessing the only existing situation is trivial. Also, considering the complexity and proximity of the Wyndham Street / Bourke Road / Bourke Street / Botany Road intersections, assessing only part of this would miss the interactions and queuing effects.</p> <p>The traffic assessment should consider only committed changes to be part of the future road network. The SIDRA traffic assessment should be revised to include at least the Wyndham Street / Bourke Road / Bourke Street / Botany Road intersections (networked to capture queueing), as well as Bowden / Bourke Streets. The future case should be assessed as well.</p>	<p>TTPA have assessed the traffic generation of the proposal. The anticipated traffic generation is 50 vehicle trips per hour (vtp) in the morning and 58 vtp in the evening.</p> <p>It is estimated that the current vehicle generation from the tyre and wheel business is 30 vtp. Therefore, an additional generation of 20 vtp in the AM and 28 vtp in the PM is expected.</p> <p>It is assessed that the directional distribution will be 40% to/from the south on Bourke Road and 60% to/from the north. Accordingly the additional vehicle movements to/from the north will be:</p> <table><tr><th colspan="2">AM</th><th colspan="2">PM</th></tr><tr><td>IN</td><td>OUT</td><td>IN</td><td>OUT</td></tr><tr><td>9</td><td>3</td><td>7</td><td>10</td></tr></table> <p>Of the vehicles egressing to the north 50% will use the left turn slip lane to Wyndham Street so the additional vehicle trips through Wyndham Street and Botany Road intersections would be:</p> <table><tr><th colspan="2">AM</th><th colspan="2">PM</th></tr><tr><td>IN</td><td>OUT</td><td>IN</td><td>OUT</td></tr><tr><td>9</td><td>2</td><td>7</td><td>5</td></tr></table> <p>These traffic signals operate with some 25 cycles per hour so the additional vehicles will represent 1 vtp every 2.5 cycles and such a miniscule number (even if it were 10 vtp per cycle) would not</p>	AM		PM		IN	OUT	IN	OUT	9	3	7	10	AM		PM		IN	OUT	IN	OUT	9	2	7	5
AM		PM																								
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AM		PM																								
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Item	Issue	Response
		<p>have any perceptible impact on the level of service or queueing at these intersections.</p> <p>Given the above, it is submitted that additional modelling of the proposed operations of Wyndham Street / Bourke Road / Bourke Street / Botany Road intersections is not required.</p> <p>City of Sydney Council confirmed via email on 11 October 2022 that Council's Transport Planner reviewed the assessment and supported the Proponent's logic. Council confirmed that the traffic impacts are minor enough that they will not create unreasonable impacts to the surrounding intersections.</p>
	<p>Indicative CTMP</p> <p>The Indicative Construction Traffic Management Plan (CTMP) is meant to outline the matters to be addressed within the CTMP to be prepared in accordance with the approved development. The CTMP should follow the format specified by the City, and should include:</p> <ul style="list-style-type: none"> ▪ Management of construction vehicles, including description of truck routes, specification of largest vehicle to be used, swept paths, works zones ▪ Impact of the project on residents, businesses, pedestrians, cyclists, local traffic and emergency services and management of staff parking ▪ Acceptance of the Standard Requirements for City CTMPs <p>Note that the approval of Works Zones is a separate process that requires Traffic Committee Endorsement.</p>	<p>Noted - detail to be documented as part of the detailed SSDA</p> <p>A detailed Construction Traffic Management Plan will be prepared and submitted with the detailed SSDA.</p>

Item	Issue	Response
7. Tree management	<p>A total of 3 street trees have been identified outside the subject site. The proposal includes removal of 1 street tree (tree 1) located on the western boundary. The remaining 2 trees can be retained and protected during development.</p> <p>Advanced trees are to be planted in a minimum container size of 100 litres at the time of planting. All newly planted trees should also be grown to Australian Standard 2303:2015 'Tree stock for landscape use'.</p>	<p>Noted and accepted – will be included as a requirement in the design competition brief.</p>
8. Contamination	<p>The Detailed Environmental Site Investigation (DESI) concludes that the site is not suitable for ongoing commercial/ industrial land use due to the significant lead contamination. The DESI must be amended to address all gaps that are outlined in the Interim Audit Advice 01, by NSW EPA Site Auditor Rod Harwood, dated 8 June 2022.</p> <p>The amended DESI and a bespoke Remediation Action Plan must be prepared and be peer reviewed by a NSW EPA Accredited Site Auditor and include a section B Site Audit Statement or a letter of Interim advice from the Site Auditor certifying that the RAP is practical and the site will be suitable after remediation for the proposed use. A copy of the revised DESI, RAP and Interim Audit Advice must be provided to Council.</p>	<p>The high levels of contamination were restricted to the fill material where it was detected, which will reduce the volumes of soil required to be removed. This will be confirmed with further sampling during remediation works.</p> <p>An updated Interim Audit Advice (dated 24 June 2022) is provided at Appendix F. In the latest Interim Audit Advice, the Remediation Action Plan (V3) has been approved by the Auditor.</p>
9. Public art	<p>The Preliminary Strategy should be amended to include a budget and to include the submission of an updated Preliminary Public Art Plan following the competition, a Detailed Public Art Plan and then a final public art report as part of the process outlined.</p> <p>It should also be amended to reference the Green Square Public Art Strategy as part of the context or policy alignment.</p>	<p>The detailed design of the future development will be subject to a design competition. As such, a public art budget cannot be reasonably determined until a full evaluation of artwork options and construction requirements are considered. A budget will be agreed at the detailed SSDA stage prior to the start of the art commissioning process through discussion between the proponent and City of Sydney.</p>

Item	Issue	Response
	The City requests a copy of the amended strategy prior to determination of the Stage 1 SSD.	UAP has included a page on the Green Square Public Art Strategy within the amended Preliminary Public Art Plan (Appendix G).
10. Ecologically sustainable development	<p>Section 6.2.5 of the EIS discusses ESD and lists 5 strategies as mitigation measures. These are vague and use noncommittal language, such as 'consider implementing'. It is not possible to determine the level of environmental impact of the proposal due to the lack of clarity around what initiatives will be implemented.</p> <p>The City requests amended details to include firm commitments to specific ESD initiatives. In addition, the list of potential mitigation measures in the EIS does not include any reference to onsite solar. The ESD Report also does not investigate the potential for onsite solar. This appears to be a major omission. The generation capacity of the available roof space should be assessed and a commitment to providing onsite solar be made.</p>	The ESD Report (Appendix H) has been updated to specify that the project has committed to achieving a 5 Star Certified Green Star Buildings v1 rating. This means the project will achieve a set of minimum expectations to ensure that the buildings meets a basic definition of a green building established by the Green Building Council of Australia (GBCA).
11. Waste management	<p>Waste generation</p> <p>Medical waste should be managed in accordance with the minimum standards provide within relevant NSW government policy directives for Clinical and Related Waste Management for Health Services.</p>	Noted and accepted – will be documented as part of the detailed SSDA.
	<p>Design of waste storage space</p> <p>Architectural plans and the waste management plan do not indicate storage space for separate medical waste collection bins. Amended plans are required that clearly outline these areas.</p>	Noted and accepted – will be included as a requirement in the design competition brief and will be documented as part of the detailed SSDA.

Item	Issue	Response
	<p>Waste movement and access</p> <p>Movement of bins and bulky waste to and from the waste storage area (WSA) or the collection point is to be level, free of steps/stairs, avoid the kerb and does not exceed a grade of 1:14 at any point.</p> <p>Swept paths for collection vehicles are required to be submitted.</p>	<p>Noted and accepted – will be included as a requirement in the design competition brief and will be documented as part of the detailed SSDA.</p>
	<p>Waste collection and servicing</p> <p>Details of the ongoing management of the storage and collection of waste, including responsibility for cleaning, transfer of medical and general waste bins between storage areas and collection points, maintenance of signage and security of storage areas is to be detailed in the waste management plan.</p> <p>Onsite collection should allow the waste collection vehicle to enter and exit in a forward direction.</p>	<p>Noted and accepted – will be documented as part of the detailed SSDA.</p>
	<p>Demolition/ construction</p> <p>A Demolition and Construction Waste and Recycling Management Plan is required to be submitted. The plan is to provide details regarding how waste is to be minimised and estimate the quantities and types of materials to be reused or left over for the removal from site.</p> <p>A site plan is required, showing waste refuse areas, truck access and storage areas away from public access for reusable materials and recyclables during demolition and construction.</p>	<p>Noted and accepted – will be documented as part of the detailed SSDA.</p>

Item	Issue	Response
	<p>Storage</p> <p>The nominated waste and recycling storage areas must be constructed to meet the relevant conditions required by the City of Sydney Guidelines for Waste Management in New Developments 2018.</p>	<p>Noted and accepted – will be documented as part of the detailed SSDA.</p>
12. Design excellence	<p>The Design Excellence Strategy prepared by Urbis, dated 9 June 2022, has been reviewed. Recommended changes shown in markups are attached to this letter. It is requested that the strategy be amended and returned to the City's Design Excellence team for review. The final strategy must be approved with the Concept/ Stage 1 SSD. The following additional comments are made:</p> <p>The Strategy refers to City of Sydney Competitive Design Policy (adopted by Council on 9 December 2013). The applicable policy is Sydney Competitive Design Policy December 2020 (adopted by Council on 14 December 2020).</p>	<p>A revised Design Excellence Strategy has been prepared responding to feedback received from City of Sydney and GANSW and is provided at Appendix I. This has been issued to GANSW and City of Sydney for review.</p>
	<p>The EIS states that the Stage 1 envelope can accommodate the additional 10% floor space. This is to be confirmed.</p> <p>The purpose of the reference design is to demonstrate land use suitability and test the capacity of the proposed envelope to accommodate 10% additional floor space [or] height having regard to compliance with planning controls and environmental impacts. A reference design prepared by NBRIS Architecture has been submitted and includes 10%. The applicant should confirm that the indicative design includes the 10% and reflects a compliant scheme. If modifications are required to address noncompliances that will reduce yield, ensure this is flagged in Concept DA report.</p>	<p>It is confirmed that the concept envelope has been designed to accommodate up to 10% bonus floor space, subject to design excellence. The concept envelope has been designed to accommodate the 10% while maintaining compliance with the City of Sydney LEP and DCP controls.</p>

Item	Issue	Response
	Provision 3.3.2(g) and 3.3.8(1)(h) of the DCP require that a Design Excellence Strategy and Concept DA include target benchmarks for ESD. ESD targets should be included in the Strategy.	The ESD Report (Appendix H) has been updated to specify a 5 star green star rating target for the development.
	The site is flood affected, however no flood planning levels are shown on the reference plans. Information should be sought on flood planning levels (FPLs) for ground level uses and basement entries that would be required in order to comply with the City's Interim Floodplain Management Policy.	Flood planning levels have been included in the design brief in accordance with the City's Interim Flood Management Plan.
13. Voluntary Planning Agreement	An offer to enter into a Planning Agreement has been received by the City. A planning agreement is the City's preferred method of securing new community infrastructure including land dedication, developer's worksinkind and monetary contributions. Therefore, the offer to enter into a planning agreement is welcomed. Discussions will continue between the City and the proponent on this matter.	The project team is currently liasing with the City of Sydney's Planning Agreements team to progress the VPA.

4.3. DEPARTMENT OF PLANNING AND ENVIRONMENT – ENVIRONMENT AND HERITAGE GROUP

Table 3 Response to Department of Planning and Environment – Environment and Heritage Group Submission

Item	Comment	Response
1	<p>Proposed Impacts to Street Trees:</p> <p>In relation to Tree 2 the AIA advises that this tree will be subject to minor pruning works to provide clearance of the proposed building. Noting that submitted plans indicate that the area adjacent to Tree 2 will consist of a Deep Soil Area where new trees will be planted it is unclear as to why Tree 2 needs to be pruned.</p>	<p>The reference to pruning has been deleted from the amended AIA (Appendix J). Pruning requirements can be assessed at the demolition stage if necessary.</p>
	<p>The AIA (Table 7) advises that the new building encroaches on Tree 2 up to 31.5%. It is noted that the encroachments to Tree 2 will be associated with footpath widening, demolition of the existing building, land remediation works and possibly by stormwater management infrastructure and new services as opposed to the footprint of the new building. EHG therefore recommends that the submitted AIA is amended to reflect this.</p>	<p>The encroachment is due to the demolition of the existing building. The AIA has been amended to reflect these comments (Appendix J).</p>
	<p>To help assesses impacts to trees identified for retention, EHG recommends that the proposed SSD is accompanied by a cut and fill plan that considers all aspects of the required development including but not limited to required land remediation and construction works, landscaping and the provision of services.</p>	<p>A cut and fill plan will be prepared for the detailed SSDA, once the basement design is finalised.</p>
	<p>The AIA does not advise if Tree 2 can survive a major encroachment of up to 31.5% as well as an unspecified encroachment to its mapped SRZ. EHG recommends that further clarification is required on this matter.</p>	<p>The revised AIA (Appendix J) includes commentary on the event of major encroachment of tree 2. Place Design Group have recommended a arborist be on site during demolition to quantify the impact of encroachment.</p>

Item	Comment	Response
	<p>The AIA further advises that the AIA needs to be reviewed upon the preparation of stormwater, landscape, revised architectural plans or others. It is however noted that a Stormwater Plan is provided as part of the submitted Civil Engineering Draft SSDA Report and that a Landscape Report has accompanied the SSD. The AIA therefore requires amendment to consider these plans/documents as well as all other impacts associated with the proposed development.</p>	<p>A specific AIA will be prepared and submitted with the detailed SSDA, once the design (architectural, landscape, stormwater and civil) has been finalised.</p>
	<p>The Tree Location Plan in the AIA should be updated to include the indicative location of Tree Protection Fencing and Trunk battens. The Landscape Report prepared by Place Design Group Dated 6 July 2022 indicates that four new trees (<i>Eleocarpus eumundi</i>) will be planted on the development site to mitigate the loss of Tree 1. It is currently unclear as to what offsets will be implemented if Tree 2 does not survive proposed construction works. EHG therefore recommends that further clarification is provided on this matter.</p>	<p>The amended Landscape plans have included the indicative location of tree protection fencing and trunk battens.</p> <p>The amended Landscape package (Appendix E) includes a recommendation to replace if required a mature tree planting of the same species in that same location.</p>
2	<p>Flooding</p> <p>The flood modelling includes existing conditions only. Post development and future conditions must also be modelled. Specifically, the ultimate conditions with the proposed laneway network must be modelled.</p> <p>The SES should be consulted for advice. Without advice from the SES, EHG would not support the proposal for a new hospital in this location.</p> <p>Due to frequent flooding, there may be no access to or egress from the hospital. When considering access to the new building, flooding of surrounding streets must also be considered. Many of the surrounding streets are impassable not only in a 1% AEP flood, but much more frequently. Even from the 5% AEP, Bourke Road at the driveway may be flooded with water too deep for vehicle access.</p> <p>Further detail regarding the duration and frequency of inundation is required and should be provided to the SES for comment.</p>	<p>Enstruct have considered 3 scenarios:</p> <ul style="list-style-type: none"> existing conditions (the site now); proposed conditions – the development of the subject site only; and ultimate conditions – the development of the subject site plus opening of the laneway network. <p>Enstruct's flood studies have shown the proposed conditions are the same as existing conditions.</p> <p>As previously noted, the laneway network will be designed to prevent flood water from O'Riordan Street from entering the laneway network. As a</p>

Item	Comment	Response
	<p>Utility services such as power and water may be unavailable at the same time as lack of access and egress due to flooding. The capacity for hospital patients, staff and visitors to shelter in place for an unknown period warrants further scrutiny. Further detail around back up services may be needed e.g., generators and water storage, including their location (preferably above the PMF).</p> <p>A basement is proposed, and all entry points must be the higher of the PMF flood level and the 1% AEP event plus 500mm freeboard. For all potential flood access points to the underground levels of the development, the level of the entry and relevant flood level must be stated (preferably tabulated to allow ease of comparison), including:</p> <ul style="list-style-type: none"> • doorways including fire stairs • lifts • driveways • air vents, including specification of the minimum permissible level(s) for any such openings on architectural drawings. 	<p>result, no further flood controls will be required at the rear of the site.</p> <p>SES provided a response on 4 October 2022, provided at Appendix L. The response highlighted concerns with the proposed 'shelter in place' strategy.</p> <p>Enstruct has reviewed the SES response and provide the following response:</p> <p><i>We recommend the site is essentially closed down when an extreme rainfall event is forecast. Appointments will be rescheduled in the event of such a forecast. Anyone remaining on site should be evacuated in an orderly manner prior to the forecast flooding. This will lessen any additional demand on access/egress routes. Much of Alexandria is flood affected, and reducing the number of people in the area will reduce the impact on flood evacuation routes.</i></p> <p><i>A shelter in place strategy will be based on specific details of the development for anyone remaining on site during a flood event. Given the current application is for a concept SSDA, the shelter in place strategy will be detailed and addressed as a part of the Stage 2 detailed SSDA. The building floor levels have been set such that it the building will remain flood free, while the surrounding road network may be flood affected and therefore unsafe.</i></p>

Item	Comment	Response
		<p><i>The development cannot solve flooding issues of the precinct to provide flood evacuation routes. The above strategy is the best solution to flood management given the site circumstances.</i></p> <p>The concept envelope has been designed to meet the flooding requirements with respect to basement entries and openings. The flood planning levels have been nominated in the Design Competition Brief. Flood level details will be documented in relation to the winning competition scheme and submitted as part of the detailed SSDA submission.</p>

4.4. SYDNEY WATER

Table 4 Response to Sydney Water Submission

Item	Comment	Response
	<p>Water Servicing</p> <ul style="list-style-type: none"> Potable water servicing should be available via a DN200 CICL watermain (laid in 1941) On Bourke Road. Amplifications, adjustments, and/or minor extensions may be required. <p>Wastewater Servicing</p> <ul style="list-style-type: none"> Wastewater servicing should be available via a DN225 CI wastewater main (laid in 1926) on Bourke Road. Amplifications, adjustments, and/or minor extensions may be required. 	<p>Noted and accepted.</p> <p>A Section 73 application will be prepared when the detailed SSDA is approved.</p>

Item	Comment	Response
	Detailed requirements, including any potential extensions or amplifications, will be provided once the development is referred to Sydney Water for a Section 73 application.	

4.5. FIRE AND RESCUE NSW

Table 5 Response to Fire and Rescue NSW Submission

Comment	Response
<p>FRNSW have a fire station and operations centre in close proximity to your planned construction. Whilst we do not have any notable objections to this proposal, we do wish to raise our concerns with regards to traffic impact, particularly during construction.</p> <p>Please consider our requirement of unconstrained access to our site 24/7, when you are planning your build. FRNSW have “keep clear” road markings and require the ability to turn out onto Bourke Street at all times.</p>	<p>Noted and accepted. These comments will be addressed through the preparation of a Construction Traffic Management Plan during the detailed SSDA.</p>

4.6. AUSGRID

Table 6 Response to Ausgrid Submission

Comment	Response
Ausgrid recommends the Proponent makes a connection application as soon as possible.	Noted and accepted.

4.7. TRANSPORT FOR NSW

Table 7 TfNSW to Ausgrid Submission

Comment	Response
<ul style="list-style-type: none"> ▪ The proposed driveway and off-street parking shall be designed and constructed in accordance with AS2890.1 and AS2890.2. ▪ The proposed dedication of land and associated planning mechanism to facilitate a future laneway along the southern and western sides of the site in line with Council's Draft Development Control Plan shall be addressed to the satisfaction of Council. ▪ A preliminary Construction Traffic and Pedestrian Management Plan should be prepared to demonstrate the proposed management of construction related traffic, which addresses the following: <ul style="list-style-type: none"> – Assessment of cumulative impacts associated with other construction activities (if any). – An assessment of road safety at key intersection and locations subject to heavy vehicle construction traffic movements and high pedestrian activity. – Details of construction program detailing the anticipated construction duration and highlighting significant and milestone stages and events during the construction process. – Details of anticipated peak hour and daily construction vehicle movements to and from the site. – Details of on-site car parking and access arrangements of construction vehicles, construction workers to and from the site, emergency vehicles and service vehicle. 	Noted and accepted. All suggestions can be incorporated as conditions of consent for the detailed SSDAs.

Comment	Response
– Details of temporary cycling and pedestrian access during construction.	
Sydney Trains	
TfNSW (Sydney Trains) has reviewed the proposal and advises that in order to protect rail land, assets, operations, and to ensure a safe and reliable rail service, TfNSW (Sydney Trains) requests the Department consider imposing the conditions as listed in Attachment A.	Noted and accepted. All suggestions can be incorporated as conditions of consent for the detailed SSDA.

4.8. SYDNEY AIRPORT CORPORATION

Sydney Airport Corporation raised no objection to the proposed building height and noted a new application would have to be made if an increased height was proposed.

4.9. PUBLIC SUBMISSIONS

No submissions were received from the public during the exhibition period.

5. UPDATED PROJECT JUSTIFICATION

This Submissions Report has responded to each of the issues raised by the referral authorities regarding the proposed development of 28-32 Bourke Road, Alexandria.

The report is accompanied by:

- Updated Architectural and Landscape Plans.
- Supplementary reports which provide additional clarification and information regarding technical issues.

The report and the supporting documents have been informed by additional consultation and engagement with key stakeholders, including the Department of Planning and Environment and City of Sydney. This section provides an updated justification and evaluation of the project as a whole. Overall, it is considered the updated proposal is acceptable having regard to the relevant biophysical, economic and social considerations.

Strategic Context

The proposal is aligned with the strategic policy objectives as it will provide an essential mental health hospital and medical centre occupied by allied health providers to support the rapid growth in the surrounding precinct.

Statutory Context

This SSDA pathway has been undertaken in accordance with the *State Environmental Planning Policy (Planning Systems) 2021* as the proposed development is classified as SSD.

The proposal complies with all of the relevant provisions under the Sydney LEP 2012 and Southern Enterprise Area review. The proposed development is consistent with the objectives of the B7 Business Park zone.

At the time of formal lodgement of the SSDA, the Southern Enterprise Area Review of the Sydney LEP 2012 was still in draft form. This LEP has now been gazetted (5 October 2022). Therefore, the Clause 4.6 variation request that was submitted with the original SSDA is now no longer required due to the gazettal.

Likely Impacts of the Proposal

The proposed development has been assessed considering the potential environmental, economic and social impacts as outlined below:

- **Natural Environment:** the proposal addresses the principles of ecologically sustainable development (ESD) in accordance with the requirements of the Environmental Planning and Assessment Regulation 2021. Further, a BDAR waiver has been granted by DPE, as it was found not biodiversity occurs on the site.
- **Built Environment:** The proposal will improve the urban realm experience by providing landscaping features, larger setbacks, through site links and places to stay and sit. The improved urban realm will have a high positive impact on local residents and future patients, visitors and staff who use and work within the proposed facility.
- **Social:** The proposed hospital and medical centre will have an overall high positive impact on the local and LGA wide communities, as well as more broadly communities in the Sydney Local Health District and in Sydney.
- **Economic:** the proposal will create 700 jobs in construction and 130 full time jobs in operation. Allied health related jobs will be delivered across the balance of the site. The proposal will provide a large investment in infrastructure spending and developer contributions. The proposal will facilitate the orderly and economic development of site in accordance with the relevant planning controls.

The potential impacts can be mitigated, minimised or managed through the measures discussed in detail within Section 6 of the EIS.

Suitability of the Site

The proposal is consistent with the aims and objectives of the Southern Enterprise Area Review in that it will increase the amount of employment floor space in North Alexandria while also facilitating the dedication of land so that development can be supported by a legible network of public streets, lands and open space and retain the distinct fine grain low-scale built form to the north of North Alexandria.

Public Interest

The proposed use of the site as a hospital and medical centre will provide a key piece of community infrastructure will service the broad community. The facility will provide unique services targeted at privately insured patients aged 18 + with mood disorders. Anxiety disorders, and those with comorbid drug and alcohol disorders. The facility will provide both inpatient and outpatient services to suit the specific needs of the patients.

Summary

Having considered all relevant matters, the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

DISCLAIMER

This report is dated 26 October 2022 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Centuria (**Instructing Party**) for the purpose of Submissions Report (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A

SUBMISSIONS REGISTER

APPENDIX B

UPDATED MITIGATION MEASURES

APPENDIX C

DETAILED MAP

APPENDIX D

CONCEPT AND REFERENCE SCHEME

APPENDIX E

LANDSCAPE PLANS

APPENDIX F

INTERIM AUDIT ADVICE

APPENDIX G

PRELIMINARY ART STRATEGY

APPENDIX H

ESD REPORT

APPENDIX I

DESIGN EXCELLENCE STRATEGY

APPENDIX J

ARBORIST REPORT

APPENDIX K

STATUTORY COMPLIANCE TABLE

APPENDIX L

SES RESPONSE

