

3 April 2024

Our Ref: R/2024/1
File No: 2024/208397
Your Ref: SSD 59006709

Megan Fu
Department of Planning and Environment
via Major Projects Portal

Dear Megan,

Alexandria Health Centre Detailed Design – SSD 59006709 - Advice on EIS

Thank you for your correspondence dated 5 March 2024 inviting the City of Sydney Council (the City) to comment on the proposed detailed design for the Alexandria Health Centre.

SSD 59006709 seeks consent for the construction of a 7 storey mental health hospital and medical centre, with 77 car parking spaces, site works including a new laneway, public domain works and landscaping.

The City notes the project has undertaken a competitive design process previously with the preferred design from architects Warren and Mahoney + MAAP being selected as the winner.

The City is not objecting to the project.

The City has reviewed the submitted EIS and supporting documentation and provides the following comments for your consideration.

1. Urban Design

The City's previous advice relating to the street frontage height of the approved concept envelope remains relevant.

The proposed detailed design, whilst 4 storeys to Bourke Road, is setback at least 6.3m at ground and mezzanine level, then setback nil-13.4m at levels 1-3, which does not fully utilise the approved concept building envelope.

The absence of providing the 4 storey street wall on Bourke Road risks the building not adequately relating to the adjacent future development along Bourke Road. The street wall plays an important role in defining the spatial structure of a place. It defines the 'space' of the street, provides visual cut off from the street to the taller building behind the setback, creates a consistent built form along the street by linking one building to another and minimises 'perceived' density by creating a continuous wall along the street with appropriate articulation.

The Design Jury recommended the open space public realm to Bourke Road being retained in order to compensate for breaking away from the street wall. Given that the landscaped area provides inadequate deep soil (see additional comments below), there is insufficient justification for deviating from the SDCP.

It is noted that there are many mezzanines and voids proposed. These areas are not to be filled in and turned into gross floor area in future as these spaces are vital to provide spatial interest and are integral to the design. The central courtyards should also be maintained as they importantly provide natural light and amenity to the surrounding internal spaces. In this regard, it is recommended that the opportunity for the spaces adjoining the central courtyards to receive natural ventilation be explored to optimise biophilic design.

It is also recommended that:

- The eastern elevation is to be further articulated to provide visual interest, noting the proposed setback and redevelopment of 26 Bourke Road, Alexandria as part of D/2023/691 which is currently under assessment by the City. As per the Design Jury comments, consideration is to be given to artwork in this location.
- All external materials must be fully described and keyed on elevations, sections and the material and finishes schedule. The details must include specific product information where relevant, including manufacturer's detail, material type, finish and colour. There should be no reference to 'similar to'.

2. Landscaping

Deep soil

Unimpeded deep soil to the site that meets a minimum 10% of the site area should be implemented, in accordance with Section 5.8.3.6.1(1)(b) of the SDCP 2012.

The proposal provides 3% deep soil; however, no portion achieves a minimum 3m dimension in any direction. The design relies upon an engineered stormwater design that fragments deep soil zones. The deep soil is impeded by retaining walls and associated footings, concrete ramped path, stairs, sandstone paving, grated drains and seating areas at ground level. Further, levels 1 to 4 of the development overhang the deep soil zone in the front landscape setback.

There are also inconsistencies between the landscape and civil drawings. For example, the landscape design indicates a timber decked ramp, while civil plans show concrete ramp.

Without amendment to pull the building back clear of deep soil, rationalisation of walls, footings, structures and pavement materials, the proposed deep soil will not support canopy trees to maturity and is significantly impacted by structures that will limit on site stormwater infiltration.

Green roof

The City maintains that the proposal must provide an inaccessible and extensive green roof to a minimum 30% of the available rooftop space, as required by Section 5.8.3.6.2 of the SDCP 2012 Southern Enterprise Area.

Planting on structure

The success of landscape on slab requires great design, coordinated services, soil depth and soil volume, drainage, watering systems and ongoing maintenance.

A reliance on planters with excessive mounding up to 600mm is not supported. The planter design does not achieve 1m depth required to support trees. Structural slabs must make allowance for the wet soil loads proposed and mounding up to maximum 200mm is acceptable at installation.

It is also noted that landscape plans p39-42 are coloured diagrammatic plans that indicate the location of features only. The plans do not adequately demonstrate the design, levels, planting, access and maintenance.

It is recommended that:

- A review be undertaken of the design of all planters, to ensure landscape areas on structure achieve the minimum soil depths and soil volumes in accordance with the City of Sydney Landscape Code Volume 2;
- Updated plans be provided with levels (SSL, RL, TW), typical planter details, with confirmation of soil volume for all new trees and confirmation of tree species on upper levels;
- The landscape maintenance strategy be outlined with confirmation of how inaccessible planters and planters beyond the mesh barrier screen are accessed for ongoing landscape maintenance.

Contamination

The subject site is contaminated land due to historic uses. The Remedial Action Plan (RAP) does not address how deep soil zones will be remediated to provide a marker layer and min 1m virgin excavated natural material for tree planting. The RAP must be updated to demonstrate how deep soil outside of the basement is made safe for the intended use.

3. Public Domain / Flooding / Stormwater

Flood Impact Assessment

The subject site is identified as flood affected. The Flood Impact Assessment considers City's Alexandra Canal flood model 2020 by WMAwater.

It is recommended that the latest version of Alexandra Canal flood model 2023 be obtained from the City to undertake a revised site-specific flood impact and risk assessment.

The Flood Impact Assessment considers ultimate scenario of development of laneways all around the site and its connectivity to the Ashmore connector and O'Riordan Street. It is recommended that site-specific flood study and flood impact and risk assessment be updated to include proposed laneways associated with the current development as development of future laneways surrounding the site is subject to redevelopment of other properties.

The Flood Impact Assessment shall address impacts of proposed development surrounding laneways based on changes in flood levels, duration of flooding, rate of rise of flood waters, depth and velocity, flood warning and evacuation time, frequency of

inundation, flood function categorisation and flood hazards for full range of events up to and including PMF

The site specific flood impact and risk assessment is to be prepared in accordance with NSW Government Flood Prone Lands Policy and NSW Flood Risk Management Manual 2023 & accompanying toolkit including LU01 Flood Impact and Risk Assessment guideline. It shall address impacts of proposed development based on changes in flood levels, duration of flooding, rate of rise of flood waters, depth & velocity, flood warning and evacuation time, frequency of inundation, flood function categorisation and flood hazards for full range of events up to and including PMF.

Flood Emergency Response Management Plan

The flood emergency response management plan should be updated to incorporate comments by SES and principles outlined in the support of SES's Emergency Management Planning Guidelines. The flood emergency response management plan, once satisfactory, shall be placed on the property title to ensure that the information is effectively transmitted to users and is reviewed and updated, as necessary.

On-site detention

The Civil Design plans depict proposed OSD being located within the temporary lane, with access interfering with the driveway for basement and ground-level carpark. It is recommended that the access pits be relocated away from the driveway, and wholly within the new property boundaries.

Stormwater

The storm water plans submitted require amendments to show drainage long sections with a Hydraulic Grade line that meets the 5% ARI event (1 in 20 year). Flood levels shall also be shown in all cross sections and long sections, especially at the Vehicular Crossing and Substation.

Additionally, the proposal shows stormwater drainage pits (KIPs) and pipes along the eastern end of the laneway which in future will possibly be in the middle of the laneway in the ultimate development scenario. The design should consider the ultimate development scenario, how stormwater drainage in the laneway will change and how drainage in the laneway connecting O'Riordan Street and Ashmore Connector will be managed as a result, including any capacity issues downstream.

4. Western laneway design / Voluntary Planning Agreement (VPA)

The City has been working with the applicant on the preparation of a draft Voluntary Planning Agreement for the site. The City has proposed that the draft VPA secure the 'future' dedication of land for both laneways once the City has obtained sufficient adjoining land to deliver the new laneways. In the meantime, the applicant is proposing for the land to operate as a driveway.

Neither the EIS nor the accompanying documentation specify the temporary nature of the additional 3m driveway being provided within the site. Notwithstanding, the construction of the additional 3m temporary driveway to the western boundary is acceptable, noting its removal and future treatment (once the DCP laneway is constructed) is yet to be resolved.

The City is in the early stages of preparing a Masterplan for North Alexandria, where future roads, laneways and shared zones, as well as traffic direction will be further

developed. In light of this, the City will continue to engage in discussions with the applicant on this matter.

The draft VPA also seeks to secure the land and works for footpath widening on Bourke Road and a monetary contribution for community infrastructure, which is linked to bonus FSR. For this reason, the City recommends that the VPA be agreed and exhibited with this detailed design SSD. If the VPA is not executed at the time of determination, the detailed design SSD is to be a deferred commencement consent, subject to the execution and registration of the VPA on title.

5. Transport and Access

Western laneway and vehicle access arrangements

It is recommended that:

- The vehicle swept path analysis for the largest size vehicle (service vehicle and ambulance) be prepared, noting that the traffic impact report states that provision has been made for the accommodation of Council's 9.25m waste vehicle, however the swept path analysis is for a 6.4m long SRV.
- A loading and service management plan is to be prepared, including a schedule or register that is maintained to manage the safe and efficient use of the loading dock. The plan is to ensure there is no service vehicle movement during the peak use of the site.
- The driveway will require the long section to be edited to show a swept path diagram of the design vehicle used in this application.

Car parking design

It is recommended that:

- Clarification be provided if the 4x accessible car parking spaces will be allocated to staff.
- The mezzanine and basement level car park levels be provided with a turning bay/blind aisle.
- The door opening zone for accessible car spaces be located away from vehicle traffic.
- Where a car park is accessed by a security gate, that gate must be located at least 6 metres within the site from the street property boundary.
- Options should be explored to mitigate conflicts between pedestrians entering the car park and servicing vehicles accessing the loading dock. Management strategies may be considered, scheduling servicing activities outside of peak hours of operation.
- With 70 car parking spaces designated for hospital staff and the medical centre, assuming a conservative estimate of 50% traffic movements during peak hours, approximately 35 vehicle movements per hour are anticipated. Consequently, the driveway access should be designed to accommodate simultaneous operation by two vehicles—one entering and one exiting side by side. A vehicle swept path analysis must be prepared to demonstrate the feasibility of two-way movements within the driveway access and ramp.

6. Contamination

The Detailed Site Investigation and Remedial Action Plan state that the site can be made suitable after remediation for the purpose for which the development is proposed.

It is noted, as per the Landscape comments, that the RAP will need to address how deep soil zones will be remediated.

The RAP has not been peer reviewed by a NSW EPA Accredited Site Auditor and does not include a Section B Site Audit Statement or letter of interim advice issued by that auditor certifying that the RAP is practical and the site will be suitable after remediation for the proposed use.

It is recommended that a section B Site Audit Statement or letter of Interim advice be obtained from a NSW EPA Accredited Site Auditor, certifying that the updated RAP is practical, and the site will be suitable after being remediated in accordance with the requirements of the RAP.

The Section B Site Audit Statement / Letter of Interim Advice is required prior to determination.

7. Tree Management

Proposed Planting and Canopy Cover Targets

Three trees are proposed to be planted within the front landscape setback area. This will only provide 1.6% canopy cover for the site when at least 15% canopy coverage is required. Whilst it is acknowledged that the City's canopy coverage requirement is a DCP control, the target is also outlined in the Greening Sydney Strategy and Urban Forest Strategy.

It is recommended that the proposal provide at least 15% canopy coverage in the site within 10 years of completing the development. Adequate spacing must be taken into consideration to ensure the successful establishment and growth of new trees.

In addition:

- The [City's Tree Species List](#) contains additional information regarding species suitability for trees within the site. Trees are to be planted in a minimum container size of 200 litres at the time of planting. All newly planted trees should also be grown to Australian Standard 2303:2015 'Tree stock for landscape use'.
- A minimum of 70% canopy cover is required for the new laneway and any newly designed streets. All trees must be planted in accordance with the City's Street Tree Master Plan. New street trees shall be a minimum container size of 200 litres at the time of planting.

Remediation Action Plan

There is a potential for contamination to be encountered in the street tree root zones encroaching into the site. Advice is to be sought from the Project Arborist and Environmental Consultant regarding the extent of excavation that may be undertaken while ensuring the health of the trees.

8. Waste Management

The amount of waste generated from the site cannot be undervalued. The health sector in NSW produces approximately 8% of the waste of the NSW economy. Therefore new development must be built to be future proofed and ensure that there is adequate space for both mandatory, proposed and potential future resource recovery waste streams.

The proposed waste storage area at ground floor is undersized and does not include a bulky waste storage area. This is particularly relevant given the tight loading space, and as additional medical waste bins that will need to be presented have not been factored in, nor has the waste of future tenancies.

Additional information is required as follows:

Waste generation

- Medical waste should be managed in accordance with the minimum standards provide for in the NSW government policy directive for Clinical and Related Waste Management for Health Services and all relevant legislation pertaining to the management of clinical and related waste.
- As a facility with bulky equipment, additional space must be allocated for bulky waste as a minimum of 8m² is required. This is to be detailed in the architectural plans.

Design of waste storage space

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:

- the location and space of the designated medical waste storage area/s,
- the number of bins required; correctly scaled, distinguishing between sizes (eg 240L, 660L, 1100L)
- the proposed layout of bins within storage areas
- the proposed frequency of collection

Additional design considerations should be shown on the plans in relation to:

- ensuring adequate door width for the size of the bins
- back of house requirements for the location and storage of additional waste storage and waste
- handling equipment to be used, e.g. compactors, balers, tugs/trolleys, and any other equipment that are likely to be used.

A bin for each waste stream (waste, recycling and food waste) is to be centrally located on each floor (clearly mark on the plans). Details on the changeover/servicing and maintenance of these bins is to be outlined within the waste management plan.

Waste movement and access

- 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 not exceed a grade of 1:14 at any point.

Storage

- 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.
- Commercial waste and recycling receptacles and any bulky waste must be stored on the property at all times and must not be placed on kerbside for collection.

Waste and recycling collection

- Commercial tenancies must have a commercial waste contract(s) in place prior to commencement of trading.

9. Public Art

The City supports the locations for public art which are all in the landscaped area at the front entrance to the building and includes the landscaped area, the soffit and fixed seating elements.

The Public Art Plan by UAP, dated November 2023, notes that the proposed budget for public art at the Alexandria Health Centre is expected to be in the order of \$250,000. This budget is not commensurate to the scale of the development or the opportunity proposed.

It is recommended that the budget be increased to be commensurate with the scale of development and to allow budget for community engagement with members of the local Aboriginal community.

10. Heritage

As a result of the analysis provided in the Heritage Impact Statement, the City has no heritage concerns with the proposal to demolish the existing buildings. Should the proposal be supported, the City would like to recommend draft conditions addressing archival recording, archaeological monitoring, and protection of Aboriginal cultural heritage.

Should you wish to speak with a Council officer about the above, please contact Jessica Symons, Senior Planner, on 9265 9333 or at jsymons@cityofsydney.nsw.gov.au

Yours sincerely,



Graham Jahn AM LFRAIA Hon FPIA
Director
 City Planning | Development | Transport