ATTACHMENT 1

City of Ryde Submission

Ryde Hospital Redevelopment - SSD-36778089
1 Denistone Road Eastwood

Ryde Hospital Redevelopment:

Concept Masterplan and Stage 1 Site Works

Submission Date: 19 September 2022

EXECUTIVE SUMMARY

Thank you for inviting City of Ryde to comment on the proposed redevelopment proposal for Ryde Hospital submitted under SSD-36778089. The State Significant Development Application seeks approval for a Concept Masterplan and Stage 1 Early Site Works for the redevelopment of Ryde Hospital, located at 1 Denistone Road, Eastwood.

The following provides a summary of the proposed works for the Concept Masterplan and Stage 1 Early Site Works:

Concept Masterplan

- Proposal for two (2) new maximum building envelopes detailed below:
  - A clinical services building envelope located in the centre of the site, with a podium height of RL113.70 and a tower height of RL136.50.
  - A multi-deck car park envelope located in the east of the site, with a maximum height of RL116.20 that can accommodate approximately 350 vehicles.
- Proposed maximum GFA of 40,000m^2 for the clinical services building and equivalent 15,000m^2 for the multi-deck car park (if parking spaces counted as GFA).
- The proposed multi-deck car park is expected to provide parking spaces for up to 350 passenger vehicles, resulting in a total site wide parking provision of around 500 off-street car parking spaces.
- Vehicular access to the proposed multi-deck car park and internal loading dock is to be facilitated via the existing driveway connecting with Ryedale Road at the western property boundary to the immediate north of Fifth Avenue. Access movements to and from this driveway is restricted to left in/left out.
- Vehicular access to the remaining parking and servicing areas on site are proposed via five (5) driveways connecting with Denistone Road at the eastern property boundary.
- The existing driveways on Fourth Avenue are to remain unaltered.
- Refurbishment of existing buildings on site.
- Indicative demolition and vegetation removal.
- Increase the total number of hospital beds to 230 beds (+98 beds) by 2026.

Stage 1 Early Site Works

- Demolition of three (3) existing buildings within the north-western portion of the site.
- Install a temporary building to facilitate the decanting and relocation of existing hospital services.
- Site preparation works, including clearing and tree removal.
- Bulk earthworks, shoring work and internal roads.
- Establishment of access points for construction workers and vehicles from Ryedale Road.
- Termination of in-ground building services and augmentation of utilities as required.
- Provision of temporary at-grade parking for hospital staff, visitors and construction workers.

Council officers have undertaken a review of the SSD Application placed on public exhibition and have concerns/ comments with certain aspects of the proposal. These concerns relate to matters including:

- Built form and front setback of the car park building
- Issues regarding car parking and traffic analysis/ report

- Impact of vegetation clearing
- Public domain
- Impact of heritage significance of the site/setting

Details of the above issues are included in the submission and are discussed below. It is recommended that the application be amended to address these issues and additional information be made available for Council to review the matter again before any approval is granted.

Each of the issues are detailed below:

1. **Traffic and Parking**

   This aspect of the proposal has been reviewed by Council's Transport Department. The following issues are raised that require further attention:

   Concept Masterplan:

   a. **Parking demand study**: Stantec's transport and traffic report accompanying the SSD application references a separate parking demand study to inform the future parking requirements for Ryde Hospital as part of its proposed redevelopment. This parking demand study was not included as part of the documents forming the SSD application. In this regard, the appropriateness of the future site-wide parking provision (around 500 spaces) recommended in Stantec's report cannot be fully assessed in the absence of this information. It is therefore requested that the parking demand study referenced in Stantec's report be provided to Council for further review.

   b. **Transport solution inadequate with heavy reliance on private cars/ parking**: Stantec's transport and traffic report indicate that Ryde Hospital currently generates a peak parking demand of 388 vehicles comprising 271 vehicles parked on site and 117 vehicles parked within the surrounding local road network. It is evident that the current capacity of the internal parking areas servicing the hospital is inadequate to service the current peak parking demand generated by the hospital.

      Based on the operational travel data provided in Stantec's report, it is noted that 92% of staff travel to the site by car. It is further noted that Ryde hospital is anticipated to have up to 466 staff on during the site's operational periods by 2031. The proposed development is therefore expected to generate a maximum staff parking demand of 429 vehicles (0.92 x 466). Table 15 of Stantec's report indicates that a total of 325 parking spaces on site should be dedicated to staff, which will mean more than 100 staff vehicles will need to park within the surrounding local roads. It is unclear at this stage how many visitors will be required to rely on public parking facilities within the surrounding local roads.

      In any case, it is evident that the subject proposal is likely to introduce

significant traffic and parking demand within the surrounding local road network, which will:

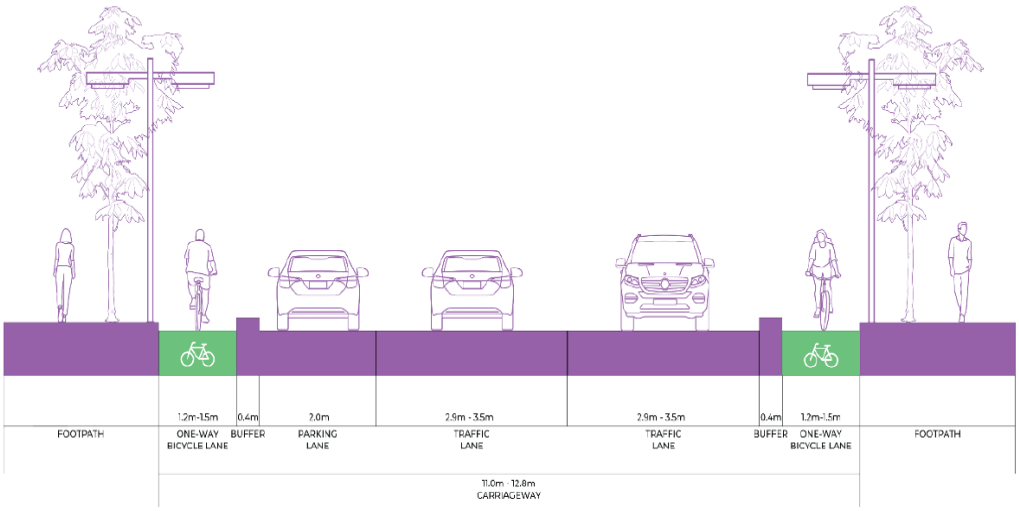
- Reduce public parking opportunities within the surrounding local roads.
- Increase difficulties/pressure in finding parking resulting in additional vehicular trips on the surrounding public roads, which can increase the risk of accidents.
- Adversely impact on the surrounding residential amenity.

The provision of additional on-site parking to address the shortfall in on-site parking is not considered to be a sustainable solution, as it will encourage more people to drive to the site rather than consider alternative forms of transport (e.g. public and active transport).

The applicant is therefore required to consider implementing appropriate active transport improvements/strategies to facilitate a behavioural shift away from private vehicle travel, which will minimise traffic and parking impacts on the surrounding public road network associated with the proposed development. The following public/active transport measures should be implemented at a minimum to mitigate the traffic and parking impacts associated with the proposed development, which are consistent with Council's planning controls and transport strategies (e.g. City of Ryde's 2041 Integrated Transport Strategy, City of Ryde's 2022 – 2030 Bicycle Strategy & Action Plan, etc.):

- Increase the number of bus services operating in the immediate vicinity of the site. This may also necessitate an upgrade to the bus infrastructure and surrounding public roads adjacent to the site to accommodate safe and efficient bus operations.
- A private shuttle bus service should be organised by the applicant to transport staff between major railway stations/bus interchanges (e.g. Eastwood railway station, West Ryde railway station) and the hospital site.
- Provide end of trip facilities (e.g. bicycle parking spaces, etc.) in accordance with Part 9.3 of Council's Development Control Plan.
- Provide dedicated on-road bicycle lanes along Denistone Road and Fourth Avenue adjacent to the eastern and northern frontages of the site in accordance with Figure 10 of City of Ryde's 2022 – 2030 Bicycle Strategy & Action Plan (shown below) to improve the safety and efficiency of cycling trips to the site. An alternative could be the provision of a shared user path on Denistone Road and Fourth Avenue.

  Figure 10 City of Ryde's 2022 – 2030 Bicycle Strategy & Action Plan



- Raised pedestrian (wombat) crossing across the southern approach of Florence Avenue at its junction with Denistone Road.

- Provide and implement a parking management strategy that ensures the future internal car parking areas are effectively utilised by staff and visitors.

The abovementioned measures should be considered by Department of Planning and Environment to impose on the applicant as conditions of consent.

c. Traffic generation underestimated: The additional traffic generation adopted in Stantec's transport and traffic report appears to be underestimated for the following reasons:

- The adjustment factor for the weekday AM peak hour period based on the assumptions in Stantec's report should be 3 (212 surveyed trips/71 trips estimated based on the Guide to Traffic Generating Developments) not 2.9.

- The existing 63 AM and 54 PM peak hour vehicle trips should form part of the total existing surveyed traffic referenced in Table 17 of the report. In this regard, these existing vehicle trips appears to have been subtracted twice from the post development traffic.

- The background growth factor needs to be confirmed by Transport for NSW.

It is therefore advised that the trip generation, trip assignment and traffic modelling be updated to address the above to ensure the traffic impacts associated with the proposed development has been accurately assessed.

d. **Need to relocate driveway:** The Ryedale Road driveway is envisaged to accommodate a greater level of traffic in the future, as it is proposed to provide direct access to the multi-storey car park as part of the subject development. The continuation of the left in/left out access arrangement through the raised central median within Ryedale Road across the driveway without a nearby turnaround facility could encourage illegal driving behaviour such as U-turns along Ryedale Road. It is therefore strongly recommended that the applicant considers either one of the following options:

- Relocate the existing driveway further north from its current location to minimise impact traffic movements at the junction of Ryedale Road and Fifth Avenue; or

- Relocate the driveway to form the fourth leg of the junction of Ryedale Road and Fifth Avenue and upgrade this intersection to be governed under roundabout traffic control.

Stage 1 Detailed Site Works

e. **Need Construction Pedestrian and Traffic Management Plan**. There needs to be detailed construction pedestrian and traffic management plan ('Plan') submitted by the applicant that examines the suitability/appropriateness of the proposed construction vehicle access arrangements, parking provision, construction vehicle routes and construction vehicle manoeuvring (to and from the site and within the surrounding road network). The Plan also needs to detail appropriate traffic and parking management measures to be implemented during construction to ensure traffic safety and efficiency within the surrounding road network is not compromised. This requirement can form a condition of consent.

f. **Following Permits would be required:** The applicant/builder is also required to apply for relevant permits for the following specific road related activities:

i. Road Use Permit - The applicant shall obtain a Road Use Permit where any area of the public road or footpath is to be occupied as construction workspace, other than activities covered by a Road Opening Permit or if a Work Zone Permit is not obtained. The permit does not grant exemption from parking regulations.

ii. Work Zone Permit - The applicant shall obtain a Work Zone Permit where it is proposed to reserve an area of road pavement for the parking of vehicles associated with a construction site. Separate application is required with a Traffic Management Plan for standing of construction vehicles in a trafficable lane.

iii. Road Opening Permit - The applicant shall apply for a road-opening permit and pay the required fee where the applicant is required to dig into or adjust Council Assets (Assets include all facilities within the road reserve). Additional road opening permits and fees are required where there are connections to public utility services (e.g. telephone,

telecommunications, electricity, sewer, water or gas) within the road reserve. No opening of the road or footpath surface shall be carried out without this permit being obtained and a copy kept on the site.

iv. Elevated Tower, Crane or Concrete Pump Permit - The applicant shall obtain an Elevated Tower, Crane or Concrete Pump Permit where any of these items of plant are placed on Council's roads or footpaths. This permit is in addition to either a Road Use Permit or a Work Zone Permit.

v. Crane Airspace Permit - The applicant shall obtain a Crane Over Airspace Permit where a crane on private land is operating in the air space of a Council road or footpath. Approval from Transport for NSW for works on or near State Roads is required prior to lodgement of an application with Council. A separate application for a Work Zone Permit is required for any construction vehicles or plant on the adjoining road or footpath associated with use of the crane.

vi. Hoarding Permit - The applicant shall obtain a Hoarding Permit and pay the required fee where erection of protective hoarding along the street frontage of the property is required. The fee payable is for a minimum period of 6 months and should the period be extended an adjustment of the fee will be made on completion of the works. The site must be fenced to a minimum height of 1.8 metres prior to the commencement of construction and throughout demolition and/or excavation and must comply with WorkCover (New South Wales) requirements.

vii. Skip Bin on Nature Strip - The applicant shall obtain approval and pay the required fee to place a Skip Bin on the nature strip where it is not practical to locate the bin on private property. No permit will be issued to place skips.

2. Stormwater Management Design

Stormwater Management Plan to be submitted and include the following information:

a. The applicant shall prove that the stormwater generated from the proposed development does not adversely affect the flooding condition to neighbouring properties and downstream catchment.

b. Design to be in accordance with Council DCP 2014, 8.2 stormwater management technical manual.

c. On site detention tank must be designed in accordance with Council DCP 2014, 8.2 stormwater management technical manual.

d. Details of the connection to Council pipe/pit/headwall shall be included in the Stormwater Management Plan.

e. Exact position of the Council drainage assets which are being connected to

(including pit/pipe/headwall, etc.) shall be obtained by non-destructive methods.

f. New pipe proposed if any in Council land and Street, including the connection from the boundary pit to the proposed pit shall be STEEL REINFORCED CONCRETE PIPE, class 4, of minimum diameter >= 375mm.

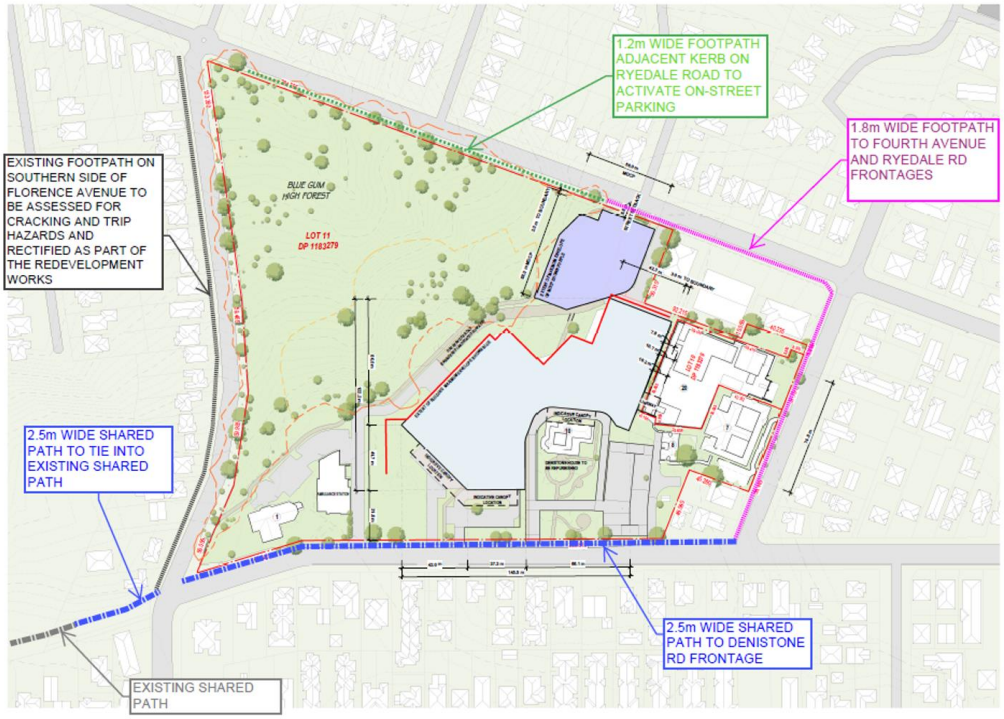
g. Longitudinal Section to be provided and shall be cover compliant as per City of Ryde DCP 2014, 8.2 stormwater management technical manual, table 5.4. Please indicate the cover of the proposed pipe within Council land and Street on the long section, and the type of RCP pipe (steel reinforced Class IV).

h. Existing Council drainage infrastructure details including, diameter, etc. shall be shown on the plan.

3. Public Domain Works

a. General Comments

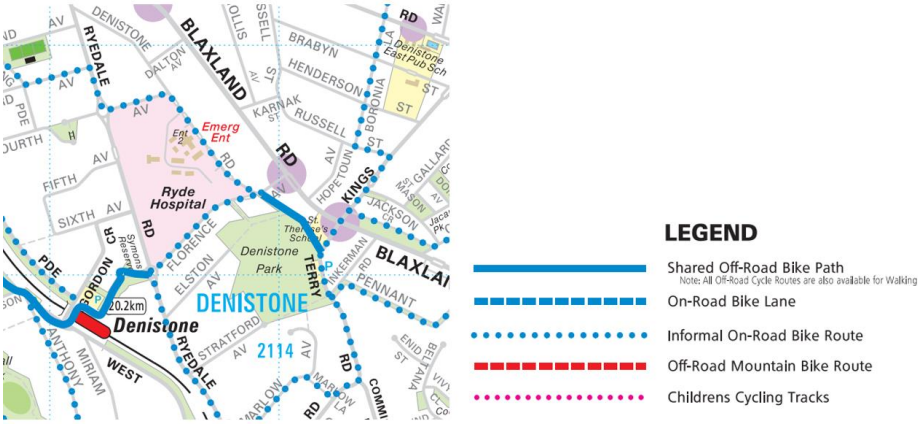
- The site lies outside of the Eastwood Town Centre boundary and therefore the Public Domain Technical Manual and Eastwood Town Centre DCP are not applicable to the Development.
- The development is subject to the standards and requirements of the City of Ryde Development Control Plan DCP 2014 Part 8.3 driveways and Part 8.5 - Public Civil Works, and DCP 2014 Part 8.2 - Stormwater Management.
- Any relocation/adjustment of all public utility services affected by the proposed works shall be clearly indicated in the proposed design. All of the requirements of the Public Authority shall be complied with Utility Services: All telecommunication and utility services are to be adjusted to match the new finished footpath/nature strip levels.
- To improve public safety for the Hospital redevelopment, the street lighting shall be upgraded along Fourth Ave, Denistone Road and Ryedale Road in order to improve pedestrian safety. The existing streetlighting must be brought up to the current Australian Standards. This development will increase the road users patten flow for the area, as such it must comply with AS1158, that is, distributor/collector roads need to be lit to V5/PR2.
- Any bus stop along the frontage of the development site shall be upgraded as part of the public domain improvement works. Any bus stop shall be reinstated / upgraded in accordance with the requirements of the Disability Standards for Accessible Public Transport 2002.



Plan showing footpath upgrade works required for the development frontage.

b. Denistone Road Frontage

i. The Denistone Road frontage of the development contains an in-formal on-road bike route connecting to a formal shared off-road bike path through Denistone Park. The existing bike path line marking on Denistone Road has faded and requires reinstatement in the interim.



ii. The lane widths on Denistone Road are narrow, and due to the proposed intensification of traffic to the site, Council believes that a formal off-road shared path should be provided for the entire length of the Denistone Road development frontage. This will reduce the risk of cyclists incidents on Denistone Road.

iii. The shared user path shall be concrete, 2.5m wide, with a maximum 2.5% grade towards the kerb in Denistone Road. Signage and line marking associated with the shared user path should be provided as part of the public domain works.

iv. Existing street trees may be required to be removed as part of these works. Replacement street tree planting will be required.

v. The kerb and gutter, and road pavement in Denistone Road are in reasonable condition and restoration works are not warranted. Damage as a result of the construction works will be required to be rectified prior to the completion of the works.

vi. The existing bus stop on Denistone Road will be required to be maintained. The existing shelter structure and associated bus stop signage may require upgrade.

vii. All redundant vehicular crossings are to be removed and replaced with new kerb and gutter, and the adjacent road pavement reconstructed accordingly.

viii. The relocation/adjustment of all public utility services affected by the proposed works shall be undertaken as part of the Development works.

c. Fourth Avenue Frontage

i. Fourth Avenue contains large level differences between the footpath and the road, resulting is steep verges. These steep verges are a hazard for pedestrians.

ii. The inundating longitudinal grade of the footpath in Fourth Avenue results in a rollercoaster effect and is non-compliant for accessible travel.

iii. The location of existing gutter bridges at vehicular crossing points poses a hazard for vehicles and pedestrians utilising this area.

iv. The verge in Fourth Avenue is to be lowered to be in line with the kerb line thus providing pedestrian amenity and a compliant accessible travel path. Any retaining walls required to facilitate the lowering of the verge in Fourth Avenue are to be constructed within private property.

v. Existing gutter bridge laybacks and associated vehicular crossings are to be removed and reconstructed to Council's current standard drawings.

vi. The footpath in Fourth Avenue is to be upgraded to 1.8m in width with a maximum crossfall of 2.5% towards the kerb line.

vii. Existing street trees may be required to be removed as part of these

works. Replacement street tree planting will be required.

viii. All redundant vehicular crossings are to be removed and replaced with new kerb and gutter, and the adjacent road pavement reconstructed accordingly.

ix. The relocation/adjustment of all public utility services affected by the proposed works shall be undertaken as part of the Development works.

x. The existing bus stop on Fourth Avenue, near the corner of Ryedale Road, will be required to be maintained. The existing shelter structure and associated bus stop signage will require upgrade.

d. Ryedale Road Frontage

i. The footpath in Ryedale Road, from the corner of Fourth Avenue to the proposed vehicle access into the site, is to be upgraded to 1.8m in width with a maximum crossfall of 2.5% towards the kerb line.

ii. The formalised access location off Ryedale Road to the new multi-storey carpark will result in sight line issues due to the crest in Ryedale Road. Traffic control measures may be required at this access location. Further comment is sought from Council's Transport Department.

iii. To facilitate on-street parking on Ryedale Road, a 1.2m wide footpath, located adjacent the existing kerb, is to be provided on Ryedale Road, from the proposed vehicle access into the site to a location near the roundabout intersection with Florence Avenue, where it deemed appropriate to facilitate a crossing point to the western side of Ryedale Road.

iv. The existing substation on Ryedale Road is to be relocated to be within the confines of the site and not located in public land.

v. Existing trees as part of the Blue Gum High Forest community are to be maintained.

vi. Longitudinal cracking within the road pavement on Ryedale Road is to be monitored as part of the Dilapidation Surveys and restorations provided if pavement failure is amplified as part of the works.

e. Florence Avenue Frontage

i. The existing footpath on the southern side of Florence Avenue is in satisfactory condition and upgrades are not warranted. The existing footpath is to be reviewed for any trip hazards or deterioration and these items rectified as part of the hospital upgrade works.

ii. Longitudinal and transverse cracking within the road pavement on

Florence Avenue is to be monitored as part of the Dilapidation Surveys and restorations provided if pavement failure is amplified as part of the works.

The applicant shall submit concept engineering design plans and specifications, prepared by a suitably qualified and experienced civil engineer, reflecting the public domain upgrade works noted above. All works must demonstrate a smooth connection with the remaining street scape. The required concept plans must be designed in accordance with Council's Specifications and in accordance with City of Ryde DCP 2014 Part 8.3 driveways, Part 8.5 - Public Civil Works, and DCP 2014 Part 8.2 - Stormwater Management.

4. Design Matters

a. Site Access

The proposal provides a total of five vehicular access points (two existing and three proposed) within a distance of 200m on Denistone Road. The frequency of vehicular access to the site seems excessive and will unnecessarily increase the impact on the safety and amenity of the pedestrian environment. Since the staff vehicular access is being relocated to Ryedale Road, there is an opportunity to consolidate and reduce the number of vehicular access points on Denistone Road to the absolute minimum required.

b. Site Configuration

The proposed site layout plan provides extensive areas for at-grade car parking and vehicle circulation that are highly visible from Denistone Road. Whilst Council's urban designer supports the approach of opening up direct views to Denistone House, the proposal cannot be supported in its current form due to the following issues:

- Loss of the opportunity to maintain passive surveillance to the street,
- Adverse visual impact on the heritage-listed Denistone House from within its curtilage,
- Adverse visual impact on the public domain of Denistone Road, and
- Loss of the opportunity to maximise deep soil and canopy tree planting in the front gardens.

The proposal should consider providing a basement car park or ensuring all on-site car parking is encapsulated within the proposed building envelopes. Any at-grade car parking visible from the street should be avoided.

The drop-off area/main building entry is south-facing and is located at the rear of Denistone House. The entry point will have limited direct visibility from the street due to its location and limited solar access due to its orientation. It will result in a poor arrival experience and compromised wayfinding to the main building. The Applicant is advised to reconsider the design of the entry sequence to create legible building entry. For instance, some floor space

may be provided in the form of two-storey buildings to:

- Align with Denistone Road to provide a street address
- Flank the front gardens
- Frame the views to Denistone House

By allocating some floor space to the front of the site, it avoids concentrating the building mass in a single continuous built form and hence reduce the proposal's visual impact and its bulk and scale.

c. Built Form

The significance of the heritage-listed Denistone House is overpowered and dwarfed by the proposed building envelope due to its sheer scale and the continuity of the building mass. Greater building separation and generous landscape planting should be provided between the rear of Denistone House and the proposed building envelope so that Denistone House can be read distinctively from the new works.

The design should also consider distributing building heights and articulating the building mass carefully to avoid creating a 'wall' of development behind Denistone House. The expansive canopy wrapping around the rear of Denistone House at the drop-off area should be deleted to reduce the impact of bulk on the heritage building.

d. Public Domain Interface

As discussed above, the proposal will cause an adverse visual impact on the public domain of Denistone Road due to the extensive at-grade car parking and vehicle circulation area in the street setback zone. The building is also completely disengaged from the public domain as a result of the large street setbacks. The site currently has a number of low-scale buildings fronting Denistone Road, continuously defining the public domain boundary, activating the public domain and providing passive surveillance to the street. These positive design elements will be lost as a result of the redevelopment, leading to an inferior outcome for the local neighbourhood.

As mentioned above under 'Site Configuration', it is recommended that the Applicant reconsiders the site configuration and provides continuous low-scale built form (up to two-storey) along Denistone Road, while creating new visual connections to the heritage items (i.e. Denistone House and the Stables building) from the street. Some of the operational functions may potentially be separated from the main building and accommodated in other locations within the site. By redistributing some floor space to address the street, it helps reduce the bulk and scale of the building envelope, ease wayfinding, enhance the Hospital's street identity and activate the public domain.

If new buildings are not proposed to address the street, the front setback zone should be designed to have a welcoming garden setting with vegetation, seating and gathering spaces to promote social interactions for

patients, workers and visitors. Basement car parking should be provided to replace the at-grade car parking in the current proposal.

e. Visual Impact and building Setback

As shown in View 4 of the Visual Impact Assessment, the proposed multi-deck car park will have a major change to the visual character of the street when viewed from Fifth Avenue, causing the loss of a large area of sky views and a substantial change to the perceived development scale of the local area. It reinforces the argument of requiring an increased street setbacks to the multi-deck car park that is discussed under 'Street Setback' as it will help reduce the visibility of the MDCP. The proposal should be revised to ensure the following is achieved:

- Increase the street setback of the proposed car park building to be more sympathetic to the adjoining buildings and the streetscape, and
- Consider introducing upper-level setbacks to recess higher levels of the MDCP building to further reduce its perceived bulk.
- There is also an opportunity to allow the MDCP building to be sited semi-underground to reduce its visible bulk.

The Visual Impact Assessment report does not provide any wireframe images to show the documented survey points and how the building envelopes are aligned and overlayed in the images. It is advised that wireframe images are provided to the DPE to allow for the verification of accuracy.

f. Sustainability

It is advised that the design of the MDCP building envelope should allow for adaptive reuse of the building structure for other operational purposes when future expansion is required. It will require more generous floor-to-floor heights are provided to each car park level, instead of providing the minimum floor-to-floor heights required for car parking use only.

5. Tree Removal and Planting

It is noted in the EIS that the critically endangered Blue Gum High Forest is to be retained and protected. This is supported and commended.

However, the following issues are being raised that require further attention from the applicant:

a. Tree removal

Under Stage 1 Works, 47 trees are proposed for removed. It is noted that Arboricultural Report states that at least 33 trees need to be removed to facilitate

the Stage 1 works. Tree 45 is listed twice for removal, but there are 33 numbered trees listed. It is not clear whether a tree to be removed has been left off the list.

Only 1 tree marked for removal during stage 1 that belongs to BGHF community (Tree 84, a *Eucalyptus saligna*, 8m tall, with a DBH of 25cm, crown spread of 6m, with moderate retention value).

b. Removal of Undergrowth

It is stated that “removal of lantana undergrowth will be undertaken during the Stage 1 Early Works to support bush management (approved separately under a Part 2 license)”.

It is not clear whether the habitat value of the lantana has been considered and whether the lantana may be preventing erosion of steeply sloping areas.

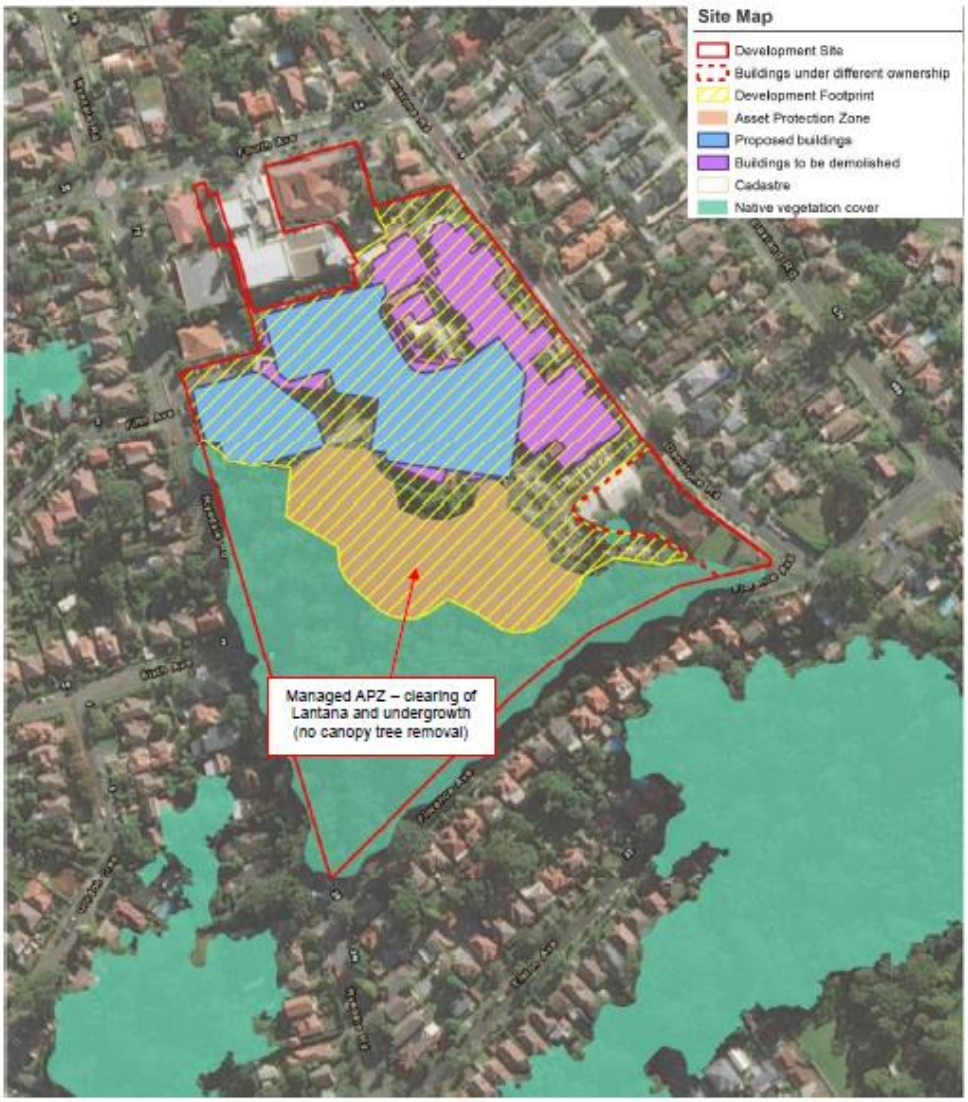


Figure 29 Impacts to Native Vegetation and Extent of Managed Bushfire Asset Protection Zone

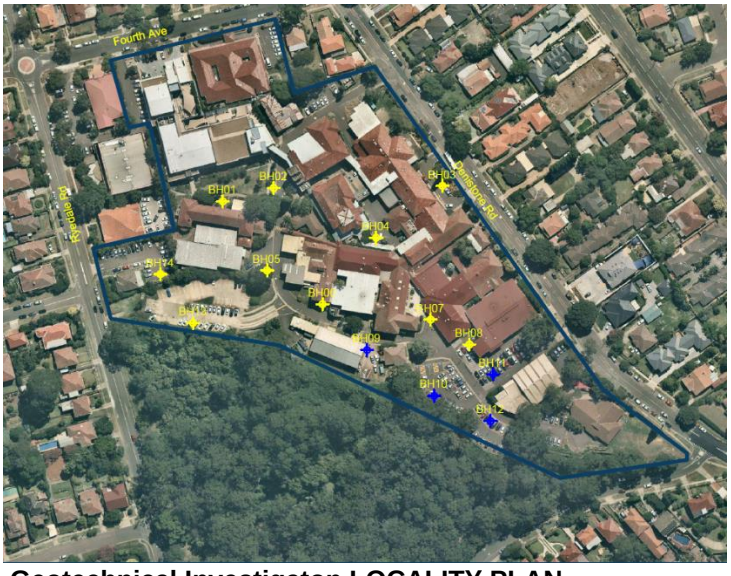
Source: EcoLogical

Parts of the site are very steep, as evidenced by the site context image (showing the contour intervals) and the Analysis of the APZ image in the Bushfire Assessment Report.

The Ryde LEP 2014 identifies much of the slope, and the proposed APZ, as moderate slope instability:

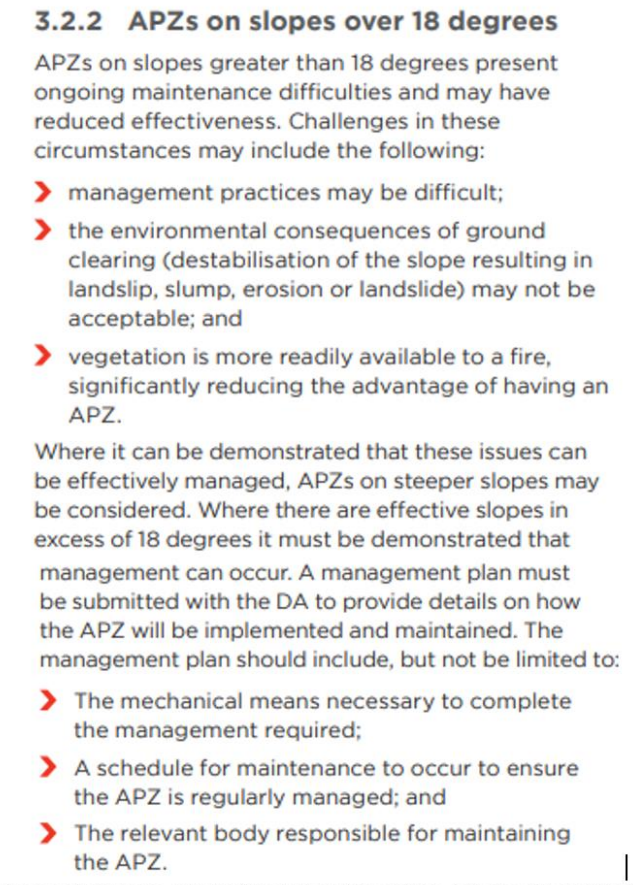
Ryde LEP 2014 slope instability
Darker colour is classed as 'moderate'

It is likely that much of the uppermost part of the slope is relatively unstable fill, associated with the original development of the hospital. It is clear that no part of the slope was included in the Geotechnical assessment. Please see location of the boreholes in the figure below.



Geotechnical Investigaton LOCALITY PLAN,
Figure 1 in the Geotechnical Investigation Report

As stated in section 3.2.2 APZs on slopes over 18 degrees in *Planning For Bushfire Protection 2019*, "the environmental consequences of ground clearing (destabilisation of the slope resulting in slump, erosion or landslide) may not be accetable."



3.2.2 APZs on slopes over 18 degrees

APZs on slopes greater than 18 degrees present ongoing maintenance difficulties and may have reduced effectiveness. Challenges in these circumstances may include the following:

- management practices may be difficult;
- the environmental consequences of ground clearing (destabilisation of the slope resulting in landslip, slump, erosion or landslide) may not be acceptable; and
- vegetation is more readily available to a fire, significantly reducing the advantage of having an APZ.

Where it can be demonstrated that these issues can be effectively managed, APZs on steeper slopes may be considered. Where there are effective slopes in excess of 18 degrees it must be demonstrated that management can occur. A management plan must be submitted with the DA to provide details on how the APZ will be implemented and maintained. The management plan should include, but not be limited to:

- The mechanical means necessary to complete the management required;
- A schedule for maintenance to occur to ensure the APZ is regularly managed; and
- The relevant body responsible for maintaining the APZ.

Excerpt from *Planning For Bushfire Protection 2019*

Much of the slope is around 35º, even up to 45º (See 'APZ and 10kW/m$^{2'}$ figure from the Bushfire Protection Assessment on page 4).

c. Biodiversity Development Assessment Report

The Biodiversity Development Assessment Report states that "…use of a sympathetic APZ design has minimised impacts on that community by retaining tree canopy and some elements of the understorey." There will however be significant impacts on the vegetation that is holding the soil together and reducing the risk of erosion and landslip.

The Vegetation Management Plan must be prepared before the proposed APZ can be approved. This is critical as it will need to be confirmed whether the APZ can be adequately maintained in the long term and what the environmental consequences of the ground clearing will be.

It is disputed that the "poor condition of the vegetation reflects poor habitat opportunity for native fauna and candidate species derived by the BAM C." as thickets of lantana can provide ideal habitat for small birds. In many Blue Gum High Forest reserves in the City of Ryde lantana thickets are the only suitable habitat for a variety of birds such as blue wrens and scrub wrens.

d. Landscape Design Report:

The cross sections provided in the Landscape Design Report and Architectural Plans documents do not reflect the actual steepness of the slope.

None of the shrubs and few of the groundcovers listed in the planting palette belong to Blue Gum High Forest.

e. Recommendation

Further investigation of the slope stability must be undertaken and the vegetation management plan is completed prior

Clearing of lantana is likely to leave no plants in the midstorey or groundlayer due to lantana's allelopathic effects which inhibit the germination of plants nearby. Clearing of the steepest parts of the slope to achieve the proposed 20% groundcover in the APZ could lead to significant erosion and perhaps even landslip. This is of particular concern during a la nina cycle.

6. Heritage Issues

The site is listed as a heritage item on Schedule 5 of Ryde LEP 2014, as having both State and local heritage significance. It includes Denistone House and Trig House. The Stables associated with Denistone House is also on the site.

a. Heritage Item building removal – Trigg House

The heritage assessment and approach to Trigg House and its intended demolition is noted. An archival recording is to be undertaken of the building, and copies should be kept on site with property records and provided to City of Ryde/ Local Studies. Mitigation Measure to be updated.

b. Heritage Item buildings retention – Denistone House and The Stables

These items must be retained.

It is indicated in the plans that Denistone House will be refurbished and the HIS refers to maintenance schedules being prepared in stage 1 for The Stables and future stage or other development applications. While the SSDA is focused on realising the new hospital footprint on the site and improving the interpretation of Denistone House from Denistone Road, the conservation management of these two buildings needs to be integrated into the overall development and management of the site, to ensure the conservation of the two buildings is not overlooked throughout the SDD process or subsequently.

A site visit revealed heritage buildings in poor condition with water penetration and introduced fabric. The significant investment in the site through the SDDA, should also address the conservation management of the two heritage buildings as an outcome of realising the new development.

City of Ryde recommends the following:

- A Heritage Protection Plan be used during each stage of the proposal to protect heritage buildings from potential damage and risks from the new development e.g. foundations, drainage, damage to fabric from falling objects/ proximity of machinery/ vibration, weather proofing.

- Works to the heritage items should be in accordance with heritage terminology as provided in the Burra Charter. 'Refurbishment' is not a term used in the Burra Charter. Health Infrastructure NSW to provided detail on its commitments to heritage conservation works to both building throughout the SDD staged development, that is heritage conservation works alongside the proposal.

- Conservation works in accordance with Section 170 Register requirements and minimum standards of the Heritage Act, NSW Heritage Office requirements, and the Burra Charter (ICOMOS Australia). The HIS indicates there are Conservation Management Plans for the two buildings, they will likely need to be updated as a result of the proposal, particularly in regard to appropriate uses, managing the building, managing the building in proximity to new development (maintenance) and other site usages (pedestrians etc).

- Mitigation Measures to be add to address heritage conservation works in the concept development and at each stage of the proposal.

c. Historical Recording of Site

Council seeks that an historical recording of the site be undertaken to document the overall history of the site, notwithstanding any Heritage Archival Recording of the heritage item buildings e.g. demolition of Trigg House. The proposal will see most evidence of past use of the site removed with the proposal and the uses, layers and storeys must be recorded for historical purposes. Copies to City of Ryde/ Local Studies. Mitigation Measures to be add to address recording the history of the site.

d. Impact of new development on – Denistone House and The Stables

i. Setting of Denistone House - foreground. The main façade of Denistone House presents to Denistone Road. Proposed removal of existing buildings and other structures between the house and the road to re-establish the presentation of the house on-the-street is a positive outcome of the proposal and is good heritage practice. This outcome of the SSDA is supported. However, the following issues require further attention:

    - The landscaping, pedestrian and car parking uses in the foreground of the two heritage buildings are appropriate uses of

this part of the site as they are at grade and support the 'pedestrian scale' of the site, the streetscape and the two heritage buildings. The design of the landscaping, pedestrian access ways and car parking should make use of appropriate materials, fixtures and fittings, colours and layout to support the foreground visual setting of Denistone House. Council's Urban Designer has commented on the design of the foreground and are endorsed from a heritage position.

- Driveway crossing are to be minimised to Denistone Road, and existing crossing must be used. Crossings in the immediate vicinity (viewed from the street, establish an envelope) of Denistone House is not supported and would have an adverse impact on the foreground setting of the house. The site has space towards the Ambulance Station that can be used for site access.

- Pedestrian access is the only form of access that is supported around Denistone House on a regular basis. It is not clear on the architectural plans or in the Heritage Impact Statement what the accessway around the house is, nor the purpose of the canopy.

- The section of the concept built envelope in the foreground Denistone House (Foreground lower platform, south side), has a significant and adverse impact on the setting of Denistone House. The view expressed in the Heritage Impact Statement that the location, scale and bulk of the lower podium in the foreground of Denistone House should be acceptable (because it is modulated to respond to Denistone House), is not supported by Council on heritage grounds. The overall concept built envelop will be a 6-storey/level building of a height of about 39 metres, and the foreground lower podium section, will sit as a large box of a similar height in the foreground of the house. Modulation, as proposed being the step back of built height to create podium will dominate and detract from Denistone House in scale and reinforces the disparity between two architectural styles, undermines the substantial gain in re-instating the foreground setting of the house. The Heritage Impact Statement has not considered other mitigation measures to mitigate the impact of the foreground lower podium section (floor space) and City of Ryde Heritage recommends this should be addressed before determining the SSDA. The foreground lower podium floor space could be relocated elsewhere onsite, there by further supporting the positive outcome achieved in the foreground setting of Denistone House, and the heritage practice of locating new development to the rear and sides of heritage buildings.

ii. <u>Setting of The Stables – foreground.</u> The proposal has focused on the setting of Denistone and there is opportunity to improve the setting of The Stables by the relocation of the substation and gas tanks that sit in

front/ towards Denistone Road as part of the SSD. The relocation of the substation and gas tanks will improve the visual setting of The Stables and its link to Denistone House. A more appropriate location onsite should be found for the substation and gas tanks in Stage 1 of the proposal.

Mitigation Measures to be included d to address the relocation of the substation and gas tanks to further improve the presentation of foreground of the building.

iii. Setting of Denistone House – background. The main façade of Denistone House presents to Denistone Road, and the house sits centrally on the site. The concept built envelope will see a modern large hospital built in close proximity to Denistone House, due to the scale of the development (anticipated health needs) and site limitations (house's centrally located). The Heritage Impact Statement indicates the use of an irregular building form and modulating the envelop (lower scale platforms) responds to and mitigates the impact on Denistone House; and that future stage development applications will further consider building envelopes, façade articulation, modulation and materials for the new hospital building to mitigate impacts on Denistone House. The new hospital will dominate the background of Denistone House due to its size, bulk, height, layout and design. The view of the Heritage Impact Statement that some architectural treatment of the Concept Built Envelope, with a step back façade to higher sections and step back – modulation to lower sections is not supported as the only ways to address the impact on Denistone House. The best location of and the footprint of the Concept Built Envelope has not been evaluated, that is to increase the curtilage around Denistone House and to use other underutilised vacant lands onsite to the south, to maximise the background setting of the house. This appears to be a missed opportunity, given the existing buildings around Denistone House are to be removed. Vacant lands onsite to the south, provides an opportunity to provide an alternative layout/ footprint to the Concept Built Envelope and consider the overall height an bulk of the new hospital.

The proposed lower platform modulation of the Concept Built Envelope to the south of Denistone House will sit alongside the house in side-ground/ background view and will had an adverse impact on the view and setting of the house. Modulation does not reduce the overall bulk, scale and location of lower section, which will be a large box of modern style and materials and a similar, but higher height to the house. The view of Denistone House will be adversely impacted. That section of the lower platform that sits alongside Denistone House is not supported and must be removed or relocated to a non-impact location in the background of the house to improves setting and views and to support the foreground settings improvements.

The proposed higher section of the Concept Built Envelope (main

hospital) is in close proximity to Denistone House and will have an adverse impact on the immediate/ rear view, which should be enjoyed by on site users, as it is now. The curtilage in this part of the site should be increased. The higher section will have an impact on the view and setting of Denistone House, due to its scale, bulk, location, form, materials. It is essential that a range of architectural treatments minimise the visual and setting impact of the higher section on the background setting of the house, and that an alternative footprint is considered (discussed above).

The proposal canopy around Denistone House is not supported and will had a significant adverse impact on the foreground/ background view and setting of Denistone House, as a introduced element of no architectural merit and also raises potential impacts for the management of immediate-curtilage of the house. What is the large canopy for? It has not been justified in the Heritage Impact Statement. The canopy with the lower platform act to enclose Denistone House, detracting from the architecture of the house. The canopy undermines the positive improvements to the foreground setting of the Denistone House and this significant investment. The canopy is not supported on heritage ground and must be removed.
It is noted that the architectural form, colours and materials of the new hospital are to be addressed in future stages of the SDD. It is recommended that Council is consulted so the views of our community are considered.

iv. Reuse of materials and sustainability. The reuse of building materials is now an accepted and essential part of the construction process to improve the industry's performance in sustainable built practice. The reuse of heritage fabric (Trigg House) and non-heritage fabric (other buildings) should be addressed in a deconstruction plan and some reused in new works on the site (possibly landscaping furniture), to provide context to the former historical use of the site. Materials not required, should be provided to a building material recycle outlet, to enable materials to be reused for other buildings works and conservation works.

Overall in terms of heritage impact, it is a challenging to balance the needs of new development and hospital needs on a heritage item site with an important state and local heritage buildings (Ryde LEP). The proposal will provide positive improvements for Denistone House and The Stables in terms of foreground views and setting, but this is alongside the negative impacts of new development in terms of background views and setting, which will be overbearing - new hospital building is a modern architectural design versus the Victorian Regency design of Denistone House.

It is recommended on heritage grounds, that the comments within this heritage commentary are further addressed in the assessment the SSDA.

7. Conclusion

City of Ryde appreciates the need for the expansion of the hospital, however the design has not taken into consideration a number of critical issues that have been raised in this submission.

It is recommended that the application be amended to address these issues and additional information be made available for Council to review the matter again before any approval is granted. At that stage Council will be able to provide suggested conditions of consent.