

Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
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Your Ref	SSD-44034342
Our Ref	NCA/11/2022
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21 June 2023

ATTN: Megan Fu

COUNCIL SUBMISSION

NOTICE OF EXHIBITION OF ENVIRONMENTAL IMPACT STATEMENT FOR THE INTEGRATED MENTAL HEALTH COMPLEX - WESTMEAD HOSPITAL (166-174 HAWKESBURY RD, WESTMEAD)

I refer to the above application and the request to provide advice on the proponent's Environmental Impact Statement. Council has reviewed the supplied report and wish to make the following comments:

Trees and Landscaping

Council's Trees and Landscaping Team are concerned that the design does not demonstrate a response to the special quality of the existing landscape, in particular the existing trees. A total of 100 trees are proposed to be removed. Many of them are mature trees. 30 of these were

The Arboricultural Impact Assessment (AIA) has excluded the removal of 43 individual trees from the assessment which were assessed separately as part of the Demolition Review of Environmental Factors (REF). Many of these trees are mature trees. Tree 10, for example, is a significant Sydney Blue Gum in good condition which has been approved to be removed.

The AIA should be amended to show the impact that this development will have to all trees on that site. A review of this documentation indicates that overall 100 trees will be removed. Council expects that an equal or greater number of replacement trees will be planted as part of this project.

Given this, the following recommendations are made:

1. It is recommended that greater consideration is given to incorporate some of the existing significant trees, in particular trees 10, 40, 49, 50, 52 and 53 are large trees, all are in good condition and are a major feature within the site and locality and are located within or near the Masterplan Green Wedge. Tree 10 is an excellent specimen and is the largest on the site and should be retained. These trees should all be considered for retention and the design modified to accommodate them as an integral part of the Connection to Country aspect of the design.
2. The proposed replacement tree numbers are to be equal to or greater than the number of trees being shown to be removed (minimum 100 replacement trees).

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3. Some of the proposed trees are located too close to the building infrastructure and footpaths. Ensure the location of the new trees are positioned a minimum 3.5m away from any building, 2m away from any drainage line and are at least 1m from the edge of a planter wall or path to avoid the rootball or canopy clashing with the infrastructure.
4. Increase the proposed tree container size increase from 75L to a minimum 100L – 400L advanced tree stock.
5. The Tree Protection Zones (TPZ) be added to all plans for all existing trees to be retained and protected to ensure adequate protection measures and non-destructive construction method for the installation of paths and walls, for example, are considered and identified in these zones.
6. The TPZ and tree numbers are to be shown on all plans (landscape, architectural, civil) for coordination.
7. A Tree Retention and Removal plan be provided showing all of the existing trees to be either retained or removed. Note - only trees within the EOW for this SSDA plus trees within 5m of the EOW to be shown on the plan. Trees away from the EOW zone (for example 26 to 39 (total 14) should be removed from the assessment.
8. The AIA to discuss the full extent of the proposal and include all stages of works (demolition, temporary site access, construction phase, staged works for example) as part of the impact to the trees. It should include reference to the latest (modified) bulk earthworks, stormwater plans, landscape plans and architectural plans.
9. As part of any design modifications, the Project Arborist is to collaborate with the Landscape Architects and Civil Engineers and provide guidance for ways to reduce the impact to the trees to a minor / acceptable level as per AS4970-2009 *Protection of Tree on development Sites* to enable them to be adequately retained and protected as part of the design modifications and throughout the construction works.
10. A Tree Protection Management Plan (TPMP) is created to locate the specific tree protection measures on the plans and discusses the specific guidance around the use of non-destructive construction method to minimise the impact to the tree roots and canopies, for each tree, during all stages of the works (demolition, temporary site access, construction, landscape, staged works for example).

Traffic and Transport

Based on the analysis and information submitted by the applicant, the proposed development is not expected to have a significant traffic impact on the surrounding road network, however, the following additional information should be provided in any response to submissions:

- The Traffic Report does not elaborate how the 349 staff parking spaces or 27 short stay spaces were found to be an acceptable number service the IMHC other than that it was based on a previous study. As such, a peer review on this rate cannot be undertaken. Further details regarding the process used to derive this figure and the assumptions made are to be provided in a response to submissions.
- It is noted that the internal roads are private roads, however, it is highly recommended that the entrances and exits to both the short-stay car park and the loading dock be constructed as a standard driveway with a layback. As per the road rules, pedestrians have priority over vehicles at driveways, therefore, achieving the same intent as the currently proposed zebra crossings. However, having a layback will mean that there will be a vertical deflection which will ensure slower speeds of vehicles when turning in. Furthermore, pedestrians do not need to navigate ramps which makes it easier for those on wheelchairs.
- Details of the proposed zebra crossing have not been provided to allow for a thorough assessment of the proposal, however, given that the crossing will be on a publicly accessible private road, it must comply with the relevant Australian Standards (see AS 1742.10 and AS 1158.4). Given that the crossing will likely be used by staff at night, due to the 24hour nature of the hospital, sufficient lighting must be provided to comply with the specific lighting standards for pedestrian crossings.

Before a pedestrian crossing is installed, a revised traffic assessment must be undertaken to determine the following:

- Whether vertical deflection is required to reduce vehicle speeds
- Whether the location of the crossing allows for sufficient sight lines between motorists and pedestrians to meet Austroads Guide to Road Design requirements for Approach Sight Distances.
- Concerns are raised with regards to the proposed location of the pedestrian refuge island in Redbank Road at Institution Road with regards to sight lines. Accordingly, the Traffic Report is to be revised to undertake a sight lines assessment in accordance with section 3.3 of Austroads Guide to Road Design Part 4A 2017. Similar to the proposed pedestrian crossings, the proposal must ensure that sufficient lighting is provided that meet the Australian Standards for lighting.
- The shared path that extends from Dragonfly Drive and Institute Road into Redbank along the project frontage should be continued
- The crossing points in the red box be raised priority crossings (zebra and green lanes), or another treatment that gives pedestrians and cyclists priority over traffic



Urban Design

Councils City Design team supports the design of the five peninsular wings extending from the base component of the building. These provide improved amenities to the users of IMHC by enhancing the views to the creek and improved solar access.

However, the views of the proposal show that these elements appear to dominate the base component of the building. The proposed height of the peninsular wings also contradicts its foundation principle of increased solar access and the feeling of openness. This is reflected in the solar access drawings that show that each peninsular element overshadows the open space between the wings.

It is recommended that the applicant explore a reduction in the overall height of these wings.

- Reduced height of the peninsular wings will create a more sympathetic relationship with the river and lead to a gradual increase in height from the creek towards Westmead Hospital.
- It will also reduce the overall bulk of the proposal.

- Reduced height of the peninsular wing will lead to better solar access within each open space between the wings, and into the resident rooms.
- It will reinforce the feeling of a courtyard between every peninsular wing due to an improved height to width ratio.

Location of Fire Stairs

The proposal has a strong foundation in Connecting with Country. Fire staircases at the extreme end of each peninsular wing are located at an area that offers the best connection and views to the creek. These staircases offer a tall blank façade to the creek and would only be used by the users of the building in times of emergency. It is recommended that the fire staircases are moved to other suitable locations, utilising the present locations as places that can be used on a daily basis enhancing their connection to the Country.

Facade

- The views of the IMHC showcase that each element of the building has been treated differently in the façade. The base component has linear windows along the street, while the winged elements have repetitive square windows with a protruding metal shading element.
- The façade should adopt a complementary design approach for the base of the building and the upper levels. The proposed façade design is composed off several compartmented vertical elements. A clear separation between the horizontal street level interface and the upper-level extension should be provided and explored further.
- The base of the building should be designed with masonry elements and solid character to address the street and public domain.
- The upper-level elements could be softer to connect to the sky. This will also soften the presentation of the building to the creek.

Catchment Engineer

It is acknowledged that the proposal is substantially flood affected by both riverine flooding (Toongabbie Creek) and overland flow flooding (which is generally higher than riverine flooding). Council staff acknowledge that the application has reasonably addressed the requirements of the NSW Flood Policy and NSW Floodplain Development Manual and also applicable Council LEP and DCP instruments as they now stand, while accepting that a hospital is a 'Sensitive Use' which would not normally be sited in the PMF floodplain. Council does not have any further comment on these documents but requests that the following conditions are imposed on any consent:

1. A condition that binds the development to the ARUP flood study, flood emergency management plan and integrated water management plan which requires general compliance with those documents.
2. *A Construction Environmental Management System and Plan (CEMP) shall be submitted to, and approved by the Secretary prior to work. The CEMP must be prepared in accordance with ISO14001:2015 and the Department of Infrastructure, Planning and Natural Resources (2004) 'Guidelines for the Preparation of Environmental Management Plans' and submitted to the relevant authorities at least 4 weeks prior to the commencement of construction. This plan should cover demolition, soil and water management and site maintenance and any associated groundwater, flooding and overland stormwater flow management. It must address any possible pollution risks, and how they will be managed. It must incorporate updated erosion and sediment control plans/ stormwater plan showing how rainwater and groundwater captured within the site will be treated to satisfactory water quality standards, monitored, and discharged. The plan and management system must be implemented throughout the work.*

Reason: *Environmental protection.*

Conclusion

It is noted that this is the recommendation of Council officers and this submission has not been endorsed at a Council meeting.

Council appreciates the opportunity to comment on the above application, are supportive of the continued investment in health infrastructure in the City of Parramatta and look forward to continued collaboration.

Should you wish to discuss the above matters, please contact Paul Sartor (Senior Development Assessment Officer) on the details listed above.

Yours sincerely

Myfanwy McNally

MANAGER, CITY SIGNIFICANT DEVELOPMENT