

# **ATTACHMENT 1**

## **City of Ryde Submission**

**Ryde Hospital Stage 2 - SSD-58210458  
1 Denistone Road Eastwood**

**Ryde Hospital Redevelopment**

**Submission Date: 13 December 2023  
COR2023/89/1**

## EXECUTIVE SUMMARY

Thank you for inviting City of Ryde to comment on the proposed redevelopment proposal for Ryde Hospital submitted under SSD-58210458. The State Significant Development Application seeks approval for Stage 2 Building Works. The Stage 2 comprises of the following works:

- Demolition of existing buildings.
- Retention of, and conservation works to, the heritage significant Denistone House and Stables buildings.
- Excavation to accommodate basement structure.
- Remediation works to address site contamination.
- Construction of a new hospital building and associated basement structure.
- Construction of part above ground, below ground and at-grade car parking.
- Construction of internal road network.
- Site-wide landscaping including tree planting and a new forecourt in front of Denistone House.
- Upgrades to services and utilities to support the development.
- Retention of the existing Blue Gum High Forest and management of an asset protection zone.
- Tree removal within the grounds of the existing hospital.
- Signage.
- Public domain improvements.

Council officers have undertaken a review of the SSD Application placed on public exhibition and have provided comments in regard to the proposal. These concerns relate to matters including:

Issues:

- Traffic, network performance issues and traffic analysis/ report
- Public Domain Improvements required
- Stormwater Management
- Impact of heritage significance of the site/setting
- Built form and architectural issues
- Access to Open Space
- Impact on Trees and landscaping

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, Parking and Road/ Public Domain Upgrades

This aspect of the proposal has been reviewed by Council's Traffic Services Department. The following comments are offered that require further attention:

### a. Traffic Impact Assessment

- i. **Traffic Counts Data.** The Transport Impact Assessment (TIA) report prepared by Stantec (dated 14 August 2023) in support of the Ryde Hospital Redevelopment (Stage 2) SSD application has used traffic counts data of the roads near the site undertaken on Thursday 24 June 2021 to illustrate existing traffic condition of the road network around the subject site. Additional traffic counts were also conducted on Thursday 23 June 2022 at Blaxland Road/ First Avenue and Blaxland Road/ Ryedale Road intersections and on Tuesday 13 June 2023 at Denistone Road/ Dalton Avenue intersection. It is noted that the traffic count surveys on Thursday 24 June 2021 (around the subject site) were undertaken during COVID 19 restrictions and cannot represent the traffic condition of the road network in 2023 when COVID 19 restrictions have been lifted and traffic conditions almost came back to normal. As such, it is recommended that updated traffic count surveys be conducted and be utilised for establishing the existing traffic condition around the subject site. Alternatively, as a minimum, updated traffic counts for at least three (3) locations is to be provided and compared with the traffic count data on Thursday 24 June 2021 to verify whether the 2021 traffic data is still valid.
- ii. **Parking Shortfall.** Section 4.1.2 of the TIA report provides empirical assessment of car parking demand of the Ryde Hospital Redevelopment (Stage 2). The report indicates that the proposed redevelopment should provide for a total of 449 to 589 parking spaces on site by 2031. The report, then, concludes that the development will provide 482 spaces across the site and the proposed parking supply sits comfortably within the range for parking demand expected in 2031. However, the report did not provide details on how the parking requirement of the proposed development has been calculated. It is also noted that the provision of 482 on-site parking spaces will result in 107 parking shortfall if the parking demand of 589 spaces for the proposed development is reached by 2031. In this regard, the report did not justify how this amount of parking shortfall can be accommodated in such situation. As a result, Council does not support the proposed on-site parking provision.

It is noted that the shortfall of 107 on-site parking by 2031 will impact Council's surrounding assets which needs to be addressed by the applicant by providing an alternative on-site parking. Alternatively, the upgrade of the surrounding Council's footpaths to shared paths and the

provision of pedestrian/cycle links will encourage people to travel to the site by transport modes other than private vehicle and consequently, will reduce the development's on-site parking requirement. Council has previously identified the need for various upgrades required with respect to public domain areas. This issue is discussed further in Council's submission.

- iii. **Target mode shares are Under-estimated.** Section 6.2.1 of the TIA report indicates that a Green Travel Plan (GTP) will be developed and implemented to encourage walking, cycling, public transport and car-pooling for travel to and from work and aims at a shift away from the reliance on single occupant vehicle travel. In this regard, the report developed mode shift targets for the Ryde Hospital by the year 2031 onward (refer to the table below).

Travel Mode	Mode Share Split (%)		
	Existing <sup>[1]</sup>	Year of Opening (2026) Target	Ultimate Target (2031 onwards)
Car, as driver	90%	85%	80%
Car, as passenger	2%	4%	6%
Train	1%	2%	2%
Bus	0.5%	1%	1.5%
Combination of Train and Bus	2%	3%	4%
Walk	3%	3%	4%
Bicycle	0.5%	1%	1.5%
Motorbike	1%	1%	1%

[1] Based on a review of 2016 ABS data and staff survey results, respectively contained in Table 10 and Table 11

However, the proposed target mode share for 2031 onward will only result in minor increase in public and active transport trips (that is, an additional 25 two-way public transport trips, 13 two-way walking trips and five two-way bicycle trips per day as indicated in the TIA report) which is in contradiction with the overall aim of the GTP. It is considered that the proposed target mode shares are under-estimated and the target mode shares for public and active transport are to be increased to result in a meaningful shift away from the reliance on single occupant vehicle travel.

It is noted that based on the 2016 ABS data, 26.9% and 31.4% of people in Denistone and Eastwood travelled by public transport. It is recommended that mode share targets for 2031 onward is to be set based on the 2016 ABS mode share data for Denistone and Eastwood to encourage more people to shift away from private vehicle travel, which is aligned with Council's long term transport strategy.

As a minimum, it is recommended that mode share targets for 2031 onward are set as 6% train, 4% bus and 5% to 8% bicycle with car (as driver) mode share to be no more than 73%. The public and active transport trips as a result of the revised mode share targets must also be calculated based on the maximum number of staff in 2031 (i.e. 676 FTE staff).

#### iv. **Shuttle Bus Service**

Council recommends regular shuttle bus service be provided by Hospital Operator to and from the hospital to the nearest railway stations and adjoining suburbs, given the increase in the number of staff, increase in services and traffic and parking issues outlined in the submission.

- v. **Intersection Upgrade – Mitigation Measure.** Section 7.5 of the TIA report provides road network performance results for the year opening (2026), with and without development, and ten-year design scenario (2036), with and without development. The results of the network performance analysis show that the Blaxland Road/ First Avenue intersection is expected to operate over capacity in the PM peak period following full development of the site, with the south through movement, north right turn and west right turn all operating with degree of saturations between 1.04 and 1.06, average delays of between 130 and 140 seconds and level of service F. Although the report argues that the capacity constraints of this intersection are a result of background traffic growth rather than the addition of traffic because of the redevelopment, the provided figures demonstrate that following full development of the site, the average 95th percentile queue length will be increased from 278m to 300m during PM peak period. As a result, it is recommended that the applicant is required to upgrade the intersection of Blaxland Road/ First Avenue to mitigate the impacts of the proposed development on this intersection.

#### b. **Public Domain and Road Intersection Upgrades**

- i. **Public Domain Upgrades required.** As raised in Council's previous comments on the approved Concept Masterplan, the proponent must deliver the following works to mitigate the traffic impacts associated with the development:
- Convert the existing pedestrian refuge on Florence Avenue at Denistone Road into a raised pedestrian/cyclist crossing.
  - A new shared path on the western side of Denistone Road between Florence Avenue and the new fire access trail through the site. This pedestrian/cycle link through the site shall be open to the general public at all times.
  - A new pedestrian/cycle link between Denistone Road and Ryedale Road through the site.
  - A shared path on the eastern side of Ryedale Road between Fourth Avenue and the new fire access trail.
  - Kerb buildouts and associated linemarking on Dalton Avenue and its intersection with Denistone Road.

The above works, and in particular the shared paths and the pedestrian/cycle links, are in line with the aims of the GTP and will

provide adequate infrastructure to encourage walking and cycling. It is envisaged that the provision of the abovementioned works will result in increasing in active transport trips, which in turn may not only result in lower on-site parking requirement (as mentioned in the second comment), but also may reduce the impacts of the proposed development on the operation of the Blaxland Road/ First Avenue intersection and consequently, may result in not requiring to upgrade the Blaxland Road/ First Avenue intersection.

All public domain work will be required to be provided by the applicant. Given the shortfall in on site car parking, it is essential that the upgrades are provided. Council has previously had meetings with the applicant and the minutes from that meeting have been attached. It is essential to note that Council has minimized the extent of public domain upgrades. This work has not been identified in the Council's future works plans and would have a significant impact on the final position of Council.

- ii. **Median Strip and Speed Limits.** The report also proposed road network mitigation measures including extension of the median along Ryedale Road, installation of intersection priority signage and line marking at the Denistone Road/ Dalton Avenue intersection and 40-kilometre speed zone on Ryedale Road between Fourth Avenue and Florence Avenue. The report also indicates that the extension of the median along Ryedale Road will be delivered by the applicant and the rest of the mitigation measures should be provided by Council. As the works are required as a result of the development. For this reason, the cost of the works should be covered by the applicant.

It is noted that the proposed change of speed limit along Ryedale Road is to be approved by TfNSW. In addition, as discussed in the above comment, it is Council's view that the best treatment for improving safety at the intersection of Denistone Road/ Dalton Avenue is in the form of kerb buildouts and associated linemarking. The applicant is to undertake additional investigation at this intersection and develop an appropriate treatment to the satisfaction of Council. Such treatment is to be delivered by the applicant as part of the proposed development at no cost to Council.

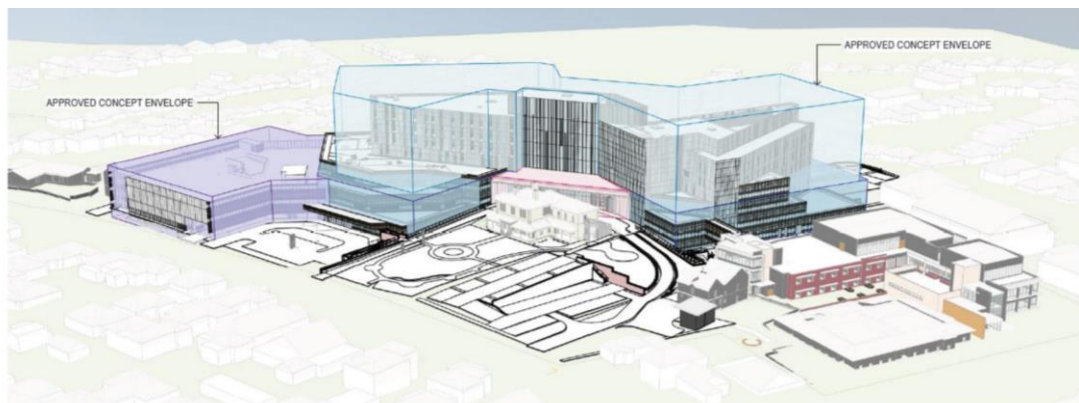
- iii. **Pedestrian/ Cycle Link.** As part of the proposed development, it is proposed to construct a pedestrian/cycle link between Denistone Road and Ryedale Road through the site. However, detailed engineering plans have not been provided to demonstrate whether the proposed pedestrian/cycle link complies with the requirements of the relevant Australian Standards and Austroads guidelines. As a result, the applicant is to be required to submit detailed engineering design plans of the proposed pedestrian/cycle link to Council for review.

## 2. Heritage Issues

The proposal does not demonstrate how several specific requirements of the Concept Approval is being met under the with respect to Stage 2 proposal. These include requirements under the following Conditions:

- a. **Condition C1 – Building Envelope.** The condition requires that future development application(s) must demonstrate that the proposed buildings above ground level are generally not inconsistent with the maximum building envelopes in the architectural plans.

It seems that the new building is not in line with building envelope as approved in the Concept Approval. Page 57 of the EIS states that the podium will exceed the envelope near Denistone House and refers to it as a minor protrusion. However, no details have been provided to demonstrate the extent of this breach and how it may impact on the Denistone House. Details provided in Figure 28 (refer to Figure 1 below) in the EIS does not show any details of height protrusion.



**Figure 1: Approved building Envelope and proposed Height**

The EIA claims the need is for raised structural slab have resulted in the exceeded height of the podium near the Denistone House. There is no evaluation as to why there is no greater impact on heritage building resulting from changed building envelope. In addition, there is no details of heritage consultants input to the design change.

Council requests that:

- Details of the protrusion beyond the building envelope to be provided and evaluated by the heritage consultant and addressed in HIS.
  - Provide clear labels and dimensions on the plans and demonstrate the extent of protrusion and impact emanating from that.
- b. **Condition C6 – Landscaping.** This condition requires all future development application(s) to include a landscape report and plans, prepared by a suitably qualified professional, including the detailed design and treatment of all ground and above ground surface areas on the site and within the adjoining public domain. The landscape plans must be designed having regard to the relevant matters outlined in conditions C3, C4 and C5 of Schedule 2. In this regard the following issues are highlighted:



- i. The Landscape plan and Landscape Design Report do not provide sufficient details about the landscape design and its heritage impact evaluation,
  - ii. Only a few elevations have been included in the landscape plans. A character view is provided on p19 of the Landscape Report, however, there is no front elevation view. It is unclear what the front perimeter plantings and the plantings between the garden and the garden's at-grade car park are. It appears to be trees, however, it is not clear based on the limited details as to how this impact the interpretation and views of Denistone House and the Stables.
  - iii. It seems that two large trees and flag poles are proposed in front of Denistone House. This will obstruct views of the house and defeat the purpose of opening up views of the house in the overall development. New location for any such structures to be identified and ideally adjacent to the podium/ circular driveway around Denistone House and must not be in front of the Eastwood House.
  - iv. Details of row of tree adjacent to at-grade car park near MDCP and the podium supported, but not evaluation of heritage impact and how does this sit with the flagged podium protrusion beyond the building envelope in this part of the podium?
  - v. Plans still show the garden's adjacent to the at-grade carpark dominating the foreground of Denistone House and the Stables with hard surface, which will have an impact on interpreting and the views of the heritage items.
- c. **Condition C8/9 – Design, Articulation/ Materiality.** This condition requires the application to demonstrate how the detailed design, including façade design and articulation, modulation and materiality, as well as site layout and landscaping have been developed having regard to the heritage values and the CMP for the heritage items of the site, to mitigate potential impacts of scale and to provide a sympathetic backdrop to Denistone House.

Condition C9 states a heritage consultant to be involved in the design of the new building to address heritage. It seems that the Heritage Impact Statement (HIS) contains commentary based on a predetermined architectural design (p68 of HIS). It is unclear how the design aspect of new building has addressed heritage values. The design appears to be stock-standard hospital architecture used (current architecture patterns).

Colours and Materials, the 'crazy- panel' approach to the external cladding of the new building will compete with the Denistone House. This is not a neutral or recessive approach to colour choice to conserve heritage values. The new building's colour scheme and 'crazy-panels' approach and the scale disparity of the new building will compete with Denistone House. The new building's external cladding to be redesigned to provide a neutral back drop to Denistone House.

HIS includes both comments for the new building and for conservation works to the Denistone House HIS and seems to state that the design has a positive impact, yet also states the disparity between scale is successfully



addressed through the sympathetic design of the podium as modulated built form, scale, splayed and height elements used. The HIS has not addressed the protrusion of the podium outside the envelope near Denistone House (Concept/stage 1 approved plans). From a heritage point of view, heritage issues have not been adequately addressed per the conditions.

Council's Heritage Officer has raised concern that HIS has overly focused on matters addressed in Stage 1 concept. The purpose of the HIS for Stage 2 development should be to evaluate the new building and landscape design to improve heritage impact outcomes. The heritage consultant was required to be part of the design process to refine design to improve heritage values conservation rather than just comment on handed-over design. The applicant should redress the above concerns and conditions of consent in the Stage 2 application.

**d. Condition C10 Conservation Management Plan (CMP) (Denistone House and the Stables)**

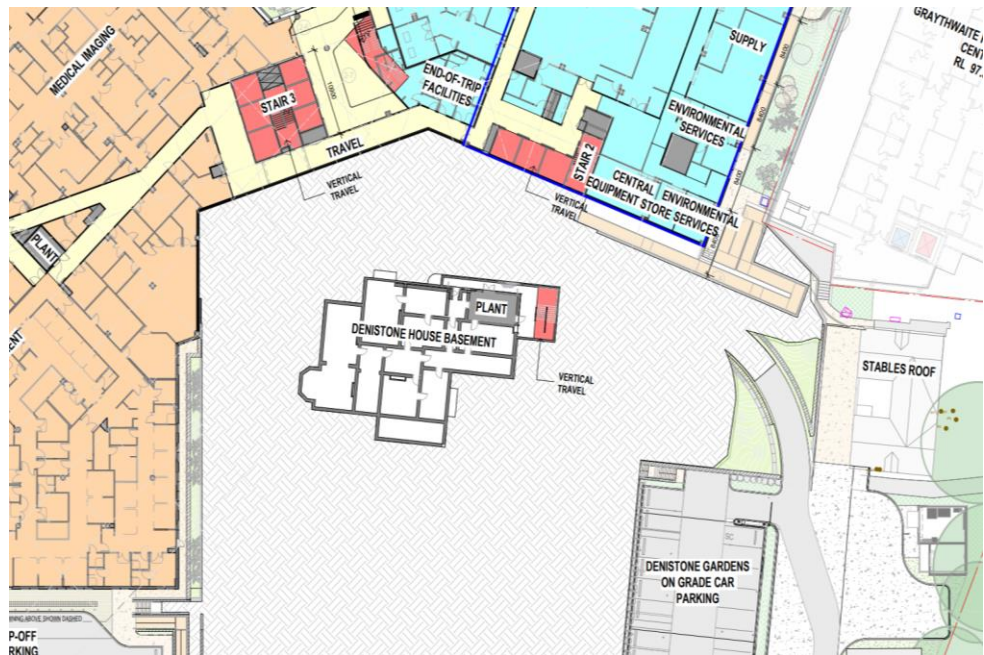
The CMP 2016 has been updated to CMP 2023, provides details about how the CMP will be adopted by the applicant and used in operational activities for Health infrastructure and the site.

- i. **The Statement of Significance (SOS)** for the Denistone House and the Stables has been updated.
  - Applicant to advise if it intends to formally approach Council to address the inconsistency between the SOS attached to Schedule 5 of Ryde LEP and in the SHI register.
- ii. **SSD Details must be excluded from CMP.** The CMP includes discussions on the SSD. This is not appropriate as it addresses development assessment matters, and therefore does not develop a CMP that looks at the what's best for the heritage items first, notwithstanding any development applications/ consents that may subsequently eventuate in the site.
  - It is recommended any reference to the SSD is deleted from the CMP and such matters to be addressed in a SSD's EIS. HIS and other relevant documents.
- iii. **Conservation Policies – Use of the building** CMP p207
  - Denistone House - EIS, Architecture plans and CMP indicates the house to continue to be used for education and administration uses, EIS p68/ CMP p207. The CMP has not considered other compatible uses, which a CMP should do. The use of part of the ground floor of the house for retail or tea rooms to be evaluated, as public access to the house would be a positive heritage impact and the enjoyment of house, could for part of the healing garden precinct.
  - The Stables – the CMP blatantly states the use of the Stables has not been addressed, which is not appropriate for the CMP and contrary to CMP best practice. This implies the CMP has been directed by the applicant's needs, rather than what's best for the heritage items.

- CMP to be updated to address the Stables. The use of both heritage items raised by Council in Stage 1.
- iv. **Conservation Policies - Curtilage, Setting and Views**, CMP p216,
  - It is unclear how this policy area has been adequately addressed in the EIS/ design plans/ HIS. There appears to be disparity between the development proposal and the CMP. For example, Policies 99/100/101 regarding streetscape presentation, proximity of development enhance and not detract, retention of significant views and Policies 103/104 requiring item remain prominent with no significant change to ground levels. The architectural details does not adequately address these policies.
- v. **Conservation Policies Heritage Interpretation**, CMP p217
  - There seems to be no policy for the Stables. This must be addressed in conjunction with establishing compatible uses.
- e. **Condition C11 Heritage Interpretation Strategy**,
  - Applicant to establish at which stage this will be done. Details should be provided to Council and the DPE.
- f. **Condition 13 Protection of Heritage Items during construction**
  - This matter has not been addressed in the Construction Management plan. Details of how this will be incorporated in the Construction Management Plan must be provided with the application for further review by Council.
- g. **Design improvement of 'Denistone Gardens' at-grade carpark and gardens**

The following suggestions are made to improve the Denistone Gardens:

- The gardens in front of Denistone House should be redesigned and enlarged to provide a true rectangular garden in front of the full-width of the house (odd shape in plans), and
- The at-grade car park adjacent to the garden should be reduced by 50% or deleted and converted to additional garden area to facilitate a true rectangular garden in front of the house, provide a better heritage interpretation, provide better views of the house and the Stables from the street and to add to garden-healing space for patients, families, carers, allied health workers.
- It is questioned whether the at-grade car park is required at all, given the proximity of the at-grade carpark with the MDCP and the limited 'open space' provided on site with the intensity of development from the new building/ MCDP/ other existing hospital uses.
- Concern is also raised about the design details relating to garden area behind the at-grade carpark and to north of the Denistone House. It shows a 'vertical travel' and sketches imply grade separation



**Figure 2: Vertical travel marked adjacent to Denistone House**

### 3. Conservation works to Heritage Item

- a. **Denistone House:** It is recommended that standard heritage mitigation measures/ conditions of consent to be applied by DPE, including all works to be undertaken under the supervision of an appropriately qualified and experienced heritage practitioner.
- b. **The Stables:** It is recommended that standard heritage mitigation measures/ conditions of consent to be applied by DPE, including all works to be undertaken under the supervision of an appropriately qualified and experienced heritage practitioner.
- c. **Conservation management Plan:** The CMP to be updated to address compatible uses to ensure the Stables has an ongoing use/ purpose as a matter of priority.

### 4. Architectural/Urban Design

The proponent and architects have demonstrated a quality response to many of the complex circulation, site structure, landscaping and building location issues. In particular, the retention of heritage and landscaping across the site is supported.

Some elements that require further design development include:

- The on-grade Denistone House carpark
  - Denistone Road frontage and setback
  - Hospital elevation, articulation, design and materials.
- a. The on-grade carpark facing Denistone Road is awkwardly located and does not complement the careful site planning, the heritage items or Denistone Road in particular:

- i. The Denistone Gardens on-grade carpark should have the same footprint as the lower ground arrangement. The current footprint impacts on the curtilage to the heritage item and pedestrian access to the main entry.
  - ii. The Denistone Gardens on-grade carpark should not encroach into the alignment between Denistone House and Denistone Road. The park should be increased in size to align with the walkway between the main entry loop road and Denistone Road (see diagram). There should be a direct and straight main entry walkway between Denistone Road and Main Entry Road (see diagram).
  - iii. The Denistone Gardens on-grade carpark should be integrated more into the overall design for the front entry by deleting the ramps on the street frontage.
- b. A setback to Denistone Road is required to acknowledge the future of Denistone Road as a highly pedestrianised link between the Hospital and Eastwood, with potential for a cycle way and avenue planting.
  - i. A generous setback of between 5 to 7m should be achieved that incorporates a generously wide (double width) footpath and landscaping/ planting. Ramps, walls, and level changes should be relocated away front the frontage.
  - ii. The main pedestrian entry - The setback should be generously wide, double the size currently shown to make is legible as the main entry to the hospital.
  - iii. Hospital parking should not impact on on-street parking for the public.
  - iv. A generous setback is also required to reduce the visual impact of the large structures on the residential setting on the opposite side of the road and to allow sufficient space for street tree planting and landscaping.
- c. Further refinements to façade articulation and materials would strengthen the relationship of the proposal with the heritage item (refer to heritage comments). The design of the green cladding vertical sections of the elevations should be redesigned to relate better to the context of Denistone. The green vertical cladding is tired and cheap looking, this exact same cladding is use in so many recent hospital developments across NSW (Wagga Wagga, Randwick, and others). It is preferable the design response to elevations emerges from local character and place. It results in a very bulky, unattractive building which does not respond to the character of the place and maximises bulk. The following additional issues should must be addressed:
  - i. Such large elevations require greater modelling and articulation with a variety of materials. The use of a mix of materials some of which are natural materials such as brick is preferred.
  - ii. The elevations should be designed to reduce bulk and the appearance of height with the use of a base, middle and top as a primary proportional device within which greater modelling and material changes can occur.
  - iii. Although acknowledged that the horizontal cladding parts of the elevations have attempted to respond to heritage, these too create very bulky elements as there is no vertical articulation.



- iv. Both the vertical and horizontal cladding accentuates the buildings bulk and increases the apparent scale of the buildings.
- v. It would be welcomed if Health Infrastructure took leadership to improve the architectural design of the hospital building to show innovation in response to each place, and better elevation design.

The marked-up plan below relates to the comments above:



**Figure 3: marked up plan relating to comments above**

## 5. Open Space and public Access

The proposal identifies possible improvement of vegetation within the Blue Gum High Forrest area through proactive management, which is a positive outcome. The proponent should be required to enhance the public access through this Blue Gum high area of the site (southwestern corner) by constructing new and enhancing existing suitable walking paths. This will improve the ability of the public to utilise this area for passive recreation and go some way to addressing an accessibility issue identified in Council's Open Space Future Provision Strategy (2021). At a minimum a direct connection from Rydedale Road through the site (Blue Gum High Forest area) towards Denistone Road should be provided to improve the connection to Denistone Park.

Public access over the entire site should be confirmed in the conditions of consent to facilitate public use of the area for passive recreation.

## 6. Tree and Landscaping

The use of vegetation on the roof as detailed within the landscape plans is applauded. To further enhance the space and increase its usability (particularly during hot

weather) the investigation for the planting of trees (or alternate means to provide shade) in these areas is sought.

The proposal indicates removal of 28 Trees, (45 already approved for removal as part of stage 1) which are all detailed and assessed within the arboriculture report provided. 150 tree plantings are proposed and the Canopy coverage over the site is moving from 45% to 53.4%. This is considered very positive and acceptable.

In preparing the Landscape Plans the reference to the Greener Places Design Guide and specifically the Open Space for Recreation and Urban Tree Canopy sections is welcomed.

## **7. Stormwater Management Design**

General requirements:

- a. The Stormwater design to be in accordance with Council DCP 2014 8.2 stormwater management technical manual. DCP specifies any new Council Pipe shall be, at least, 375mm diameter.
- b. New Pipe proposed in Council Land, including the connection from the boundary pit to the proposed pit shall be STEEL REINFORCED CONCRETE PIPE, class 4, of minimum diameter  $\geq$  375mm.
- c. 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 on the long section, and the type of RCP pipe (steel reinforced Class IV).
- d. Details of the connection to Council pits shall be included in the Stormwater Management Plan.
- e. Minimum 1% slope to be proposed for new drainage lines in Council land.
- f. Existing Council drainage infrastructure details including, diameter, etc. shall be shown on the plans, including details of the connection with the proposed stormwater system.
- g. Council Details shall be incorporated, from Council Standard Drawings.
- h. Any proposed pipes in Council land to include Rubber ring joints.
- i. Any proposed junction pit in Council land to be constructed with concrete lid.
- j. Civil design (Revision C) prepared by ACOR consultant Pty Ltd dated 21 June 2021 shall be amended to reflect the following:
  - Please ensure the existing Council drainage infrastructure including pits and pipes (details including, diameter, etc.) are clearly shown with in a different layer to proposed drainage.
  - For ease of assessment of the plans please ensure that Council pit



Please refer below Council stormwater diagram for your reference:



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 particularly in regard to heritage, building design, traffic and public domain upgrades.

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