

Department of Planning and Environment 4 Parramatta Square, 12 Darcy Street Parramatta NSW 2124

Your Ref	SSD-45576956
Our Ref	NCA/12/2022
Contact	Alex McDougall
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02/06/2025

ATTN: Patrick Nash,

# COUNCIL SUBMISSION TO REQUEST FOR ADVICE ON EIS – CMRI GENE TECHNOLOGIES BUILDING (SSD-45576956) AT 178 HAWKESBURY ROAD, WESTMEAD NSW 2145

I refer to the above request to provide advice on the EIS (and accompanying information) in relation to SSD-45576956 at 178 HAWKESBURY ROAD, WESTMEAD NSW 2145. Council has reviewed the application and accompanying documentation and provides the following comments.

## <u>Urban Design</u>

#### Request for Additional Information

- Sections to include neighbouring development and context including development across Hawkesbury Road with levels. Sections to include existing ground level line.
- Include shadow diagrams on Winter Solstice every hour from 9am to 3pm. Plans to be more legible and include cadastre.

#### Street Activation and Street Address

- The building entrance from Hawkesbury Road appears secondary, recessed and below natural ground level resulting in poor wayfinding, compromised sightlines and vertical circulation in the front setback. This street entrance should be given more prominence with improved access and safety by:
  - removing the deep indents to the entrance.
  - widening the articulation and entrance
  - o removing the ramping by setting the ground floor level at the street level.
- The Level 2 (Ground) Floor is primarily taken up by services resulting in an inactive ground floor frontage to Hawkesbury Road, Link Bridge and Research Lane. This outcome challenges the vision from the Transport NSW Westmead Place based Transport Strategy 2022 which allocates an active frontage to Hawkesbury Road (see figure below). It is recommended that services be moved to the basement and, where not achievable, sleeving all ground floor frontages with an active use.

Contact us:



Figure 3-9 Westmead Place Strategy structure plan

# Building Slab Response to Topography

• The ground floor level is set at one continuous slab level despite variation in topography and natural ground level resulting in the Medical Research building (Phase 1) being below street level creating a poor street interface. It is recommended that the building slab level step with topography to create a flush entrance from Hawkesbury Road (RL 22.7) and ramp internally from the Kids Park within the atrium between the two levels of the slab.

## **Building Bulk**

- When both stages are complete the building appears very bulky and imposing to the public domain with a building length of 65m and width of 56m. It is suggested that a greater separation of 12m between the CMRI Stage 1 and CMRI Phase 2b be implemented to create a distinct building break.
- The lowered height of atrium portion has the intent of breaking up massing. The building height of the atrium would benefit from being further lowered to ensure this portion reads as a separate element and reduces bulk, particularly when viewed from the Kids Park.

## Façade

- Awnings are to be provided to the Hawkesbury Road and Kids Park frontage to provide weather protection and amenity.
- The Hawkesbury Road elevation shows the expression of the Phase 2A link through an indented glass vertical element set at a lower height. This element already sits next to a vertical glass portion part of the existing Ainsworth Tower which has the intent of

creating a break in building bulk. Therefore, the repeated glass vertical element of Phase 2A is not necessary and the grid of metal framing should be extended to create a simplified consistent street wall.

- The building elevation facing Kids Park shows multiple vertical modulations expressed through different materials. To reinforce the continuity of the streetscape, the terracotta framing system should extend to meet the glass atrium with the grid of metal cladded framing removed.
- The building elevations facing the Kids Research Building and Research Lane have large vertical portions of services expressed through metal louvers. The number of louvers should be reduced and moved to the roof where possible.
- The number of signs facing Hawkesbury Road appears excessive creating visual pollution detracting from the street character. Suggest the removal of the roof sign facing Hawkesbury Road sitting above the glass 2A link as it is not integrated into the architecture of the building and already has an above fascia sign in the same vertical datum.

# Public Domain

## Request for Additional Information

- Provide a set of coordinated public domain alignment drawings in coordination with civil drawings. These drawings must include proposed levels for footways, forecourt and shared path. They should clearly document road, footway, kerb and gutter levels and crossfalls for site. Refer to Parramatta Public Domain Guidelines 2017 for all the requirements.
- In addition to levels throughout publicly accessible areas, the proposed relationship between private and public domains should be documented. Alignment information may be included on landscape or architectural plans to demonstrate integration of buildings and private landscaping with the surrounding public domain. Provide cross sections showing existing public domain levels and proposed changes.

## Comments

- On-grade planting must not exceed 1:4 gradient for mass planted and grassed areas. Planting areas steeper that this will be prone to erosion during severe rain events and grassed areas on such slope won't be possible to mow.
- The grass swale within the landscaped area along Hawkesbury Road presents a poor outcome for the main road frontage. It is recommended to replace it with underground drainage pipes (if not part of an overland flow flooding path).
- The landscape package does not clearly indicate whether trees removed along Hawkesbury Road will be replaced. Provide trees in the front set back along Hawkesbury Road to maintain canopy cover for the ones removed along Hawkesbury Road.
- The proposed ramp and retaining wall along Hawkesbury Road result in a poor outcome. The staff entry should be open and inviting, with good visibility and clear sightlines from Hawkesbury Road.
- The existing frontage along the ambulance driveway, facing Kids Park, is currently blank. Introduce tree planting on that edge within the proposed planting areas along this edge to enhance visual interest and appeal.
- The deep soil diagrams are unclear. If they represent both existing and proposed deep soil areas, the proposed area appears significantly reduced. Continuous deep soil zones are essential not only for supporting healthy canopy trees but also for effective

surface drainage. In diagram 3, the garden beds along Ambulance Road are included in the total deep soil calculation, however, these are part of the existing building layout and should not be counted as additional deep soil.

# Trees & Landscaping

## **Overall Comments**

The size and general arrangement of the ground floor external interface landscaped areas, internal arrival garden / atrium, courtyard and the roof terrace are supported in principle. There are a few recommended changes as per the following:

- Within the proposed planting palette, some of the plants are not supported as they will not thrive in these spaces or are too large for the space available.
- In addition, some of the soil volume and soil depth indicated is insufficient and will not enable the proposed plants to thrive.
- The planting plans have not been completed.

## Planting Palette

The Connecting with County native planting palette is supported and encouraged, however, there are some species which need to be replaced, including a weed species, which are recommended to be replaced with suitable, alternative species, for example:

Ground floor:

- The Schefflera arboricola, (Dwarf umbrella tree) is considered a minor or potential environmental weed in NSW and is to be replaced with a suitable, native shrub species.
- The *Linum marginale* (Native Flax) is short-lived perennial and should be replaced with a suitable, hardy native species.
- The *Dichelachne micrantha* (Shorthair Plumegrass) is a sparse perennial grass and should be replaced with a suitable, hardy strappy native species.
- The *Einadia hastata* (Berry Saltbush) a sparse, straggly herb and should be replaced with a suitable, hardy groundcover native species.
- It is recommended some of the palms and/or tree ferns proposed within the internal raised planter of the arrival garden are relocated into the external raised planter at the atrium entrance (off Ambulance Road) to :
  - a) reduce the number of proposed palms and/or tree ferns in the planters as they appear crowded, and;
  - b) it will enable the look and feel proposed inside to continue to flow externally.

Roof terrace:

- The *Tristaniopsis laurina* (Watergum) 200L tree proposed in the small planter on the roof terrace will not grow to maturity due to the lack of available soil in the pot. This should be replaced with an accent / feature shrub, tolerant of drought conditions.
- Replace the *Tristaniopsis laurina* (Watergum) 200L tree proposed close to the building façade on the roof terrace to avoid the canopy clashing with the building and requiring on-going pruning building clearance. Replace the tree with a suitable, small, fastigiate tree species or shrub.
- There are 3 x Corymbia hybrid 'Summer Beauty' (Flowering Gum) 400L trees shown within a small planter with insufficient soil volume. The trees are shown to be planted against the building façade and will require on-going pruning for building clearance which is not supported by Council. In addition, there is insufficient room for the trees to be planted in the narrow planter - Council does not support the rootballs being 'cut to fit' a small space. These trees should be replaced with a suitable small, native shrub

tolerant of this constrained, rooftop environmental condition.

• In addition the *Atractocarpus fitzalanii (syn. Randia fitzalanii* - Native Gardenia) does not thrive in this region. It should be replaced with a suitable, hardy native shrub species.

An updated planting plan and planting schedule is recommended to reflect the above suggestions. The proposed tree canopy cover plan is recommended to be updated to reflect the above changes.

#### Soil Volume – on structure

The groundcover planting on slab detail 2 show the soil on slab to only be 200mm depth. This is insufficient and will affect the proposed plantings' health and condition over time. It is recommended the soil depth for the ground cover on slab planting detail is increased to a minimum 500mm depth to ensure the proposed shrubs and groundcovers will have adequate soil volume to thrive. If required it is recommended either structural soil and/or modular cells are installed below the paving areas, and in any slab-set downs, to enable the acceptable soil volume and depths are achieved over the basement structure and rooftop terrace to ensure the plants will thrive for the long-term.

## Existing Trees

T1 to T4 (4 total) *Platanus X acerfolia* (London Plane) trees to the Hawkesbury Road front setback, are shown to be removed to facilitate the development. This is supported by Council.

# **Traffic**

Car Parking:

- Required: 426 spaces
- Proposed: 47 basement spaces + 9 retained on Research Lane
- Comment: Significant shortfall, but supported due to sustainable transport goals and good public transport access. Department should consider requiring a pre-allocated parking and booking system to minimise motorists circulating the road to find parking. A condition should be included implementing a Green Travel Plan.

Bicycle Parking:

- Required: 111 spaces
- Proposed: 58 spaces
- Comment: Non-compliance with DCP; recommendation to increase to 111 to support active transport and support under-provision of car parking.

Motorcycle Parking:

- Required: 1 space
- Proposed: 0 spaces
- Comment: Space available to provide; recommend a condition be imposed requiring it.

Car Park Design:

• The blind aisle extension next to parking spaces No. 1 and 47 does not comply with the requirements of AS 2890.1 which requires at least 1m to be provided for access to and from the spaces. Further, the column next to space no. 47 encroaches the design

envelope as per figure 5.2 of AS 2890.1. However, it is noted that the width of parking spaces is 2.5m whereas staff parking can be reduced to 2.4m. Accordingly, the plans should be amended to reduce the width of spaces No. 1, 45, 46, and 47 to 2.4m to allow for at least a 1m blind aisle extension. Similarly, it is noted that columns are obstructing the design envelope for the parking spaces Nos: 6, 26, 31 and 34 which will need to be addressed. Meeting these requirements should not impact any structural elements of the car park and can be conditioned.

Traffic Generation:

- The traffic analysis does not seem to have taken the objective adopted through state government planning (Place Plan and Place Based Transport Strategy) for Hawkesbury Road to be relied on less for Westmead access in favour of Darcy Road and Bridge Road.
- Peak hour assumptions not fully justified, but impact considered manageable due to limited parking and good public transport.

Loading Dock:

 HRV swept paths appear to interfere with Parramatta Light Rail (PLR) tracks. Must be remedied or alternatives requires confirmation this is acceptable from Transport for NSW (TfNSW).

Construction Traffic Management Plan (CTMP):

 A preliminary CTMP has been provided. In section 4.4, it is noted that the applicant is saying that the pedestrian footpath may need to be closed during some stages of the development. It is noted that to occupy the footpath at any stage of the development, a separate approval for a Temporary Road/Footpath Occupancy will be required in accordance with Roads Act requirements. However, Council is unlikely to grant this approval unless it is during off-peak, and for exceptional circumstances such as a crane install or public domain works. The CTMP must acknowledge that the surrounding area is a sensitive and high pedestrian area and preserving both pedestrian access and safety is a priority. This matter can be addressed post approval as part of a CTMP condition.

Recommended conditions are provided at Appendix 1.

## Transport Planning

It is not clear how the building and its entrances integrate with the wider health precinct. For example, the report talks about pedestrian access via Ambulance Lane, but it is not clear what Ambulance Lane looks like from the report. Similarly, it is expected that cyclists coming from the east will access via Research Lane, but it is not clear how cyclists from north, or from the Health precinct, access the site. There should be good active transport connectivity to the Health precinct.

## Universal Access

- Ensure the active leaf of all doors provides a clear opening no less than 850mm.
- Access must be provided to all common features within the development, in accordance with BCA Table D3.1 Requirements for access for people with a disability.
- Low-level thresholds should be provided at all common doors accessing outdoor

areas.

- Transitions between differing surface materials must be smooth. Design transition height shall be 0 mm. Construction tolerances are as follows:
  - a) 0 ±3 mm vertical.
  - b) 0 ±5 mm, provided the edges have a bevelled or rounded edge to reduce the likelihood of tripping. (AS1428.1.7.2)
- Equipment and furniture within communal areas must include accessible and inclusive features suitable for individuals with mobility and other impairments. Note: AS1428.2 provides guidance on accessible furniture, including reach ranges and varying heights of tables and seating with backrest and armrests.

#### **Environmental Health**

#### Contamination

• Council accepts that the Detailed Site Investigation can occur post-demolition to minimise disruption to the site.

#### Acoustic & Vibration

• Conditions should be imposed to ensure acoustic and vibration minimisation strategies are followed to protect surrounding sensitive areas.

#### Waste Management

• It is recommended that conditions are implemented to ensure compliance with all submitted reports and recommendations.

#### **Conclusion**

Council appreciates the opportunity to comment on the above application, are supportive of the continued investment in health infrastructure within the City of Parramatta and look forward to continued collaboration. It is noted that this is the recommendation of Council officers, and this submission has not been endorsed at a Council meeting.

Should you wish to discuss the above matters, please contact me on the details listed above.

Yours sincerely

Alex McDougall Team Leader, City Significant Development Team Development and Traffic Services Unit

# **APPENDIX 1 – DRAFT CONDITIONS**

1. The Department should consider including a condition for pre-allocated parking spaces and a booking system for the on-site car park as recommended in the TIA. It is considered this measure will also act as a deterrent for staff that were not able to book a space to arrive by private vehicles as opposed to a scenario where more vehicles arrive, and vehicles that did not find parking in the car park, circulate roads to find parking.

## Prior to the release of a Construction Certificate

2. The PCA shall ascertain that any new element in the Car Park not illustrated on the approved plans such as columns, fire safety measures and the like do not compromise appropriate manoeuvring and that compliance is maintained with AS 2890.1, AS 2890.2 and AS 2890.6. Details are to be illustrated on plans submitted with the construction certificate application.

**Reason:** To ensure appropriate vehicular manoeuvring is provided.

- A minimum of 111 bicycle spaces/racks are to be provided on-site and used accordingly. The bicycle storage/racks are to comply with AS2890.3-2015. Details are to be illustrated on plans submitted with the construction certificate.
  Reason: To comply with Council's parking requirements.
- 4. Parking spaces are to be provided in accordance with the approved plans and with AS 2890.1, AS2890.2 and AS 2890.6. A total of 47 parking spaces are to be provided including two accessible spaces and 11 EV Charging bays. In addition, the car park layout is to be amended to address the following matters:
  - a. A minimum blind aisle extension of 1m is to be provided next to parking spaces No. 1 and No. 47. The width of the parking spaces can be reduced to 2.4m to achieve this noting that this is a staff car park.
  - b. The location of the columns are to comply with figure 5.2 of AS 2890.1 and not encroach the design envelope. In this regard, adjustments are required for parking space nos. 6, 26, 31, 34 and 47

Details are to be illustrated on plans submitted with the construction certificate. **Reason:** To comply with Council's parking requirements.

5. A minimum of one (1) motorcycle space is to be provided on-site and used accordingly. The dimensions of the motorcycle spaces are to comply with Clause 2.4.7 and Figure 2.7 of AS 2890.1-2004. Details are to be illustrated on plans submitted with the construction certificate.

**Reason:** To comply with Council's parking requirements

- 6. Prior to the issue of a Construction Certificate, the applicant shall submit a Construction and Pedestrian Traffic Management Plan (CPTMP) to the satisfaction of Council's Traffic and Transport Manager for review and approval. The CPTMP shall be prepared by a suitably qualified and experienced traffic consultant and adhered to during all stages of construction. The following matters must be specifically addressed in the CPTMP:
  - a. Dedicated construction site entrances and exits, controlled by a certified traffic controller, to safely manage pedestrians and construction related vehicles in the frontage roadways,
  - b. Turning areas within the site for construction and spoil removal vehicles, allowing a forward entry and egress for all construction vehicles on the site,
  - c. The location of proposed Work Zones in the egress frontage roadways,
  - d. Location of any proposed crane standing areas,

- e. A dedicated unloading and loading point within the site for all construction vehicles, plant and deliveries,
- f. Material, plant and spoil bin storage areas within the site, where all materials are to be dropped off and collected,
- g. The provisions of an on-site parking area for employees, tradeperson and construction vehicles as far as possible,
- h. A detailed description and route map of the proposed route for vehicles involved in spoil removal, material delivery and machine floatage and a copy of this route is to be made available to all contractors,
- i. A detailed description of locations that will be used for layover for trucks waiting to access the construction site,
- j. Proposed construction hours,
- k. Estimated number and type of construction vehicle movements including morning and afternoon peak and off peak movements,
- I. Construction program that references peak construction activities and proposed construction 'Staging',
- m. Any potential impact to general traffic, cyclists, pedestrians and bus services within the vicinity of the site from construction vehicles during the construction of the proposed works,
- n. Measures proposed to mitigate any associated general traffic, public transport, pedestrian and cyclist impacts should be clearly identified, and,
- o. The plan may be required to include restrictions on the number of trucks that can access the site in peak hours and a requirement for the developer to provide video footage of the frontage of the site on a weekly basis so that Council can enforce this requirement,
- p. Evidence of Roads and Maritime Services concurrence where construction access is provided directly or within 20 m of an Arterial Road if applicable,
- q. A schedule of site inductions on regular occasions and as determined necessary to ensure all new employees are aware of the construction management obligations,

The CPTMP is to include the provision of a sign on the hoarding that provides a phone number and email address for members of the local community to make enquires or complaints regarding traffic control for the site. The construction company for the site is to provide a representative for meetings that may occur once a month and may include representatives of the local community and Council staff to discuss traffic control at the site.

Written concurrence from Council's Traffic and Transport Services in relation to installation of a proposed 'Work Zone' restriction in the egress frontage roadways of the development site. Application fees and kerbside charges for 6 months (minimum) are to be paid in advance in accordance with the Council's Fees and Charges. The 'Work Zone' restriction is to be installed by Council once the applicant notifies Council in writing of the commencement date (subject to approval through Parramatta Traffic Committee processes). Unused fees for kerbside charges are to be refunded once a written request to remove the restriction is received by Council.

All traffic control devices installed in the road reserve shall be in accordance with the NSW Transport Roads and Maritime Services publication 'Traffic Control Worksite Manual' and be designed by a person licensed to do so (minimum RMS 'red card' qualification). The main stages of the development requiring specific construction management measures are to be identified and specific traffic control measures identified for each. Approval shall

be obtained from City of Parramatta Council for any temporary road closure or crane use from public property.

**Reason:** To ensure the appropriate measures have been considered during all phases of the construction process in a manner that maintains the environmental amenity and ensures the ongoing safety and protection of people.

## During Construction or Works

 Occupation of any part of the footpath or road at or above (carrying out work, storage of building materials and the like) during construction of the development shall require a Road Occupancy Permit from Council. The applicant is to be required to submit an application for a Road Occupancy Permit through Council's Traffic and Transport Services, prior to carrying out the construction/restoration works.
Reason: To ensure proper management of Council assets.

8. Oversize vehicles using local roads require approval from the National Heavy Vehicle Regulator (NHVR). The applicant is to be required to submit an application for an Oversize Vehicle Access Permit through NHVR's portal (www.nhvr.gov.au/about-us/nhvr-portal), prior to driving through local roads within the City of Parramatta LGA. **Reason:** To ensure maintenance of Council's assets.