

Department of Planning and Environment

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Your ref: SSD 38600121

Megan Fu
Infrastructure Assessment
Planning Group
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
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Subject: EHG Comments on the Environmental Impact Statement for Alexandria Health Centre 38-32 Bourke Road, Alexandria (SSD-38600121)

Dear Ms Fu

Thank you for your e-mail received on 20 July 2022 requesting advice from the Environment and Heritage Group (EHG) on the Environmental Impact Statement (EIS) for the above project. EHG has reviewed the EIS and provides comments and recommendations at Attachment A.

Should you have any queries regarding this matter, please contact Angela Taylor, Senior Conservation Planning Officer on 9585 6146 or angela.taylor@environment.nsw.gov.au

Yours sincerely



15/08/22

Susan Harrison
Senior Team Leader Planning
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Biodiversity and Conservation

Attachment A – EHG comments and recommendations on the Environmental Impact Statement for Alexandria Health Centre 38-32 Bourke Road, Alexandria (SSD-38600121)

EHG has reviewed the submitted EIS and related appendices and provides the following comments and recommendations

Proposed Impacts to Street Trees

Three street trees in the Council owned road reserve adjacent to the development site are identified as Trees 1-3 respectively in the submitted Arboricultural Impact Assessment (AIA) prepared by arboreport dated 9 June 2022. The proposed development and the requirement to dedicate a laneway to Sydney City Council along the western boundary will require the removal of Tree 1 as identified in the AIA. The development will also potentially result in a major encroachment on the tree protection zone (TPZ) of Tree 2 including possible impacts to the structural root zone of this tree. Although, the AIA advises that the actual extent of encroachment on the TPZ and SRZ of Tree 2 cannot be verified until the existing building is demolished noting that the roots of this tree may have been deflected by the existing buildings footings.

The Planning Group has advised that impacts to street trees will be subject to a separate approval process and hence is outside the scope of the issued BDAR Waiver and the submitted SSD. It is also understood that the Planning Group will consider whether Sydney City Council raises any issues about impacts to these trees (as their owner) in their submission on the SSD as part of the assessment process.

As the AIA was submitted as part of EIS package, EHG provides the following comments in relation to the submitted AIA and proposed impacts to Tree 2:

- In relation to Tree 2 the AIA advises that this tree will be subject to minor pruning works to provide clearance of the proposed building. Noting that submitted plans indicate that the area adjacent to Tree 2 will consist of a Deep Soil Area where new trees will be planted it is unclear as to why Tree 2 needs to be pruned.
- The AIA (Table 7) advises that the new building encroaches on Tree 2 up to 31.5%. It is noted that the encroachments to Tree 2 will be associated with footpath widening, demolition of the existing building, land remediation works and possibly by stormwater management infrastructure and new services as opposed to the footprint of the new building. EHG therefore recommends that the submitted AIA is amended to reflect this.
- To help assess impacts to trees identified for retention, EHG recommends that the proposed SSD is accompanied by a cut and fill plan that considers all aspects of the required development including but not limited to required land remediation and construction works, landscaping and the provision of services.
- The AIA does not advise if Tree 2 can survive a major encroachment of up to 31.5% as well as an unspecified encroachment to its mapped SRZ. EHG recommends that further clarification is required on this matter.
- The AIA further advises that the AIA needs to be reviewed upon the preparation of stormwater, landscape, revised architectural plans or others. It is however noted that a Stormwater Plan is provided as part of the submitted Civil Engineering Draft SSDA Report and that a Landscape Report has accompanied the SSD. The AIA therefore requires amendment to consider these plans/documents as well as all other impacts associated with the proposed development.
- The Tree Location Plan in the AIA should be updated to include the indicative location of Tree Protection Fencing and Trunk battens. The Landscape Report prepared by Place Design Group Dated 6 July 2022 indicates that four new trees (*Eleocharpus eumundi*) will be planted on the development site to mitigate the loss of Tree 1. It is currently unclear as to what

offsets will be implemented if Tree 2 does not survive proposed construction works. EHG therefore recommends that further clarification is provided on this matter.

Flooding

The flood modelling includes existing conditions only. Post development and future conditions must also be modelled. Specifically, the ultimate conditions with the proposed laneway network must be modelled. The new laneways will likely result in new flooding to the west and south of the site if water is conveyed from O'Riordan Street. This new flooding may lead to different flood levels for the development. If the laneway design is not available, a reasonable set of assumptions should be made for the flood model.

The subject site is located approximately 50m from Sheas Creek and is subject to mainstream flooding. The site will become isolated due to floodwater. This may occur in 'frequent' floods, having a 10% chance of occurring each year. The proposal includes using upper floors of a new building as a hospital. The proposal of a hospital on highly flood prone land should receive the highest level of scrutiny due to the critical and sensitive nature of the proposed use.

The SES should be consulted for advice. Without advice from the SES, EHG would not support the proposal for a new hospital in this location.

Due to frequent flooding, there may be no access to or egress from the hospital. When considering access to the new building, flooding of surrounding streets must also be considered. Many of the surrounding streets are impassable not only in a 1% AEP flood, but much more frequently. Even from the 5% AEP, Bourke Road at the driveway may be flooded with water too deep for vehicle access.

Further detail regarding the duration and frequency of inundation is required and should be provided to the SES for comment. The referenced 'critical storm event' of 90 min is only critical in terms of peak flood level estimation. Long duration events must be considered as these will dictate the maximum duration of isolation. The site is affected by mainstream flooding, so longer durations can be expected.

Utility services such as power and water may be unavailable at the same time as lack of access and egress due to flooding. The capacity for hospital patients, staff and visitors to shelter in place for an unknown period warrants further scrutiny. Further detail around back up services may be needed e.g., generators and water storage, including their location (preferably above the PMF).

A basement is proposed, and all entry points must be the higher of the PMF flood level and the 1% AEP event plus 500mm freeboard. For all potential flood access points to the underground levels of the development, the level of the entry and relevant flood level must be stated (preferably tabulated to allow ease of comparison), including:

- doorways including fire stairs
- lifts
- driveways
- air vents, including specification of the minimum permissible level(s) for any such openings on architectural drawings.

End of Submission