

7 May 2026

Megan Fu
Department of Planning, Housing and Infrastructure
12 Darcy Street
Parramatta NSW 2150
Email: megan.fu@planning.nsw.gov.au

Dear Megan,

Submission to Department of Planning, Housing and Infrastructure- **SSD-105396208**

Development Application: SSD-105396208

Address: 490 Chapel Road, Bankstown

Applicant: Health Administration Corporation

Submitted by: St Felix Catholic Parish, Bankstown, and LaSalle Catholic College, Bankstown

Introduction

The Catholic Archdiocese of Sydney (CAS), St Felix Catholic Parish (Parish), Bankstown, Sydney Catholic Schools (SCS) and LaSalle Catholic College (LSCC) thanks the Department of Planning, Housing and Infrastructure (**the Department**) for the opportunity to provide this joint comment on the above development application. SSD-105396208 proposes the construction and operation of the new Bankstown Hospital, including two hospital buildings, car parking, site preparation works, tree removal, new vehicle access, internal roads, services, signage and landscaping.

The land directly adjoining the subject site is owned by the Trustees of the Roman Catholic Church for the Archdiocese of Sydney and beneficially owned by the Parish. LSCC is a K-12 school and occupies part of the site under licence from the Parish and is a long-established educational institution. The rest of the site has been identified by the Parish as a development site for future housing to support key worker accommodation next to the new hospital.

The existing buildings on the future hospital site are to be demolished under a separate approval pathway, Development Without Consent under State Environmental Planning Policy (Transport and Infrastructure) 2021 via a Review of Environmental Factors (REF).

CAS & SCS acknowledges and appreciate that ongoing consultation and engagement undertaken by the Health Administration Corporation (**HAC**) in respect of the proposed application. CAS & SCS do not oppose the proposed development entirely. However, CAS & SCS would like to highlight several aspects of the proposal to the Department, and requests that careful consideration be given to the cumulative access, amenity, safety and operational impacts on the Parish & school as a sensitive adjoining land use.

Access to School's Playing Fields

The Parish's land and the school's playing fields are located immediately west of the proposed hospital site and are currently accessed via Raw Avenue, which connects to Chapel Road. Raw Avenue provides existing access to the playing fields. The proposal involves closing and building over

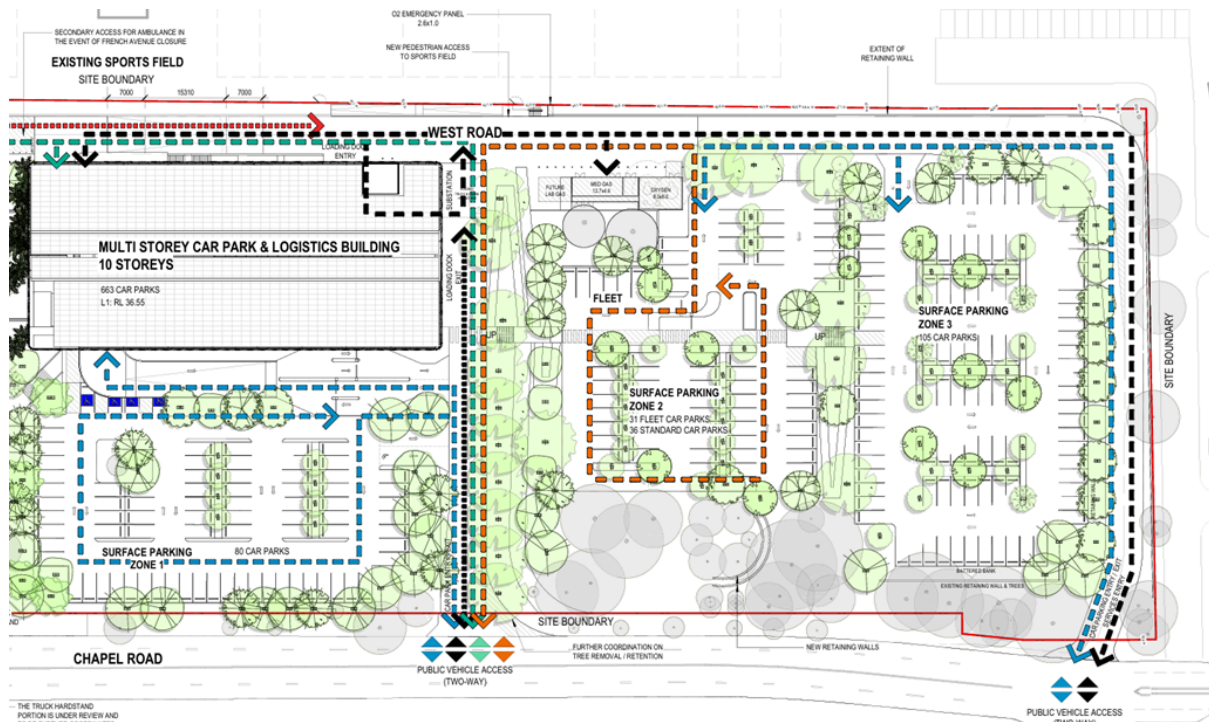
Raw Avenue, which represents a significant change to established access arrangements to the Parish's land and for an essential school facility.

The proposed site plan indicates a new east-west link road (New Link Road) and pedestrian access point from Chapel Road to the playing field. The EIS notes in respect of the new link road that *'public vehicles will not be permitted beyond the three surface car park zones...'* This restriction is not supported. Vehicular access to the entrance of the playing pitches must be permitted where required for school operations, including emergency vehicles, staff access, parent and carer access, and maintenance of the fields. It is imperative that vehicular access is provided to the playing pitches, particularly in case of injury whereby emergency vehicles can get access onto the fields.

Due to the early works REF approval, the SSDA has been prepared on the basis that all buildings on the site have been demolished and the site is vacant. The REF documentation refers to a temporary internal driveway to maintain access during construction. However, no details of this temporary access are provided in the SSDA, despite it being critical to the ongoing operation and safety of the school. The temporary access is required for the full duration of construction and to be designed to ensure safe pedestrian movement. CAS & SCS accordingly requests that any development consent include conditions that protect the operational arrangements of LSCC during both the construction and operation of the proposed hospital.

There does not seem to be any design prepared for pedestrian access along the West Road. Not designing for pedestrian access does not mean that pedestrians will not traverse the edge of the site. CAS & SCS request that segregated pedestrian access is provided along West Road so that hospital staff, patients, families, students and the general public who try to use this road can do so safely and segregated from the hospital traffic.

Figure 1: Proposed Site Plan



Source: Stantec

Development Potential of the Southern Playing Fields

The school's playing pitches are a significant and strategic land holding which form part of the Parish & school's long-term planning for future growth. Beyond their current recreational function, the playing fields provide a critical opportunity to support future growth of the school and associated facilities in response to changing educational, community and operational needs over time.

Maintaining flexibility for the future use of this land is essential. This includes the ability to accommodate additional school facilities, support evolving service demands, or pursue alternative development scenarios if required. Preserving appropriate access arrangements is a fundamental prerequisite to ensuring the land can be efficiently and safely utilised in the future.

The removal of Raw Avenue and the establishment of the east west access link further north eliminates direct and proximate vehicular access to this part of the site. This outcome is sub optimal for both the Parish and LSCC and the proposal unnecessarily risks constraining the future development potential of the school's land. It is essential that the proposed development does not limit the school's ability to access the site or to pursue future development opportunities on the playing fields.

During engagement with the Health Infrastructure team, CAS provided advice that vehicular access to the Parish and LSCC land should be provided off the roundabout where the New Link Road meets the West Road. Access would be shared by the Parish and LSCC, and the number of vehicle movements, if development is approved on part of the playing fields, is estimated to be limited to less than 100 light vehicles a day.

CAS & SCS request that the design of the interchange between the New Link Road and West Road is designed to accommodate a roundabout and future access into the playing fields. This approach would safeguard the long-term strategic value of the land, avoid sterilising future development opportunities and ensure that the current proposal does not preclude reasonable and orderly future use of the site.

Traffic Impacts

The proposed development will result in significant additional vehicle trips along Chapel Road to the east of the site. Chapel Road is also the primary access point for LSCC. The school has concerns regarding the traffic impacts that will occur as a result of the proposal. The traffic modelling confirms that Chapel Road and the Hume Highway corridor are already operating at or near capacity and that conditions will deteriorate further with the hospital development.

During the AM peak, which coincides with school arrival times, the Hume Highway / Chapel Road intersection degrades from Level of Service (LOS) C to LOS D in 2031 with the development, and to over-capacity conditions (LOS E) by 2036. Queue lengths increase to more than 220 metres, with modelling identifying queue spillback between Meredith Street and Chapel Road. These queues are of sufficient length to interfere with access to adjacent uses, including the school.

In the PM peak, conditions are more severe. The Hume Highway / Chapel Road intersection operates above capacity in all modelled years, with delays increasing to over 150 seconds and queues extending to approximately 360 metres by 2036. This directly overlaps with school dismissal times and raises concerns regarding safe and reliable access for students, staff and school bus operations.

While background traffic growth is a significant contributor to congestion, the modelling demonstrates that hospital-generated traffic adds measurable pressure to an already constrained

network, particularly at Chapel Road. For a school, even incremental increases in congestion have heightened safety and operational consequences.

The assessment relies on future TfNSW upgrades to address these impacts; however, the timing for and certainty of these works occurring are not confirmed. In the absence of committed upgrades, the proposal exposes the school to worsening traffic conditions over time, which are not acceptable without specific, enforceable mitigation measures focused on Chapel Road and school-related movements. The application does not clearly demonstrate that traffic generation, access arrangements and servicing will not compromise pedestrian safety in a school environment.

Chapel Road will be the primary access point to the construction site. This will result in a significant number of heavy vehicles utilising Chapel Road for access to the site. No details of the number of trips generated throughout the construction phase has been provided within the Transport and Accessibility Impact Assessment. HAC should be required to provide this information.

It is critical to ensure that impacts to an already constrained Chapel Road are mitigated to ensure the safe and efficient operation of Chapel Road for all users. CAS & SCS therefore request that the Department carefully consider the projected traffic volumes and consider whether additional road upgrades or pedestrian safety measures are required.

Tree Removal

The proposal involves the removal of 66 trees as part of the development, including trees located along the boundary with the school's playing pitches. A further 152 trees are to be removed under separate approval pathways. The proposal indicates that 325 trees will be planted across the site.

The trees between the future hospital site and the playing field make an important contribution to the amenity and privacy of this area of open space. The CGI reproduced in Figure 2 below is an inaccurate representation of the tree planting proposed along this boundary. It illustrates tree planting along the entire boundary, while the proposed landscape plan within the EIS shows tree planting only along part of the boundary. It is requested that this inconsistency be corrected so that the CGI provides an accurate representation of future conditions. Replacement tree planting should be specifically required along the boundary with the school, at sufficient scale and density to provide a level of privacy and amenity.

Overlooking onto School

The proposal includes a 10-storey hospital building that directly overlooks the school's playing fields. As shown in the submitted material and the CGI at Figure 2, multiple levels of the hospital will have direct views over the school grounds and LSCC has concerns about the potential for overlooking. Appendix E (Mitigation Measures) does not address these impacts. It is requested that appropriate design and operational mitigation measures be considered to manage potential overlooking and to ensure the ongoing safety and privacy of pupils using the playing fields.

Figure 2: CGI View from Playing Pitches



Source: Architectus

Failure to Acknowledge the School as a Sensitive Adjoining Use

LSSC acknowledges the consultation and engagement that has occurred between HAC, SCS and the school over an extended period. However the SSDA documentation, particularly the Social Impact Assessment (SIA) does not meaningfully acknowledge LSCC as an adjoining sensitive land use, nor does it demonstrate how potential impacts on the school have been avoided or mitigated.

Educational facilities, particularly those accommodating young children, require a higher level of consideration in relation to noise, air quality, traffic safety, privacy, security, and construction impacts. The lack of explicit assessment of these matters represents a key deficiency in the application. LSCC requests that the Department seek additional information from HAC to address this and ensure that all potential issues are thoroughly considered and addressed.

Timing and Sequencing of Construction

The application does not demonstrate how the timing and sequencing of demolition and construction activities will respond to the school calendar. This is a significant omission given the sensitivity of school operations, including exam periods, enrolment intakes, and vacation care programs.

CAS & SCS seeks a commitment to ongoing engagement from HAC to minimise construction related impacts on the school. SCS also requests that where practicable, construction be staging and scheduled to minimise impacts during term time, and that particularly disruptive works are avoided during critical school periods.

Conclusion

CAS & SCS appreciates the opportunity to provide comment to the Department on this proposal. CAS, the Parish, SCS and LSCC acknowledge the importance of this important health infrastructure investment for the community. However, it is important that the development should not occur to the detriment of the effective operation of an established educational facility, or compromise student safety and wellbeing.

SCS respectfully requests that the issues of access, traffic generation and amenity raised in this submission are addressed to ensure that the safety, amenity and operational needs of the adjoining LSCC are adequately protected.

Yours sincerely,



Glenn McLachlan
Director Finance & Property