

16 December 2014

Mr Ben Lusher
A/Director, Industry and Key Sites
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Our Ref: 2013/383353

Attention: Megan Fu


Dear Sir,

Submission on the Stage 2 EIS for the Northern Beaches Hospital (SSI 6792)

I refer to your letter dated 14 November 2014, which advised of the exhibition of the Stage 2 Environmental Impact Statement (EIS) for the Northern Beaches Hospital project. Council staff have undertaken a review of the relevant documentation and Council's submission is attached for your consideration.

If there are any questions, or you need clarification on any issues, please do not hesitate to contact Phil Jemison, Principal Planner on (02) 9942 2170.

Yours faithfully



Malcolm Ryan
Deputy General Manager Environment



Warringah Council Submission



Stage 2 Environmental Impact Statement State Significant Infrastructure (SSI 6792) Northern Beaches Hospital

16 December 2014

Introduction

This document is Warringah Council's submission in response to the exhibition of the Stage 2 - Environmental Impact Statement (EIS) for the State Significant Infrastructure (SSI) application (SSI 6792) for the proposed Northern Beaches Hospital at Frenchs Forest

It is noted that a number of comments that were raised in Council's submission to Stage 1 have yet to be addressed (for example matters relating to heritage, & traffic and transport), and it is requested that these matters be addressed as part of the Stage 2 EIS review process.

The following comments are provided for consideration:

Comments

1. Natural Environment Comments

The following comments on Northern Beaches Hospital Stage 2 have been provided by Council's Natural Environment Unit (NEU). NEU have included comments on Biodiversity, Stormwater Quality Management and Development Engineering.

It is noted that all NEU concerns are to be assessed in consideration of all Health Infrastructure's (HI) and Roads & Maritime Service's (RMS) EIS documents (i.e. Stage 1 – RMS, Stage 2 RMS, Stage 1 HI, Stage 2 HI) to ensure a coordinated solution is developed that considers the cumulative impacts of all proposals. In this regard, Council's submission on the RMSs Stage 1 NBH Connectivity and Enhancements Works EIS has been attached to this submission for your information.

a. Biodiversity

Section 4.7 - Flora and Fauna within the EIS (Stage 2) states that:

'A flora and fauna report has been prepared and is provided in Appendix H. The report provides a review of biodiversity matters identified in stage 1 site clearance and preparatory works and provides comment on the consequences of the Stage 1 works on the development of Stage 2 NBH.'

Several biodiversity related mitigation measures (additional to offset measures) are associated with the development consent for Stage 1 and 2 (see Infrastructure Approval – conditions B6, B4, B5, B11(i), C6, C7 and C8). The report by KMA (Appendix H of the EIS, dated 7 October 2014) makes no reference to the status and compliance of these conditions and those mitigation measures specifically identified in specialist reporting. It is recommended that a more detailed review of biodiversity matters is provided including compliance and reporting associated with all mitigation measures.

The report by KMA (2014) only refers to offsets associated with the 10 hectare site at Belrose. It is understood that this is only part of the offset requirements and that resolution of offsets and biobanking credits associated with Health Infrastructure land on Aquatic Drive, remains unresolved. It is recommended that clarification is provided on the status of the remaining offsetting arrangements for the Hospital (if any), including specific reference to the land on Aquatic Drive.

Reference to the approved clearing associated with the Stage 1 Infrastructure approval (see Figure 1, Northern Beaches Hospital Services Diversion Works & Revised Biodiversity Offset Strategy) appears to be inconsistent with recent aerial imagery for the site (refer to Nearmap) illustrating the current extent of clearing for the services diversions located closest to the intersection of Wakehurst Parkway. It is unclear if further clearing in this area would be undertaken as part of Stage 2 and if the clearing is inconsistent with offsetting requirements.

Please see additional commentary under Stormwater Quantity below.

b. Stormwater Quality and Quantity Management

Appendix O - Stormwater Management Strategy and Plan

Stormwater Quality

Council supports the integrated approach to WSUD measures and the proposed use of alternative sources water for non-potable purposes.

However the stormwater quality targets do not recognise the nutrient reduction targets contained in the Northern Beaches Management Plan (1999).

Stormwater quality targets including nutrient reductions must be demonstrated through the preparation of a MUSIC Model prepared in accordance with the draft 'NSW Water Sensitive Urban Design Guidelines', unless alternative modelling parameters are justified on the basis of local studies.

Details of the modelling of those elements, parameters and assumptions used, including all data files, must be provided to Council.

Stormwater Quantity

The report does not provide an adequate level of detail in respect to post development flows and Council's onsite stormwater detention requirements to enable assessment. Updated information must be submitted to Council for review as this information has implications for the Stage 1 Road Upgrades stormwater assessments.

Specific consideration is required for the occurrence and assessment of the Coastal Upland Swamp EEC. The RMS Stage 1 Road Upgrades Biodiversity Assessment Report (Vol. 2, Table 13, pg.118) indicates that this EEC does not occur within a 10km radius of the site, however Figure 4 (pg. 23) and Figure 6 (pg.48) within the same report and Figures 9-3 of Environment Impact Statement (Vol. 1, pg. 204) contradicts this which shows the occurrence of vegetation attributed to the Coastal Upland Swamp EEC outside of the study area adjacent to the Wakehurst Parkway in the north.

According to the Table E1 of the Surface Water Management Strategy (Vol. 3, App. M, pg. E2) hydrological changes are anticipated due to redirection of flows to the western side of the Wakehurst Parkway that may impact the swamp downstream from F25 (refer Appendix A below). A reduction in flows particularly the 2 year ARI from 1.4 to 0.22 however of more concern is the potential reduction in more frequent flows (i.e. <2 year ARI) which may be supporting the swamp.

This is further supported by the Biodiversity Assessment Report (pg. 69, 70) which states:

"changes in hard surface area and potential change to groundwater recharge resulting from the Concept Proposal will indirectly impact soak and aquatic habitats for frogs and other groundwater dependant species outside or within the study area".

The EIS for RMS Stage 1 Road Upgrades assumes there will be no additional/reduced flows from the Hospital site, post development. If this conclusion changes, the assessment will need to be updated to reflect any change in hydrology and the associated impacts on downstream environments, including the identified swamp.

APPENDIX M - Integrated Water Management Plan

First Flush Devices

To avoid concentrated pollutants entering the stormwater system, first flush devices for the rainwater tanks must drain to a landscaped area and not directly to the stormwater system.

APPENDIX P - Soil and Water Management Plan

It is noted that soil and water management controls for Stage 1 have proven inadequate in recent relatively minor rain events.

The Soils and Water Management Plan (SWMP) for Stage 2 provides inadequate levels of detail.

Prior to commencement of works, a SWMP must be prepared in accordance with the “Blue Book” (Managing Urban Stormwater – Soils and Construction, 4th Edition by Landcom 2004).

The plan, including drawings, should provide specific details outlining:

- the staging of works particularly the rehabilitation and revegetation of areas,
- locations and types of erosion and sediment controls,
- refuelling areas, spill control measures and response,
- stockpile locations and controls,
- flow paths management,
- dust suppression measures,
- maintenance and inspection checklists
- entry/exit controls.

c. Development Engineering

NEU Development Engineering have reviewed the Stormwater Management Strategy and Plan prepared by Hyder Consulting and acknowledge the plan addresses Councils On Site Stormwater Detention (OSD) technical specification and Auspec One Design specification, as far as Stormwater quantity control and drainage preliminary design is concerned.

Additionally detailed design plans, hydraulic calculations and an a DRAINS OSD hydraulic model need to be provided to verify that there will be no increase in predevelopment stormwater flows and the pre-existing discharge drainage points from the site are maintained.

2. Traffic & Transport Comments

The Northern Beaches Hospital (Stage 2) SSI 6792 - Appendix F Transport Accessibility Study (Sec 1-7) has been reviewed and the following comments are provided.

Nexus

The Transport Accessibility Study does not create the nexus between the hospital and the proposed RMS improvements and Council's comments on Stage 1 EIS for Connectivity and Enhancement Works.

RMS - Stage 1 EIS Submission

Council provided comments to P&E on the Stage 1 RMS EIS in relation to pedestrian and cycle connectivity improvements. It is requested that these comments be considered as part of this submission (Stage 2 Hospital EIS). Council's Submission on the Stage 1 EIS is attached for your information.

Pedestrian Access

Page 35, paragraph 3, mentions access for pedestrians to bus stops – Figure 8-18 shows pedestrian access through the site, but fails to mention pedestrian thoroughfare along the western boundary. These routes should be well lit to ensure safety of pedestrians

3. Development Assessment Comments

The following development assessment related comments are provided for consideration:

Landscaping (Frenchs Forest Road)

The depth of landscaping within the front setback to Frenchs Forest Road needs to be confirmed as adequate (in terms of the height of native trees at maturity) for a 9 storey building fronting a secondary road, which is otherwise characterised as a bushland lined streetscape. Additional depth and density of landscaping is considered necessary.

Landscaping (Western Side Boundary with School)

The depth of landscaping within the western side boundary setback to the car park is inadequate. The side setback area to the car parking building should accommodate at least a 3 metre of landscape strip, rather than relying upon the landscape buffer on the adjoining school site.

Car park Facades

The facades of the car park building are proposed to be quite planar and continuous, clad in perforated mesh. Some concerns are raised as to the extent of use of the fine grained mesh over such a large area, particularly when viewed from Warringah Road and Frenchs Forest Road. The final selection of material (colour/texture/relief) must demonstrate an adequate level of articulation and visual interest, whilst being complementary to the surrounding bushland setting.

Illumination from Hospital Building Facades

The illumination from windows of a 9 storey building in close vicinity to nearby residential properties have the potential to cause nuisance. Therefore, the level of lighting from the facade windows needs to be minimised to avoid such impacts. External illumination of building facades should also be minimised.

Rooftop Lighting

The rooftop level car park has the opportunity to impact on the nearby residential properties through excessive illumination. In this regard, the design and intensity of illumination should be kept to a minimum and compliant with the AS 4282-1997 – Obtrusive Effects of Outdoor Lighting.

Front Setback Illumination/headlight glare/signage

The ground floor level and proposed activities within the front setback to Frenchs Forest Road (including the ambulance parking areas) have the potential to negatively impact on the night time amenity of residential properties on the northern side of the street. Therefore, further measures should be incorporated into the landscape design to minimise these effects and any future signage is to be located and designed to minimise the impacts on amenity (including compliance with SEPP 64 – Advertising and Signage).

Waste Removal Hours

The hours for waste removal should be confined to 7.00am to 7.00pm to minimise the noise impact on nearby residential properties in Frenchs Forest Road.

Delivery Hours

Similarly, deliveries by suppliers and stockists should be confined to 7.00am to 7.00pm to minimise the noise impact on nearby residential properties in Frenchs Forest Road.

Hours of Excavation and Construction

The hours of construction should be restricted to 7am to 5pm (Mon to Fri), 8am to 1pm (Sat) and no work on Sundays and Public Holidays. Excavation should be restricted to 8am to 5pm (Mon to Fri, so no excavation on weekends).

Staff Car parking

The proposal to charge staff to park in the onsite car park building will result in problems with staff parking in nearby residential streets. This issue needs to be addressed by the traffic consultant with a view to avoiding such a loss of amenity and kerbside parking availability for residents.

Motorcycle Parking

An adequate number of motorcycle spaces are to be included in the car park building.

Construction Traffic Management Plan

The parking of construction staff cars has the potential to significantly impact on the amenity of nearby residential properties. An adequate number of spaces are to be set aside onsite or other arrangements are to be made for staff to park and access the work site. Similarly, the parking of excavation and construction trucks is to be provided for in a manner (onsite or other arrangements) that does not unduly impact on nearby residential properties.

4. Historic Heritage Comments

The Northern Beaches Hospital (Stage 2) SSI 6792 - Appendix J Historic Heritage Impact Report, has been reviewed. It is noted that a new Heritage Impact Report was not submitted for this Stage 2 application. Rather the Stage 1 Historic Heritage Impact Assessment report (dated September 2012), was submitted with a covering update letter which confirmed that the recommendations made in the 2012 Report were still valid for the Stage 2 EIS.

Given that it is 2 years since this report was prepared, it contains a number of factual errors. These matters were raised in Council's previous submission on the Stage 1 EIS and it was requested that the errors be updated. This hasn't happened.

While the report correctly describes the historic context for the Hospital site and the surrounding area, it does not correctly identify the one listed heritage item in the vicinity, being the remnant fruit trees from Holland's Orchard, adjacent to Warringah Road.

Council previously advised in its submission on Stage 1, that *"These trees were originally thought to be apple trees however Council's recent Community Based Heritage Study Review has confirmed that they are actually pear trees. Also, as part of this Review, Council has resolved to extend this heritage listing to include a grove of pear trees on the Forest High School site, which were propagated from the original pear trees adjacent to Warringah Road. This proposed listing amendment is part of a current Heritage Planning Proposal which is awaiting legal drafting before being made in early 2014. The Historic Heritage Report should recognise this change in extent of the local heritage item in the vicinity"*.

The Heritage Planning Proposal was made on 30 May 2014, which amended details of this heritage listing in the vicinity of the proposed hospital. Details of the current heritage listing in the vicinity, extracted from Schedule 5 of Warringah LEP 2011, are as follows:-

Frenchs Forest	Former Holland's Orchard and Commemorative Grove	Adjacent to Warringah Road and within The Forest High School grounds, as shown on <u>Heritage Map</u>	Lot 2, DP 234702	Local	I62
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The correct heritage information should be identified and recognised.

As previously, it is noted that there may be the potential for archaeological relics to be found in those areas of the site which were previously developed. The recommendations within this Report for an Archaeological Management Strategy (AMS) are agreed to and this AMS should be adhered to during any construction phases.

It is noted that this 2012 Historic Heritage Impact Report also examined a site on Aquatic Drive which is owned by Health Infrastructure, but which is not part of the State Significant Site for the new hospital. This has no relevance to the Stage 2 application for the new Northern Beaches Hospital.

5. Aboriginal Heritage Comments

The Northern Beaches Hospital (Stage 2) SSI 6792 - Appendix K Aboriginal Heritage Impact Report, has been reviewed. It is noted that a new Aboriginal Heritage Impact Report was not submitted for this Stage 2 application. Rather the Stage 1 Aboriginal Heritage Impact Assessment report (dated September 2012), was submitted with a covering update letter which confirmed that the recommendations made in the 2012 Report were still valid for the Stage 2 EIS.

As previously, the report appears to comprehensively assess the potential for Aboriginal sites within the study area. It is noted that no sites were identified, however that there may be potential for art/engravings on the sandstone outcrops which exist on the north-east portion of the study area. These sandstone outcrops are currently obscured by vegetation, so the Recommendations within this Aboriginal Heritage report should be adhered to during construction.

It is noted that this 2012 Aboriginal Heritage Impact Report also examined a site on Aquatic Drive which is owned by Health Infrastructure, but which is not part of the State Significant Site for the new hospital. This has no relevance to the Stage 2 application for the new Northern Beaches Hospital.

On a minor matter, the Report title should be *Aboriginal Heritage Impact Report* not Aboriginal Impact Heritage Report.

6. Urban Design Comments

The Northern Beaches Hospital (Stage 2) SSI 6792 – Infrastructure Application and Environmental Impact Statement, Built form and Urban Design, has been reviewed.

It is noted a shared pedestrian and cycling path along the western boundary of the site, providing a key north-south link to the Forest High School, will be built as part of the Stage 1. More information should be provided on the safety measures to be implemented for delivery and service vehicles accessing Forest High School from the internal road network and crossing the shared pedestrian and cycling pathway.

It is also noted that end of cycling trip facilities will be provided for staff as part of the overall staff change zone in the hospital. The hospital design should also provide end of trip facilities for cyclist that are visitors. Facilities apart from bike racks and bicycle storage could include drinking fountains and bottle refill stations.

Additionally future detailed design plans on the public domain need to be developed with reference to Warringah Council Policy No. STR-PR350, Warringah Public Spaces Design Guidelines. (<http://www.warringah.nsw.gov.au/sites/default/files/documents/policies-register/strategic-planning/warringah-design-guidelines-policy/public-spaces-guidelines.pdf>) The Design Guidelines serve as an operational tool to ensure high quality finishes and uniform standards of streetscape treatments throughout Warringah. The guidelines apply to all areas within the Warringah Local Government Area to achieve a co-ordinated and consistent palette of materials and long-term maintenance benefits.



19 November 2014

Mr Glenn Snow
Team Leader – Roads & Infrastructure
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Our Ref: 2014/327318

Attention: Justin Woodhouse

Dear Glenn,

**Re: Submission on the Stage 1 EIS for the Northern Beaches Hospital
Connectivity & Enhancement Works – Concept Proposal & Stage 1 (SSI-6434)**

I refer to your letter (dated 20 October 2014), which advised of the exhibition of the Stage 1 EIS for the Northern Beaches Hospital Connectivity & Enhancement Works – Concept Proposal & Stage 1 (SSI-6434).

Council staff have undertaken a review of the relevant documentation and Council's submission is attached for your consideration.

If there are any questions, or you need clarification on any issues, please do not hesitate to contact Phil Jemison, Principal Planner on (02) 9942 2170.

Yours faithfully

Malcolm Ryan
Deputy General Manager Environment

WARRINGAH COUNCIL

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Roads & Traffic Comments

Introduction

A number of differences have been identified in the proposed design between that shown in the Urban Design Report and the main EIS report. These differences need to be clarified as some aspects of the designs shown in the documents are not agreed to by council and need to be addressed. This list has been compiled from a review to date and may be added to as further reviews are carried out. Some of the matters identified include:

Frenchs Forest Road/Rabbett Street/Naree Road – The Urban Design report and Section 5.2.3 of the EIS provides pedestrian crossings on three legs of the intersection. Figure 5.1 of the EIS provides pedestrian crossings on only two legs of the intersection. It is considered that pedestrian crossing facilities should be provided on all legs of this signalised intersection, to comply with RMS guidelines.

Frenchs Forest Road East – the Urban Design report provides for a marked foot crossing of Frenchs Forest Road, between Nandi Avenue and Romford Road intersections. This would not comply with RMS Technical Directions as there are two lanes of travel in each direction.

Frenchs Forest Road East/Warringah Road – The Urban Design report does not provide this as a signalised intersection and with a marked pedestrian crossing away from the intersection. There would be safety concerns with this arrangement for pedestrians. The EIS provides this as a signalised left turn for eastbound vehicles, with a pedestrian crossing provided at the intersection. This is the preferred operation of the intersection.

Frenchs Forest Road/Wakehurst Parkway – The Urban Design provides pedestrian crossings on three legs of the intersection. The EIS provides crossings on all four legs of the intersection. It is considered that the crossings should be provided on all legs of the intersection. This also relates to council's comment below regarding the continuation of the pedestrian path on the northern side of Frenchs Forest Road.

Allambie Road, north of Warringah Road – The Urban Design indicates the retention of the bus stops on both sides of Allambie Road. The EIS plans provide that these bus stops will be removed. What is planned for the bus stops in this area.

Allambie Road/Warringah Road – the Urban Design report appears to recommend that a pedestrian crossing also be retained across Allambie Road south at the intersection whereas the EIS does not provide for this. The retention of this crossing is considered a safer option as there are no other crossing facilities provided on Allambie Road south of Warringah Road.

Frenchs Forest Road West – The Urban Design report indicates that the footpath on the northern side of Frenchs Forest Road West will be terminated approximately 40m west of the Wakehurst Parkway. The EIS provides that the path will continue to Wakehurst Parkway. Council considers that the pathway should continue to Wakehurst Parkway as terminating the path in this location is unsafe. This area is also a



connection to a walking track that runs North / South on the West side of Wakehurst Parkway.

Modelling

The traffic modelling highlighted that the intersection of Forest Way and Adams Road was operating with a poor LOS (p.124 & 130) however, it is not proposed to undertake any works at the intersection, whether as part of the hospital works or as network enhancement works, to improve the LOS at this location. One of the major impacts on the operation of the intersection is the lack of a right turn bay (northbound) for Forest Way.

The EIS highlights that there will be some improvement to the operation of the Warringah Road/Forest Way intersection in 2018. The improved Level of Service (LOS) of the intersection of Warringah Road/Forest Way is welcome however, the continued poor performance of the Forest Way/Adams Street intersection identifies that some works are required at this intersection, specifically the provision of right turn bays to ensure to a greater degree that, three through lanes of traffic are available on Forest Way and the increased potential for crashes as vehicles change lanes to get around a right turning vehicle. In addition a two lane approach on Adams Street (east) to the intersection should be considered.

Cycle Connectivity

The need for cycle connections to be provided to the hospital from the surrounding cycle network is an important consideration. This section highlights that the proposed 3.5 m path on the southern side of Frenchs Forest Road West would not be provided as a shared path along its entire length, due to the grades of 12-15% near the intersection with Wakehurst Parkway. This highlights the need to provide a shared path along the northern side of Warringah Road, where the grades are suitable along the entire length for a shared path provision. This could be provided in the section west of Wakehurst Parkway (along the frontage of the NBH) to Forest Way with the connections provided to Frenchs Forest Road East and the off-road shared path on Warringah Road east of Wakehurst Parkway.

It is also considered that a link should be provided on Rodborough Road between the Allambie Road roundabout and the proposed pathway along the southern side of Warringah Road, and on the western side of Allambie Road, north of Aquatic Drive.

It is acknowledged that the shared paths throughout the precinct would be provided at 2.5m in width. It is considered that in those areas where pedestrian activity is higher, such as around the Forestway Shopping Centre or any of the bus stops, that there should be a transition to a wider path area to ensure the safe passage of cyclists and pedestrians.

There does not appear to be any continuation of cycle facilities on Wakehurst Parkway from north of Frenchs Forest Road to Warringah Road. This would require cyclists to mix with general traffic and increase the potential for conflict and crashes. It is understood that, through meetings with RMS, a shared path will be provided on the



eastern side of Wakehurst Parkway between Warringah Road and Aquatic Drive. Further details are required regarding this area.

The passage of cyclists northbound on Allambie Road to Patanga Road with the proposed changed intersection configuration at Frenchs Forest Road needs to be addressed as this is not clear from the documentation provided.

The section of Forest Way, south of Naree Avenue does not provide any cycle facilities at the present time. This section of Forest Way has been identified for investigations as part of Stage 1 and also in Stage 2 near the intersection with Warringah Road. This section provides an important connection in the cycle network and it is imperative that a suitable and safe facility is provided.

The provision of overhead bridges should also cater for cyclists.

Pedestrian Connectivity

As highlighted in Council's submission on the Draft SEAR's, it is imperative that direct accessible pedestrian routes link the NBH to the public transport system and local attractors such as the Forestway Shopping Centre and transport node in Forest Way at this location.

These pedestrian facilities need to cater for people with disabilities and the aged, as well as the general public. This also relates to encouraging visitors, staff and those attending outpatient services at the hospital to alternative means of transport.

The provision of a pedestrian bridge across Forest Way to service the bus stops on both sides of the road and the shopping centre and linking them to the hospital is again recommended for further consideration.

The intersection of Forest Way and Russell Street requires improved facilities for pedestrians crossing Russell Avenue. Council requests RMS to consider suitable changes to the intersection through the provision of a pedestrian refuge in Russell Avenue and changes to the kerb returns to slow traffic turning left.

As highlighted in the Introduction, the discontinuation of the pedestrian path along the northern side of Frenchs Forest Road approximately 40 metres west of the intersection with Wakehurst Parkway is not supported. Pedestrians may choose to walk across eight lanes of traffic to reach the pathway on the southern side of Frenchs Forest Road. This is an unsafe situation. It is considered that the pathway should be continued to the intersection and crossings at Wakehurst Parkway shown in Figure 5.2.

This area also has a critical link on the western side of Wakehurst Parkway north of the Frenchs Forest Road intersection which connects to the pathway in Frenchs Forest Road.

Council prefers that the pathway on the northern side of Frenchs forest Road west to be located adjacent to the property boundary and 2m in width. There are safety concerns with this pathway being located adjacent to the kerb with the volume of traffic forecast to be using this section of Frenchs Forest Road.



Public Transport

As highlighted in the EIS and Transport for NSW documents, buses are the only public transport provided for the Northern Beaches area. This is of more importance with the construction of a major hospital at this location. The major transport link from the NBH to the wider transport network and destinations makes it an important aspect that, not only is the network enhanced in the short term, but that it should also consider the long term public transport requirements. In this regard it is important for RMS and Transport for NSW to consider now the reservation of future widening/transport corridors that need to be reserved to cater for the future development.

The attractiveness of public transport in the future, in order to reduce the reliance on the car, to access the hospital is an important consideration and the ability to adequately expand and/or enhance the system in the future is one of the key elements of this.

Currently there are approximately 46 scheduled route services in the AM peak two hours that operate along the section of Forest Way on the approach to the intersection of Warringah Road. School services are in addition to these. The bus stop in Forest Way at the intersection with Rabbett Street is a highly utilised stop for passengers joining these services and also interchanging between other services. This stop therefore fulfils a major role in the local and regional transport system. Consideration must be given to improving the operation and facilities at this location.

The EIS Traffic report provides for the discontinuance of some bus services and changes to other services to cater for the NBH. The removal of the route 137 service would impact on the residents of Bantry Bay who rely on bus services to access local facilities and the regional network.

The proposed changes to bus stops will require the removal or relocation of existing bus shelters. The removal of any advertising shelters represents a financial and maintenance impact for Council. Any new shelters proposed, and to be constructed as part of the Stage 1 works, should comply with council's design requirements and disability standards for accessible public transport. Any cost implications of changes to bus shelters will need to be borne by RMS.

The proposed increase in length of the northbound bus bay in Forest Way at the Forestway shopping centre should include the reconfiguration of the waiting facilities to provide for its intended purpose..

Section 7.3.2 provides for the potential relocation of school bus operations servicing the Forest High School Frenchs Forest Road to Warringah Road during the Stage 1 construction. Should this proposal be considered for further investigation then it must include the provision of an indented bus bay, in addition to the existing traffic lanes, to remove the waiting buses from a busy and congested section of road and to ensure safety for school children waiting to board buses.

Road Construction and Potential Rat Runs

While there will likely be impacts on the wider regional network during the construction phases it should be acknowledged that there will be impacts on the local road network within the proximity of the proposals. Oxford Falls Road, Morgan Road, Government



Road will all likely to incur additional traffic volumes as a result of the works being undertaken. Grace Avenue is also likely to see increased traffic volumes.

Oxford Falls Road and Morgan Road are narrow, rural type roads with poor horizontal alignments. The increased traffic along this route will lead to increased crash potential and impacts on residents. At the eastern end, where Oxford Falls Road intersects with Iris Street, an increase in traffic movements at this intersection will lead to increased delays for local residents and potential safety issues at the intersection due to restricted sight distance and drivers taking increased risks when turning at the intersection.

Similarly, Grace Avenue is a narrow residential street which is not equipped to incur the additional traffic volumes. This could be exacerbated during the construction phases of the road project.

These potential 'rat runs' will need to be monitored by RMS and council. Potential strategies and activation points should be identified to construct or manage traffic by RMS.

Car Parking

The Traffic and Transport Assessment carried out parking occupancy surveys of a number of streets within the area. While it identified that a substantial amount of weekday daytime parking occurred around Naree Road, Rabbett Street and was most likely associated with commuter parking, it indicated that the parking occupancy was manageable as the level of parking and potential availability on other side streets off Frenchs Forest Road *"there are only a handful of sections in which parking demand would need to be managed. These include Naree Road, Rabbett Street and Patanga Road."*¹

The removal of parking on Frenchs Forest West needs to be carefully considered as the adjoining side streets along this section of road are generally narrow (>7m) and extensive parking associated with the school and hospital will impact on access for residents and emergency services.

Management of the parking is required to be considered and addressed by RMS. There may be the opportunity for traffic management such as road closures at Frenchs Forest Road in order to control some of this parking. Warringah council is opposed to the imposition of permit parking schemes on the local roads surrounding the NBH as this provides a financial and administrative burden on council and does not comply with RMS mandatory guidelines. Should these matters be overcome, Council may consider this further.

The matter of car parking around the Skyline shops must consider the access between any proposed car parking and the shops. This centre attracts a substantial amount of passing trade which requires ready access and minimum time required to access the shops, purchase requirements and then proceed to other destinations. If the proposed

¹ Traffic and Transport Assessment// Issue C: p.26 (GTA Consultants 2014)



parking impacts on these aspects, then it would impact on the patronage of the shops. Currently, no solution is provided by RMS at this stage.

Land Acquisition

A process of land acquisition needs to be in place with Warringah Council and, if works are near residents, appropriate infrastructure needs to be considered to minimise the impact on residents at no cost to Council.

Classification of Roads

The EIS document indicates that RMS is not proposing to reclassify Frenchs Forest Road as a state road as traffic volumes along the road, even with the NBH, do not justify this occurring. In other parts of the document it is highlighted that Frenchs Forest Road currently carries a volume of traffic far exceeding its current role as a collector road (15-20,000 vpd).²

Warringah Council strongly objects to Frenchs Forest Road being classified as a local or Regional Road and reiterates that Frenchs Forest Road should be classified as a State Road given the existing and future traffic volumes and the configuration of the street as a four lane traffic oriented road with minimal kerbside parking and providing a key connection to employment areas and a major regional facility.

It is also understood that enhanced bus services will use Frenchs Forest Road.

Infrastructure

The transport network in the precinct does not only consist of vehicles. Cyclist, pedestrians and users of public transport are in the precinct. Often these types of major works impact on the transport system and existing infrastructure may become obsolete or new infrastructure is required. Consideration needs to be given to seating, bus stops, bus shelters and the like. These should be developed and installed to a high standard.

Signage

A wayfinding strategy and plan needs to be included in the process for motorists, pedestrians and cyclists. This strategy for directing all of the user's, needs to be clear and without a proliferation of signs in the area. This may require a review, and replacement, of existing signage in the area as well.

Traffic Management

Management issues associated with the construction phases of the project are identified above however, the following matters also need to be addressed with the operational phases of the project.

² EIS Vol. 1 p.87 – Traffic management and access - 2014



Patanga Road

The effective closure of the street at Frenchs Forest Road will have an impact on the Skyline shops (as highlighted under the Parking section), local residents and service vehicles to the surrounding area. Vehicles that enter Patanga Road will need to be able to turn around without making use of resident's driveways. This is particularly important for any trucks that might pull into the street to access the shops or Frenchs Forest Road.

The impact on the collection of domestic waste from properties located on Naree Road and Forest Way will need to be managed during the construction phases of the retaining walls along these sections of road.

Design Criteria

The EIS provides for road crossfalls of 3-6.5% and footpath crossfalls of 4%. Council's design requirements are that road crossfalls should not exceed 3% for parking or kerbside lanes and that footpath crossfalls are to be 2.5-3%.

Street Lighting

With the proposed changes and upgrading of roads there will be a requirement for street lighting to be upgraded. Council does not consider that it should be asked to fund the upgrades. The costs for this work are the responsibility of RMS.

Road Maintenance and Construction Traffic

The construction of Stage 1 road works during 2015-2017 is noted together with the need for pavement reconstruction and widening (pg77). Council has deferred pavement works in Frenchs Forest Road West pending detailed design of the road works for the hospital. The condition of Frenchs Forest Road West is deteriorating and the potential exists for accelerated wear during the hospital construction phase with the additional construction traffic. RMS should consider the existing road conditions in scheduling reconstruction works and liaise with Council to preserve road conditions in a safe and efficient manner.



Natural Environment Unit Comments

Biodiversity Assessment Report (Vol.2, App. 3) - Page 43, Table 3, Page 65 Site Value Attributes

Site values attributes recorded by plot/transect for Ecological Sampling Unit (ESU) 11 appears to be an error. According to table 3, native groundcovers were not recorded along a 50m transect within ESU 11. Table 3 also identifies that Exotic Plant Cover within ESU 11 along a 50m transect was 95% cover. Based on a site inspection by Council officers, the extent of both native groundcover and exotic species is likely to be substantially different to that appearing in Table 3. The site value score generated by the Biobanking tool for ESU 11 is therefore likely to be inaccurate.

Reference to ESU 11 on page 65 states *"Clearing from Stage 1 project is mostly within modified linear strips of roadside vegetation (ESUs 9, 10, 11, 13, 14, 15). Some clearing of hollow bearing trees may be required in these areas, but the frequently mown understorey has little value as fauna habitat, other than occasional foraging by bandicoots."* ESU 11 is not a frequently mown area.

Recommendation

That assessment data relating to ESU 11 is audited and where an error has occurred that the Biobanking assessment is amended to attribute a more accurate site value score to ESU 11. It is acknowledged this vegetation condition attributed to ESU 11 may not be a factor in determining the extent of offsets required using the Biobanking methodology.

Occurrence and Assessment of the Coastal Upland Swamp EEC

Report Reference –

Biodiversity Assessment Report (Vol.2, App. 3) Table 13 - pg. 118, Figure 4 - pg. 23), Figure 6 - pg. 48, Page 69-70

Environmental Impact Statement (Vol. 1) Figures 9-3 - pg. 204

Surface Water Management Strategy (Vol. 3, App. M) (Lyll & Associates), Table E1 - Pg. E2, App. E

The Biodiversity Assessment Report (Vol. 2, Table 13, pg.118) indicates that this EEC does not occur within a 10km radius of the site, however Figure 4 (pg. 23) and Figure 6 (pg.48) within the same report and Figures 9-3 of Environment Impact Statement (Vol. 1, pg. 204) contradicts this which shows the occurrence of vegetation attributed to the Coastal Upland Swamp EEC outside of the study area adjacent to the Wakehurst Parkway in the north.

According to the Table E1 of the Surface Water Management Strategy (Vol. 3, App. M, pg. E2) hydrological changes are anticipated due to redirection of flows to the western side of the Wakehurst Parkway that may impact the swamp downstream from F25 (refer Appendix A below). A reduction in flows particularly the 2 year ARI from 1.4 to



0.22 however of more concern is the potential reduction in more frequent flows (i.e. <2 year ARI) which may be supporting the swamp.

This is further supported by the Biodiversity Assessment Report (pg. 69, 70) which states "*changes in hard surface area and potential change to groundwater recharge resulting from the Concept Proposal will indirectly impact soak and aquatic habitats for frogs and other groundwater dependant species outside or within the study area*".

The EIS assumes there will be no additional/reduced flows from the Hospital site, post development. If this conclusion changes, the assessment will need to be updated to reflect any change in hydrology and the associated impacts on downstream environments, including the identified swamp.

Recommendation

That the potential occurrence of the Coastal Upland Swamp EEC be verified on the ground where any changes in hydrology are proposed. The study area should be extended to include areas that are potentially indirectly impacted by hydrological changes.

Assessment should be undertaken to determine the potential impact on the reduction of flows to the swamp particularly more frequent flows (i.e. <2 year ARI).

The assessment must be updated if there are any proposed changes to hydrology resultant from the Hospital site development that differ from the assumptions made in the EIS.

It is acknowledged that the report proposes further assessment of GDE's and associated sensitive receivers once the construction designs are finalised.

Biodiversity Assessment Report (Vol.2, App. 3) – Page 93

Offset Measures

It is understood that "*Establishing offset sites in consultation with OEH and Warringah Council is Roads and Maritime's first priority to achieve the objectives of the Offset Strategy provided this can be achieved within a suitable timeframe and cost.*"

Furthermore, the report acknowledges that limited consultation on offsets has been undertaken to date.

Based on the current preferred option for the Mona Vale Road Upgrade, as well as Stage 2 of the hospital road upgrades, further loss of the Duffys Forest Ecological Community and local connectivity will result from the upgrades. The cumulative loss of these three projects on this EEC and landscape connectivity is considered significant.

Recommendation

That RMS account for the cumulative impacts of all three major projects on the Duffys Forest Ecological Community and actively pursue local offsets within the Warringah LGA (firstly seeking to offset by securing other Duffys Forest sites in the LGA, and secondly other significant ecological outcomes such as connectivity and threatened



species). Where the cost of potential offsets is for the hospital connectivity upgrades is considered too great, pooling offset requirements associated with the Mona Vale Road upgrades and Stage 2 of the Hospital road upgrades should be considered where an improved outcome can be achieved.

Biodiversity Assessment Report (Vol.2, App. 3) – Page 182

Assessment of Significance – Powerful Owl

Urban Design Report and Landscape Character and Visual Impact Assessment – Page 54

The assessment of impacts on this species acknowledges the high site fidelity shown by Powerful Owls and that all large hollows would be retained. Council is aware that a known nest tree occurs in the study area immediately adjacent to the proposed works. The Urban Design Report indicates that a roost tree used by the male bird for roosting during nesting is proposed for removal. No acknowledgement of the significance or otherwise of the known nest hollow and associated roosting tree/s is included in the report. The proposed works are not considered to be consistent with the Recovery Plan for this species.

Council officers are also aware of a Powerful Owl which was hit by a car and killed in 2012 adjacent to ESU 5 on Wakehurst Parkway.

Recommendation

The Assessment of Significance for the Powerful Owl be amended to account for the known occurrence of a nest hollow within the study area. Where necessary, impact mitigation should also be amended accordingly.

Water Quality Devices

Further clarification is required regarding the maintenance responsibilities including ease of access for water quality devices PCD1 & 3 which are located on Council land, including during construction works and beyond. It is assumed PCD2 will be managed by RMS as it's on RMS land.

It is suggested additionally PCD be relocated to the end of the cu de sac in Wiinslea avenue to better improve maintenance access and additionally treat more of the surface flow from a larger upstream catchment.

Stormwater Drainage Impacts

The three stormwater designs need to be assessed in consideration of all HI and RMS EIS's (Stage 1 – RMS, Stage 2 – RMS, Stage 2 – HI) to ensure a coordinated solution is developed that considers the cumulative impacts of all proposals.

The Lyall and Associates Water management strategy demonstrates significant stormwater flow reductions to catchment 2D and specifically drainage line 2 (Trefoil Creek). The strategy assumes that the hospital site will be providing on site stormwater



detention as part of the development works to limit flows to maintain pre-development conditions.

Confirmation is to be provided that the NBH development will be providing on site stormwater detention in accordance with Councils OSD Technical specification to limit flows to state of nature conditions.



Development Assessment Comments

Development Assessment Comments on EIS for Northern Beaches Hospital Road Connectivity and Network Enhancement Project

Development Assessment raises the following points:

What system is in place for properties affected by the Stage 1 and 2 road works to get detailed timings and plans in case they are looking to develop their land through a DA or CDC?

Council considers it is essential that all DA's for properties adjoining the proposed road works be referred to the RMS for comment. How does the RMS want this to happen to avoid developments being approved that subsequently cannot be built or need major modifications due to acquisition of land or changes to roads and access driveways.

Council will be informing applicants through its Prelodgement Meeting and Duty Planning enquiries process for any future developments which may need to consider the RMS road works in their planning, design and assessment.

A detailed Construction and Traffic Management Plan should be prepared to minimise and manage disruption to surrounding residential properties and through-traffic, including noise, dust, kerbside parking, bus stops, construction traffic and staff parking and machinery/materials storage. Cumulative effects of all proposals (Stage 1 – RMS, Stage 2 – RMS, Stage 3 – HI) should be considered.

A final full list of all affected properties should be provided to Council so that a layer can be created in Council's GIS system for DA assessment and referral purposes.

The proposal to relocate the public carparking in front of the Skyline Shops is uncertain. The carparking is relied upon by the shop owners and provides parking to satisfy the carparking needs of this centre. Prior to any removal of this parking, an alternative should be found which provides for convenient parking for users of the centre and which can be relied upon legally and in perpetuity. Disabled access, loading and unloading, public domain (paving, landscaping) and waste management must also be considered in the adjustment to the road reserve in front of the shops.

The RMS should carry out a check of any existing development approvals which will be affected by the road works. In this regard, if a development consent requires certain matters to be provided (such as parking and signage) and the road works will impact on that provision, alternative arrangements may be required and may involve modifying such consents.

Consideration be given to street tree replacement in accordance with Warringah Councils requirements.

Development Assessment would like to see the following details for the Stage 2 road works.

Construction Traffic Management plans to show how the flow of through traffic can reasonably be maintained during construction to allow commuters to get to work and local residents to move around.

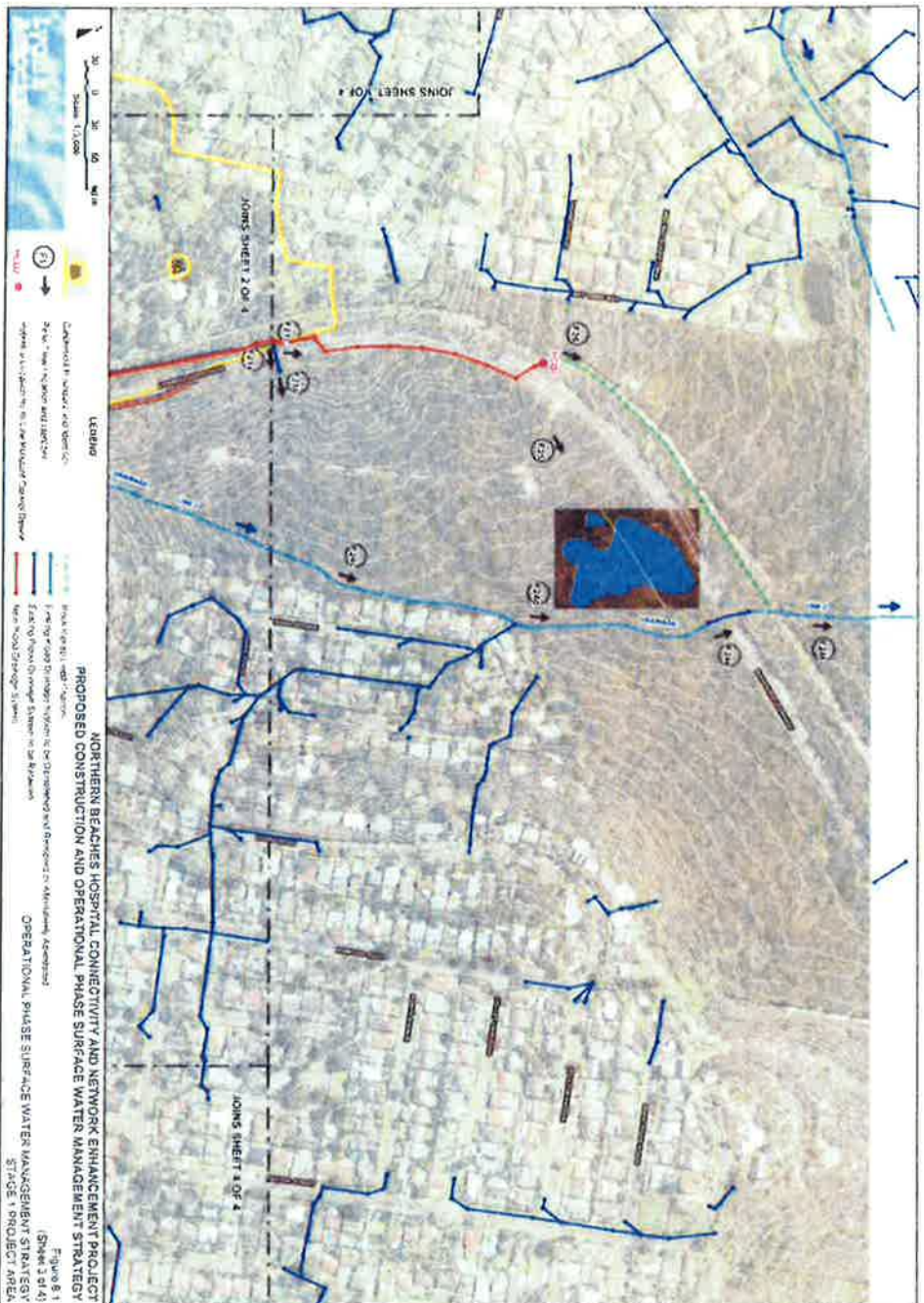


Any adjustments to footpaths and roadworks must consider vehicular access to private properties that are affected (for example Naree Street properties). In relation to driveway gradients and turning bays in front setbacks, any solution would need to comply with Councils LEP/ DCP requirements.

Notwithstanding the matters raised above, Development Assessment has no objections to the works and no further comments on the EIS.



Appendix A – Location of Coastal Upland Swamp EC in relation to F2



Addendum to Warringah Council's Submission – Additional Traffic comments

Northern Beaches Hospital EIS (Stage 2)

Roads Traffic and Waste have undertaken a review of the EIS documentation for the proposed Northern Beaches Hospital (Stage 2) including the Transport Accessibility Study (TAS) report prepared by Hyder and the plans provided.

There are a number of errors in the TAS report. These include:

1. Section 6.1 – Road Network,
 - a. Wakehurst Parkway
 - i. The report provides that Wakehurst Parkway is a 'divided road configuration with two through lanes, dual right turn lanes, and left turn slip lane in the northbound direction.' There is no part of Wakehurst Parkway in the vicinity of the NBH site that has this configuration.
 - ii. The report also provides that Wakehurst Parkway 'has a single through lane and a dedicated bus lane' in the southbound direction. While this is correct it does not include the dual right turn lane and left turn lane at the intersection with Warringah Road.
 - iii. These comments also apply to Section 3.1 of the Construction Management Plan.
 - b. Forest Way.
 - i. The report provides the name of the road as 'Forest Way Road'.
 - ii. It indicates that Forest Way is a local road, when it is a State Road under the care and management of RMS.
 - iii. It provides that the Forest Way configuration is as an 'undivided road with three lanes per direction' which is incorrect in that it is a divided road for its entire length between Warringah Road and Mona Vale Road.
 - iv. The speed limit of Forest Way is shown as 50km/h. The road has a posted speed limit of 70km/h on the southern section and 80km/h north of Hews Parade/Parentie Street.
 - v. Comments ii, iii & iv also apply to Section 3.1 of the Construction Management Plan.
2. Section 7 – Connectivity Enhancement Works
 - a. Last paragraph shows Forest Way as 'Forset Way'
3. Section 9 – Traffic Generation, Traffic Impact Assessment
 - a. On p.44 under 'Stage 1 Hospital Connectivity Works, fourth dot point has Patanga Road as 'Patonga Road'.



The following matters are raised regarding aspects of the report and potential 'conditions' that will need to be satisfied for the development

4. Section 6.2 – Road Network Performance

a. Intersection Performance (Table 6-4 & 6-5)

- i. These tables indicate that the existing (2012) Level of Service (LoS) for Forest Way South approach to the intersection of Forest Way/Naree Road is LoS 'F' with an average vehicle delay of more than 200 seconds for both the AM and PM peak periods. It is difficult to understand how an approach which has priority as the main traffic flow can have more delay than the minor road which is terminating and vehicles trying to exit onto a main traffic thoroughfare.

b. Key intersections

- i. As over 40% of the traffic (the highest individual proportion) for the NBH is anticipated to approach from, and depart toward, the east (Figure 9-22, p.42) then the intersections of Warringah Road/Allambie Road and Allambie Road/Frenchs Forest Road/Patanga Road should be included as key intersections.

The right turn movement from Warringah Road into Allambie Road (north) is already operating at capacity and how this increased traffic is to be managed is an important consideration in access to the hospital.

Is there any consideration to allow the right turn from Warringah Road into the hospital at the Hilmer Street intersection as part of the Stage 2 roadworks on Warringah Road.

5. Proposed Car park layout

- a. There is no data provided on total staff numbers for the hospital in the Accessibility Report. Confirmation is required that the proposed staff parking provision is adequate to allow for the increased parking at shift change times.
- b. It appears that speed humps are proposed to be provided on each aisle of the car park. While some of the speed humps are located on the approach to the pedestrian crossings within the car park, others are proposed on the departure side of the crossings. All of the proposed speed humps should be located on the approach to the pedestrian crossings within the car park and should comply with Austroads standards.
- c. Is the length of the exit road from the car park exit to the traffic signals at Frenchs Forest Road sufficient to allow for weaving manoeuvres for vehicles wishing to turn left or right at the traffic signals.
- d. The lane allocation for this exit road will need to be determined. From the report (Figure 9-23) it appears that right turning traffic is double the volume turning left onto Frenchs Forest Road.

6. Loading Dock / Service Vehicle Access



- a. Has consideration been given to service vehicles that arrive from the west and then need to return to the west on departure? Service vehicles are restricted to exiting the site onto Warringah Road which will allow only travel toward the east. Frenchs Forest Road currently has a 3 tonne Load limit in place so heavy vehicles will not be able to return that way.

A service vehicle traffic management plan is required to be provided. This plan should identify the routes proposed from each direction for vehicles approaching and departing the site.

- b. The exit of the loading dock ramp onto South Road may create sight distance issues between exiting trucks and any vehicles travelling west on South Road and the pedestrian crossing located at this point. The priority at this intersection needs to be clearly defined to reduce the potential conflict points.

7. Bus stop – Warringah Road

- a. This bus stop should be provided in an indented bay as an extension of the deceleration lane for the entry to the hospital precinct.

8. Ambulance Bay, Internal Entry/Exit

- a. Ambulances entering or exiting the Ambulance bay area should be provided priority over other traffic on the circulation road. Particularly for the conflict point at the eastern end of the Ambulance Access with vehicles travelling along the circulation road from the eastern car park area.

9. Other

- a. The short access road along the southern side of the hospital building from the Transit vehicle parking does not provide any area to turn around for any vehicle accessing this area. This would require vehicles to either reverse in or out of this section of road, across the main pedestrian path from the front entrance of the hospital to Warringah Road and the bus stop. This is an unsafe situation.

b. Car Park

i. Staff parking:

It is understood that the car parking will be provided on a fee basis for both staff and visitors. This is unacceptable to Warringah Council on the basis that the potential cost to staff, particularly those who are employed full time within the hospital, will mean that many of them will choose to park in the surrounding residential streets. This places an additional burden on Council and the residents of these streets. Many of these streets are narrow and are not designed to accommodate this level of parking on a day to day basis. It is Council's position that staff parking should be provided on-site at no charge.

Justification is required to the proposal to charge for parking at all. It should only be used as a parking management tool in order to improve turnover of parking spaces in a high usage area.

ii. Public parking:

Similarly, the potential parking demand by visitors to the hospital



and the cost of paying for parking will mean that many of these visitors will choose to park in nearby residential streets so as to avoid parking charges for parking for less than two hours. It is considered that if it is necessary to charge for parking that it be provided on the basis that charges are incurred for periods longer than three hours.

10. Construction Traffic Management

- a. The Construction Traffic Management Plan should include a heavy vehicle management plan which identifies how heavy vehicles are to approach and depart the site from each direction.
- b. The Preliminary Construction Traffic Management Plan refers to the use of car pooling and shuttle buses as means to mitigate need for onsite parking however no mention is made of how and where shuttle buses will operate from, eg council car parking or other depots. Further operating details of proposed shuttle bus service are required.