

25 August 2022

Ms Kavana Ramachandra
Planning Officer
Department of Planning and Environment
4 Parramatta Square
Parramatta NSW 2150

Planning Proposal:
122-130 Pyrmont Bridge Road and 206 Parramatta Road, Annandale

Dear Mr Ramachandra

This letter refers to your request for a response to submissions to address issues raised in response to the exhibition of the planning proposal for 122-130 Pyrmont Bridge Road and 206 Parramatta Road, Annandale (PP-2021-5718), including from:

- Inner West Council
- Transport for NSW
- Greater Cities Commission
- NSW Health
- Sydney Airport.

The issues raised have been addressed in the attached documents:

- Response to submissions table prepared by FPD Planning (Attachment A)
- Response to traffic and transport issues prepared by Stantec (Attachment B).

It is considered that all issues raised have been addressed and that it is now appropriate for the Planning Proposal to progress to finalisation.

The proposal directly aligns with the relevant strategic context which applies to this area including being entirely consistent with the recommendations of Parramatta Road Corridor Urban Transformation Strategy and in direct alignment with the vision for the Tech Central innovation precinct and the Camperdown-Ultimo Collaboration Area, as defined by the Place Strategy.

It is appropriate that the planning for this site proceeds ahead of the planning for the wider precinct given that the proposal has addressed all aspects of the site specific and strategic context, which will also need to be addressed for the wider precinct.

We also reiterate our view that the Council proposed site-specific provisions are unnecessarily complicated and inconsistent with the relevant policy context and Section 9.1 Ministerial Directions and has potential to be overly restrictive in terms of innovation and employment and accommodating a variety of uses which would support the wider health and education precinct.

The introduction of a site specific control is also entirely contrary to the intent of the Standard LEP which apply a standardised approach to planning instruments in NSW and the employment zones review which seeks to provide greater flexibility within employment zones.

Please contact me if you require any further clarification on this response to submissions.

Thank you for your ongoing support in progressing this application.

Regards,

A handwritten signature in black ink, appearing to read 'Anna Johnston', with a stylized flourish at the end.

Anna Johnston

Associate

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122-130 Pyrmont Bridge Road and 206 Parramatta Road, Annandale

Planning Proposal – response to submissions

Issue raised	Response
Greater Cities Commission	
<p>GCC supports the Planning Proposal to rezone the subject land from IN2 to an appropriate Standard Instrument Zone under condition that it would facilitate delivery of the objectives of the Camperdown-Ultimo Collaboration Area Place Strategy and the Tech Central innovation district (the Camperdown-Ultimo Collaboration Area is now known as Tech Central). The vision for Tech Central is for it to become Australia's innovation and technology capital. As stated in the Camperdown-Ultimo Collaboration Area Place Strategy, Tech Central's specialisations include: biomedical, clinical and population research, biotechnology industry clusters, health sciences, public health and medical services, sustainable technologies, smart utility solutions and arts and creative industry.</p>	<p>Noted. The proposal will support a range of uses as envisaged by the State government endorsed strategies including the Tech Central innovation precinct, the Camperdown-Ultimo Collaboration Area (as defined by the Place Strategy) and the Parramatta Road Urban Corridor Transformation Strategy.</p>
<p>GCC supports provision of site specific planning controls in Council's planning instrument that would ensure development of specific land uses for medical innovation, research, technology and health services, creative uses and the inclusion of a percentage of permissible gross floor area for retail uses that would activate the street frontages (along Parramatta and Pyrmont Bridge Road) consistent with PRCUTS map for Active and Commercial Frontages. It is important to protect this area from residential or unrelated commercial land uses.</p>	<p>Ministerial Direction 9.1(2) March 2022, focus area 1.4 states (bold added): <i>"The objective of this direction is to discourage unnecessarily restrictive site specific planning controls"</i> And goes on to state: <i>"A planning proposal that will amend another environmental planning instrument in order to allow particular development to be carried out must either:</i> <i>(a) allow that land use to be carried out in the zone the land is situated on, or</i> <i>(b) rezone the site to an existing zone already in the environmental planning instrument that allows that land use without imposing any development standards or requirements in addition to those already contained in that zone, or</i> <i>(c) allow that land use on the relevant land without imposing any development standards or requirements in addition to those already contained in the principal environmental planning instrument being amended.</i></p> <p>As outlined in the submission prepared on behalf of the applicant, the Council proposed site-specific provisions are unnecessarily complicated and inconsistent with the relevant policy context and Section 9.1 Ministerial Directions and has potential to be overly restrictive in terms of innovation and employment and accommodating a variety of uses</p>

Issue raised	Response
	<p>which would support the wider health and education precinct.</p> <p>The introduction of a site specific control is also entirely contrary to the intent of the Standard LEP which apply a standardised approach to planning instruments in NSW and the employment zones review which seeks to provide greater flexibility within employment zones.</p> <p>Ministerial Direction 9.1(2) focus area 1.5 states that:</p> <p><i>(1) A planning proposal that applies to land in the nominated local government areas within the Parramatta Road Corridor must:</i></p> <p><i>(c) be consistent with the Parramatta Road Corridor Planning and Design Guidelines (November, 2016),</i></p> <p>The PRCUTS Planning and Design Guidelines prescribe B5 Business Development zoning for the subject site, notably without any further site specific restrictions.</p>
<p>The GCC notes that a Structure Plan is currently being prepared for the Camperdown neighbourhood of the Tech Central innovation district which encompasses the site and its surrounds (see Figure 1). This work is being led by Inner West Council with co-funding from the GCC and a number of other partners. The intention of this work is to ultimately inform amendments to planning controls for the area through a wholistic, whole of neighbourhood approach. This approach aims to facilitate development of the area in a way that best supports the innovation ecosystem. There is therefore a noted risk that updates to the planning controls for this site may not align with the recommendations from the work once finalised.</p>	<p>The Proposal has undergone almost 18 months of consultation with Council, DPE and various relevant authorities, where considerations for the Camperdown strategic planning were made by Council.</p> <p>The Planning Proposal is consistent with PRCUTS, the Camperdown Ultimo Place Strategy and the vision for Tech Central and has demonstrated Strategic and Site Specific Merit. Planning for the wider precinct will also need to address consistency with the strategic and local context. Accordingly, it is appropriate that this Planning Proposal is finalised ahead of this wider planning for the precinct.</p>
NSW Health	
<p>Implications for Sydney Local Health District Services more information as to the scope and volume of services to be provided is required given the potential implications of a new Health Service on this site for transfers / referrals to other health services in the area</p>	<p>The Planning Proposal establishes the key parameters of the permissible land uses and built form. The detailed mix of health services is a matter to be determined at DA stage. The approach to defining detail uses and mix will be informed by detailed market research and needs analysis to ensure the services offered are sought after and to the extent possible, complementary to those services already available in the area.</p>
<p>Implications for Tech Central</p> <ul style="list-style-type: none"> The Sydney Local Health District supports a rezoning proposal that aligns with the principles for the Tech Central Precinct vision of health research, innovation, technology and education. 	<p>The proposal is directly consistent with the vision for Tech Central as it will support new jobs with potential to accommodate health, education and research facilities.</p>

Issue raised	Response
<ul style="list-style-type: none"> The Sydney Local District does not support a rezoning proposal that potentially impacts future land use and the activation of the Tech Central Precinct. The Tech Central Precinct has been identified by the NSW Government as one of five NSW Lighthouse precincts that will generate jobs, host globally significant firms, education and research facilities, build desirable neighbourhoods that draws investment and delivers significant economic benefit to NSW. 	
<p>Suggestions for improving pedestrian safety/access:</p> <ul style="list-style-type: none"> Continuous footpath treatment or pedestrian crossing at Parramatta Rd/Mathieson St Intersection continuous footpath treatment at Cahill Ln/Mathieson St and Cahill St/Mathieson St intersections. Design speed of Cahill St and Mathieson St 20km/h More detail is required about the proposed pedestrian/bicycle "shareway" on Mathieson St. Please refer to Transport for NSW Cycleway Design Toolbox. 	<p>Addressed in traffic response.</p>
<h3>Sydney Airport</h3>	
<p>Building height</p> <ul style="list-style-type: none"> This location lies within an area defined in schedules of the Civil Aviation (Buildings Control) Regulations which limit the height of structures to 45.72 metres above existing ground height (AEGH) without prior approval of the Civil Aviation Safety Authority. The Sydney Airport Obstacle Limitation Surface (OLS) over the site starts at approx. 80m AHD. Any proposed buildings or structures taller than 80m AHD would be subject to s.183 Airports Act Notification of decision under Reg 15A (2) of the Airports (Protection of Airspace) Reg's 1996 Construction cranes may be required to operate at a height significantly higher than that of the proposed development and consequently, may not be approved under the Airports (Protection of Airspace) Regulations. Sydney Airport advises that approval to operate construction equipment (ie cranes) should be obtained prior to any commitment to construct. 	<p>Noted and compliance achievable. This will be addressed at DA stage.</p>
<p>Aircraft noise: Current planning provisions (s.117 Direction 3.5 NSW Environmental Planning and Assessment Act 1979) for the assessment of aircraft noise for certain land uses are based on the Australian Noise Exposure Forecast (ANEF). The current ANEF for which Council may use as the land use planning tool for Sydney Airport was endorsed by Airservices in December 2012 (Sydney Airport 2033 ANEF).</p>	<p>The Planning Proposal addressed aircraft noise. This will be further addressed at DA stage.</p>

Issue raised	Response
Inner West Council	
<p>Council structure plan and Precinct LEP</p> <p>The location of the site, and its positioning as the first redevelopment in defining the western gateway to the Tech Central precinct requires:</p> <ul style="list-style-type: none"> • assurance that the site will be redeveloped for health and education uses aligned with State and Local Government's Strategic aspirations; • excellence in terms of architectural and urban design qualities to ensure the proposed built form is consistent with the desired future character of the locality; and • delivery of high quality public domain and sustainability outcomes to support the future users. 	<p>The proposal directly aligns with the recommendations of PRCUTS and would support the establishment of Tech Central by accommodating a range of employment uses which will also support the establishment of a Biomedical hub as envisaged by the Camperdown Place Strategy.</p> <p>High quality design, public domain benefits and sustainability outcomes have been addressed through consultation with Council, including Council commissioned urban design peer review. The outcomes of this consultation have incorporated in the Planning Proposal and will be further detailed at DA stage.</p>
<p>Employment Zones review-</p> <p>Camperdown has been excluded from the Employment Zones Reforms which translate existing Business Zones to Employment Zones through a self-repealing SEPP to allow for the Camperdown Structure Plan to be completed.</p> <p>Given this exclusion it will not be practical to transition this one site in the precinct to B5 or E3 Zone whilst the remainder of the precinct continues to be IN2 Light Industrial until the completion of precinct plan. Council is also uncertain whether it would be legally permissible to rezone this site to B5 Business Development if Employment Zone Reforms are finalised prior to the finalisation of this LEP Amendment.</p> <p>This is to enable further strategic planning. In this regard Council recommends the following:</p> <ul style="list-style-type: none"> • Defer the consideration of this Planning Proposal until Camperdown Structure Plan is complete, as this will inform the most appropriate and consistent land use zoning for the site and the wider Camperdown precinct; or • Retain the existing IN2 Light Industrial zone and allow additional permissible uses under Schedule 1 to align with the proposed B5 Business Development zone. This would be complemented by the proposed additional local provision with: <ul style="list-style-type: none"> • limited retail premises on the ground floor as an additional permitted use; • 75% of the floorspace as uses associated with health, education, research, technology and creative uses; • prohibit student accommodation, and tourist and visitor accommodation including hotel and motel accommodation. 	<p>As this area has been deferred from the employment zones reform it would be most appropriate to apply the B5 Zone as prescribed in the PRCUTS for this site in the short term.</p> <p>There is no issue with rezoning this site whilst the surrounding sites remain as IN2 as the permissible uses within the B5 zone are compatible with the IN2 zone and the existing uses in this area.</p> <p>If the new employment zones are updated as part of the consideration of the wider precinct, the appropriate zone could be applied at that time.</p> <p>As outlined in the submission prepared on behalf of the applicant, the Council proposed site-specific provision is unnecessarily complicated and inconsistent with the relevant policy context and Section 9.1 Ministerial Directions and has potential to be overly restrictive in terms of innovation and employment and accommodating a variety of uses which would support the wider health and education precinct.</p>

Issue raised	Response
<p>Subject to the resolution of the above land use zoning issue, Council strongly supports the proposed additional local provision as in the exhibited Planning Proposal.</p>	
<p>Site specific DCP/Planning Agreement Council strongly urges DPE as the Local Plan Making Authority to consider delaying the date when this LEP amendment comes into effect to allow sufficient time to address local infrastructure matters and include an LEP clause that prevents the determination of a development application on the site until a site-specific DCP is in place. This is critical to ensuring that this Gateway site in the Camperdown health and education precinct sets a good precedent for future developments with respect to built form and public domain outcomes.</p> <p>In addition, the LEP clause should outline the matters of consideration for the DCP such as bulk and scale, amenity, traffic, public domain, access, and environmental performance.</p>	<p>The applicant has been working with Council to prepare a Planning Agreement and site specific development controls and is willing to work with council in an expeditious manner to finalize these documents.</p>
<p>Built form and urban design The proposed built form should consider:</p> <ul style="list-style-type: none"> • All recommendations as outlined in Design Inc's urban design peer review report dated September 2021 • Greater setbacks particularly on the upper levels to reduce overshadowing impacts • Appropriate separation distances and building treatments to not preclude redevelopment potential of adjacent sites • Appropriate active ground floor interface along Pymont Bridge Road whilst being responsive to flooding issues. 	<p>The key recommendations of Council commissioned Urban Design Peer Review (prepared by Design Inc) have been incorporated into the proposal.</p> <p>Provisions in the Leichhard DCP relating to solar access to surrounding development would apply to future development on the site.</p> <p>The site is above the 1:100 year flood planning level, hence a flood study was not required as part of the Proposal.</p>
<p>Public domain The current design scheme as per the public exhibition of this Planning Proposal raises safety concerns regarding potential conflict between cyclists, pedestrians, and cars/service vehicles due to the proposed vehicular access via Pymont Bridge Road. In implementation of PRCUTS Urban Amenity Improvement Plan (UAIP), Council has developed the Pymont Bridge Road Masterplan (80% Detailed Design) to provide a new cycling link along Pymont Bridge Road. The proposed access via Pymont Bridge Road should be restricted or adequately managed through limited access as it is envisaged to be a high street with high levels of pedestrian and cyclist traffic flow.</p> <p>The proposal requires further traffic and access modelling and redesign, to ascertain how vehicle access can be best accommodated for the site, in accordance with TfNSW requirements.</p>	<p>Addressed in separate traffic response.</p>

Issue raised	Response
<p>This proposal has the potential to contribute towards following public domain works:</p> <ul style="list-style-type: none"> • Provide a minimum of 6m setback and land dedication along the Mathieson Street frontage; • Create a new “Shared zone” along Mathieson Street between Cahill Street and Parramatta Road to engender a sense of a larger and enhanced space for cyclists, pedestrians, and vehicles. This will link to Council's proposed Shared Zone along Cahill Street/Lane as well as provide part of the PRCUTS desired pedestrian and cycling link to the Johnstons Creek corridor; • Provide at least 1.5m ground floor and first floor setback along Pymont Bridge Road to facilitate footpath widening and landscaping; and • Refine the built form at the intersection Mathieson Street, Parramatta Road and Pymont Bridge Road to allow a sufficient setback and sight lines for cyclists to round the corner to the Pymont Bridge Road cycleway safely. <p>Council will ensure the above requirements are incorporated into a Council site-specific DCP relating to this Planning Proposal, however it is then imperative that Council's site specific DCP is both reported to Council for consideration, publicly exhibited and adopted prior to development proceeding on the site as also noted in the above recommendations.</p>	<p>These requirements form part of the planning proposal.</p> <p>The need to refine the built form to ensure sight lines for cyclists can be addressed at the DA stage.</p>

24 August 2022

Project/File: 300303641

MHA PBR Annandale Pty Ltd
c/- PWD Corporation Pty Ltd
Level 24, Governor Macquarie Tower
1 Farrer Place
SYDNEY NSW 2000

Attention: Rob Thomas

Dear Rob,

Reference: 122-130 Pyrmont Bridge Road and 206 Parramatta Road, Camperdown

This letter has been prepared in response to stakeholder submissions seeking further information in relation to the proposed health care building at 122-130 Pyrmont Bridge Road and 206 Parramatta Road, Camperdown. This letter should be read in conjunction with the Transport Site Assessment prepared by Stantec dated 10 March 2022¹.

Correspondence received includes the following:

- Transport for New South Wales (TfNSW) letter to Department of Planning and Environment, dated 15 July 2022²
- Inner West Council (Council) letter to NSW Department of Planning and Environment, dated 29 July 2022³
- Sydney Local Health District letter to Department of Planning and Environment, dated 25 July 2022⁴.

As part of the response to submissions process, the project team has proactively responded to a range of queries of which transport and parking is a key component. As a result, this response considers information that will form part of the broader response to submissions.

The queries raised in the correspondence listed above are noted in grey text below, with the response to each immediately following in black text.

Transport for NSW letter dated 15 July 2022

1. Proposed vehicular access from Pyrmont Bridge Road

The 'Additional Advice' – Traffic Engineering prepared by Stantec stated "Early TfNSW engagement has indicated broad support for left-in/ left-out access on Pyrmont Bridge Road". It is understood that the meeting held with TfNSW on 14 September 2021 was regarding a preliminary Development Application and that the Strategic Land Use Planning team was not involved. As such, the comments

¹ 122 - 130 Pyrmont Bridge Road and 206 Parramatta Road, Annandale – Site Assessment, Stantec, 10 March 2022

² Planning Proposal – 122-130 Pyrmont Bridge Road & 206 Parramatta Road, Annandale letter from Carina Gregory (Senior Manager Strategic Land Use Planning, Greater Sydney Division), Transport for New South Wales, 15 July 2022

³ Public Exhibition of Planning Proposal for 122-130 Pyrmont Bridge Road and 206 Parramatta Road, Annandale letter from Daniel East (Strategic Planning Manager), Inner West Council, 29 July 2022

⁴ 122-130 Pyrmont Bridge Road & 206 Parramatta Road, Annandale, number PP-2021-5718 letter from Dr Teresa Anderson AM (Chief Executive), 25 July 2022

Reference: 122 - 130 Pyrmont Bridge Road and 206 Parramatta Road

we provide in this letter apply to this submitted Planning Proposal which has yet to be finalised. It is appropriate that the matters of a preliminary Development Application should be considered separately.

TfNSW raises safety concerns of potential conflict between pedestrians, cyclists and cars due to the proposed vehicular access from Pyrmont Bridge Road in light of the proposed concept plan for public domain and cycling connection improvements.

Pyrmont Bridge Road is identified as a classified road. Additionally, this road between Parramatta Road and Mallet Street, is envisaged to provide an opportunity for active frontages and support high pedestrian activity to support the implementation of a health and education precinct in Camperdown as identified in PRCUTS and CUPS.

TfNSW advises that current practice is to limit the number of vehicular conflict points along classified roads which is reflected in Section 6.2.1 of TfNSW current publication of the 'Guide to Traffic Generating Developments 2002' and states 'access across the boundary with a major road is to be avoided wherever possible'

TfNSW suggested the following options for consideration:

a) To support the future vision along Pyrmont Bridge Road, TfNSW strongly recommends future vehicular access to be obtained from the available local road network (i.e. Cahill Street) and to consider future egress from Gordon Street. TfNSW generally would not support retaining existing vehicular access from Pyrmont Bridge Road as part of any future development application(s) if access from the local road network is available.

b) Should vehicular access be sought from Pyrmont Bridge Road. The applicant is required to demonstrate why the local road network cannot service access to and from the site, in consideration of Clause 2.119 of the State Environmental Planning Policy (SEPP) (Transport and Infrastructure 2021), previously known as Clause 101 of the Infrastructure SEPP.

Response:

Maintaining vehicle access via Pyrmont Bridge Road is key to the proposal and local area amenity generally. In the event that access is limited to local roads only, vehicles would be required to use a combination of Gordon Street, Water Street and Mathieson Street on approach and departure. This would present significant challenges due to the existing local road characteristics, narrow widths, existing building improvements (many with zero setbacks), other property boundaries and local area constraints generally.

Gordon Street is a two-way road with an approximate 5.5m width, with no parking permitted. The existing buildings and property boundaries restrict opportunity for road widening along Gordon Street. The Gordon Street intersection at Pyrmont Bridge Road currently permits all turning movements on account of the low traffic volumes. Adding additional two-way movements could result in some safety concerns, mostly due to the difficulty of readily accommodating two-way traffic flows. Gordon Street looking towards Pyrmont Bridge Road is shown in Figure 1.

Figure 1: Gordon Street looking south towards Pyrmont Bridge Road



Source: Google Maps accessed August 2022

Water Street is approximately 6.1m wide, with kerbside parking along the northern side. There are limited opportunities for passing, with only two driveway crossovers provided where opposing vehicles could pull over to enable passing. Mathieson Street is also approximately 6.1m wide, with kerbside parking provided along the western kerb and limited opportunities for passing.

It is noted that Council has previously raised the access interface between Pyrmont Bridge Road and the proposed shared path along the site frontage. Analysis demonstrates the local road access route (i.e. Mathieson Street/ Water Street/ Gordon Street) is not suitable to cater for service vehicles and traffic generally associated with a 10,400sqm health facility.

The proposed design provides an appropriate response to the site constraints, including emergency access, vehicle turning, set-down and pick-up arrangements, queuing, car park access and loading, all within a covered, weather-protected and appropriately illuminated and secure environment. These design and operational details are critical to support the proposed land use. As detailed below, Sydney Local Health District acknowledge the known traffic constraints for the area and consider that the proposal has addressed these with the proposed turning circles, set-down arrangements and separated loading dock.

Furthermore, retaining the existing driveway crossover in the south-east corner of the site is critical for site functionality. Given the proposed health services facility use, emergency access and facilities also form part of critical on-site requirements. In this regard, it is not appropriate to plan for ambulances to traverse narrow laneways on approach to the site (when possibly under emergency sirens), with obvious risks to emergency response times.

Consultation with TfNSW to date sought to understand any initial position in the knowledge of planning in the area in light of the general planning intent of the precinct. This was completed in good-faith and the project team has appreciated TfNSW feedback to date. We reached out to the development team in the knowledge that consistent advice and commentary would be provided and for the purpose of aiding the progression of an approach that is broadly aligned with TfNSW.

Reference: 122 - 130 Pyrmont Bridge Road and 206 Parramatta Road

2. Proposed Shared Zone

TfNSW notes Inner West Council's intent to create a new shared zone along Mathieson Street between Cahill Street and Parramatta Road.

As identified in PRCUTS Precinct Transport Report (2016), the intersection at Pyrmont Bridge Road and Parramatta Road requires investigation for a pedestrian crossing to be provided on the western approach. TfNSW identifies significant safety issues for this proposed western approach due to traffic turning left out of Mathieson Street. TfNSW recommends the conversion of Mathieson Street as a one-way (northbound) shared zone to facilitate the potential pedestrian crossing opportunity.

Response:

The project team continues to work with Council in relation to the future layout and design of Mathieson Street. If a one-way northbound shared zone is provided on Mathieson Street between Parramatta Road and Cahill Street, this would further increase the need for provision of direct site access via Pyrmont Bridge Road. Shared zones are designed to facilitate shared use between vehicles and pedestrians within a 10km/h speed environment. Funnelling traffic into a Mathieson Street shared zone does not meet the intent of a shared zone, especially considering ambulance access needs and service vehicles.

Such measures would also force all existing local area traffic and future site generated traffic into Water Street and Gordon Street to exit the precinct. This would not be appropriate given the narrow lane widths and interface with Pyrmont Bridge Road.

3. Traffic and Transport Assessment Report

The supporting Transport Assessment Report (dated June 2021) refers to the 'Draft Guide to Transport Impact Assessments March 2018 Version 5.1'. This draft guide was never formally endorsed or published. TfNSW recommends that any reference to this draft guide is removed in all documentation. TfNSW recommends the report to be updated to reflect current publications.

Response:

This comment is noted. All future references will be to the endorsed and current documents.

4. Car Parking Rate

The Leichhardt DCP parking requirement relating to 'health consulting room' and PRCUTS requirement of no more than 1 space per 150m² for 'commercial uses' are considered not suitable for the proposed use of a private hospital.

Whilst acknowledging the future vision of Camperdown Precinct is to discourage car use, support sustainable travel choices, and transition to low car dependency, it is also important to ensure an appropriate level of on-site car parking is provided to cater for future users.

The 'Guide to Traffic Generating Developments (2002)' is dated. TfNSW recommends Inner West Council as part of the future Camperdown precinct plan obtain a better estimate of the traffic and parking characteristics of the proposed private hospital through undertaking surveys of comparative private hospitals with similar scale and context.

Response:

This comment is noted with Inner West Council to determine (separately to these matters) the agreed and most appropriate manner in which the Camperdown precinct plan is to estimate future traffic and parking characteristics. In this regard, it is agreed that it is also not entirely appropriate to assess the potential development of the site as a typical commercial land use. This recognises the demand profiles

Reference: 122 - 130 Pyrmont Bridge Road and 206 Parramatta Road

associated with health services facilities together with short-term parking demands and set-down/ pick-up activity.

With the absence of immediate access to detailed and recent survey information from private hospitals in similar locations (or guidance from Council), reference has been made to the former Leichardt Council DCP 2013 to provide further context on parking rates as they relate to the development scheme.

A review of the parking rates and the area schedule results in a DCP 2013 parking requirement as summarised in Table 1. Where no specific rates are included in DCP 2013 for the specified uses, reference has still needed to rely on the TfNSW Guide to Traffic Generating Developments, 2002 (the Guide). It is noted that the below area schedule is preliminary and subject to change as the design developments, which in turn will influence the car parking requirement.

Table 1: Car Parking Requirement – Total Development

Use	Description	Size	Car Parking Rate		Car Parking Requirement	
			Minimum	Maximum	Minimum	Maximum
Hospital	Bed	90	Calculated rate (= -19.56 + 0.85 beds + 0.27 staff) (based on TfNSW Guide private hospital rate)		98 [2]	
	Staff	35				
Surgery and Post Surgery	Beds	25				
	Staff	38				
Radiology [1]	Rooms	8	2 spaces per 3 rooms	2 spaces per room	5	16
Pathology	Rooms	5			3	10
Dental/ GP Clinic	Rooms	5			3	10
Consulting Suites	Rooms	35			23	70
Pharmacy (based on DCP shops rate)	GFA	210	1 space per 50 sqm	1 space per 50 sqm	4	4
Cafe	GFA	210	1 space per 80 sqm	1 space per 80 sqm	3	4
Total					139	212

[1] The number of proposed radiology machines have been used to determine the number of procedure/ consulting rooms.

[2] The TfNSW parking rate has been compared against current Council DCPs to confirm the appropriateness of adopting the TfNSW parking rate.

Assuming the above space utilisation, the proposed development would be required to provide between 139 and 212 car parking spaces. Recognising the location of the site and the Parramatta Road Corridor Urban Transformation Precinct Transport Report aim to minimise parking, it is appropriate to apply the minimum parking rates.

With respect to the TfNSW comment that they consider the TfNSW Guide rates to be dated, it is recognised that this comment is applicable to only the hospital and surgery components of the development, with the DCP parking rates applied to the remainder of the development. On this basis, additional work has been undertaken to understand how the TfNSW rates compare against other comparable Council rates in similar LGAs in terms of parking requirements for private hospitals. This approach is considered appropriate, highlighted by the knowledge that typical demand profiles and day-to-day use of private hospitals have not materially changed over several years. Therefore, for the proposed private hospital land use as part of the proposed development, the guidelines can still be considered representative and accurate in terms of traffic and parking effects.

Reference: 122 - 130 Pyrmont Bridge Road and 206 Parramatta Road

In this regard Table 2 highlights selected private hospital rates adopted for other LGAs and the resultant car parking requirement when applied to the hospital and surgery components of the development. The DCP parking rates and requirements shown in Table 1 for the remainder of the development are still applicable.

Table 2: Summary of parking requirements (private hospitals and surgery)

Council Area	Car Parking Rate (private hospitals)	Car Parking Requirement
Willoughby Council (DCP 2006)	1 space per registered medical practitioner or dentist + 1 space per 2 other employees +1 space per 3 beds for visitors	Assumed 30% registered medical practitioners, i.e. $22 \times 1 = 22$ + 70% other employees i.e. $51 / 2 = 26$ + 120 beds / 3 = 40 Total 88 spaces
Parramatta Council (DCP 2011)	RMS Guidelines or comparable development	As per Table 1 above Total 98 spaces
City of Ryde (DCP 2014)	= 1 space / doctor likely to be on the premises at any one time + 1 space / two employees likely to be on duty at any one time + 1 space / four beds + 1 visitor space / four beds	Assumed 30% doctors, i.e. $22 \times 1 = 22$ + 70% other employees i.e. $51 / 2 = 26$ + 120 beds / 4 = 30 + 120 beds / 4 = 30 visitors Total 108 spaces

Considering other comparable and current Council DCPs in LGA's of similar location, demographics and public transport accessibility, the private hospital component proves to have a relatively narrow range of parking requirements. Overall, the parking requirements vary between 90 and 110 spaces with Parramatta Council DCP still relying on the TfNSW Guide. This range is consistent with the preferred approach to find an appropriate balance of parking while meeting the intent of the Camperdown precinct plan.

When adopting this range and the associated DCP parking requirements for the remainder of the proposed development, the minimum parking requirement ranges between 130 and 150 spaces.

It is again noted that area schedule is preliminary and subject to change as the design develops. The actual parking requirement will be reviewed at the DA stage to confirm an appropriate quantum of parking is provided to suit the scale of development.

5. Future bus stop

TfNSW notes PRCUTS' Planning and Design Guidelines indicates a public transport "super stop" zone on part of the proposed site and that Inner West Council has advised the applicant to seek feedback from TfNSW on this matter.

TfNSW can confirm that it is unlikely that a future bus stop would be located along the Parramatta Road frontage of the proposed site due to land constraints and its proximity to a signalised intersection.

In consideration of the future vision of Camperdown Precinct, TfNSW is investigating potential transport options for Parramatta Road corridor in line with the broader transport network. At this stage, TfNSW cannot confirm the exact location of the future "super stop" in each precinct.

Reference: 122 - 130 Pyrmont Bridge Road and 206 Parramatta Road

Response:

The comments are noted.

6. Westconnex M4-M5 Link

TfNSW advises that the subject property is within or close to the WestConnex M4-M5 Link project ('Project') boundary. The EIS considered and assessed the impacts associated with the Project and Planning approval was received in April 2018. The design and construction contracts have been awarded for both stages of the project and work is underway.

After planning approvals are granted, and also after construction commences, there is always a possibility of alignment changes to roads as road and tunnel designs are refined. Therefore, there is a chance for different properties to require acquisition than those shown in Environmental Impact Statement (EIS) documentation and on Transport websites. Where this occurs, TfNSW will advise affected properties as soon as it can.

The M4-M5 Link Tunnels and Rozelle Interchange tunnel designs are available to view at www.westconnex.com.au/explore-westconnex/tunnelling-progress/, which is kept as up to date as possible but may not show recent changes in road alignments.

Further information about this project is available by contacting the WestConnex Team on 1800 660 248 or info.westconnex@transport.nsw.gov.au.

Response:

The comments are noted.

7. Camperdown Precinct – Future Precinct-Planning

TfNSW notes Inner West Council is currently preparing a draft masterplan for Camperdown precinct in collaboration with Greater Cities Commission, NSW Health, Sydney Local Health District and City of Sydney Council. We continue to welcome collaboration with Council to achieve the vision and objectives in our Tech Central Place-based Transport Strategy and look forward to providing comment or assistance where required.

Response:

The comments are noted.

8. Funding and Implementation

There is no certainty that the proposed Regional Infrastructure Contribution (RIC) will be implemented/gazetted ahead of rezoning and development envisaged within the PRCUTS. The area covered by the proposal and the Camperdown Precinct as identified in PRCUTS is not under any special infrastructure contributions plan.

TfNSW recommends DPE or Inner West Council to consider the appropriate funding mechanism pathway for regional/state infrastructure for the proposed site and for the broader Camperdown precinct plan that is consistent with the PRCUTS Infrastructure Schedule List (2016).

Response:

The comments are noted.

Reference: 122 - 130 Pyrmont Bridge Road and 206 Parramatta Road

Inner West Council letter dated 29 July 2022

2. Draft Development Control Plan and Planning Agreement matters

As noted in the SECPP decision, it is critical that the Planning Proposal be accompanied with a site-specific DCP and Planning Agreement to deliver the built form and public domain outcomes envisaged in the Planning Proposal.

Council's Property and Legal team are in the initial stages of negotiating a Planning Agreement with the proponent in relation to the proposed development and dedication of parts of site to Council. These matters relate to:

- Provision of setbacks along Cahill Street, Mathieson Street and Pyrmont Bridge Road;*
- Provision of new Shared zone along Mathieson Street to comply with the Parramatta Road Corridor Urban Transformation Strategy's (PRCUTS) requirement of providing walking and cycling connection along Mathieson Street towards Johnstons Creek;*
- New public plaza(s) at the intersection of Mathieson Street, Parramatta Road and Pyrmont Bridge Road*

It is noted that this matter is yet to be reported to Council, nor undergone public exhibition.

Similarly, Council is assessing the supporting site-specific DCP, and it is anticipated that outcomes of this public exhibition process being undertaken (and any community and / or stakeholder concerns) will assist in informing the drafting/ reporting of Council's site-specific DCP.

It is of high importance that the finalisation of the LEP for this Planning Proposal acknowledges these outstanding matters relating to Planning Agreement and site-specific DCP.

Response:

These comments are noted. The project team will continue to work with Council to address such site specific DCP matters including the VPA, the future road environment, property boundaries and setbacks and public domain space.

4. Public Domain

Council's assessment of the Planning Proposal in October 2021 identified the following opportunities for delivering community and public domain benefits:

- an attractive built form and public domain which will deliver a gateway building aligned with the strategic objectives for the Camperdown precinct (see description of Council's Draft Structure Plan below)*
- a new landscaped public plaza and "Shared Zone" along Mathieson Street which will link with Council's proposed Shared Zone along Cahill Street/Lane (see description of Council's works along Cahill Lane below)*
- provision of walking and cycling connections along Mathieson Street between Cahill Street and Parramatta Road and enhance safety through creation of a "Shared Zone"*
- footpath widening and associated land dedications along Cahill Street, Mathieson Street, Parramatta Road and Pyrmont Bridge Road to contribute to public domain improvements*

Reference: 122 - 130 Pymont Bridge Road and 206 Parramatta Road

The current design scheme as per the public exhibition of this Planning Proposal raises safety concerns regarding potential conflict between cyclists, pedestrians, and cars/service vehicles due to the proposed vehicular access via Pymont Bridge Road.

In implementation of PRCUTS Urban Amenity Improvement Plan (UAIP), Council has developed the Pymont Bridge Road Masterplan (80% Detailed Design) to provide a new cycling link along Pymont Bridge Road. The proposed access via Pymont Bridge Road should be restricted or adequately managed through limited access as it is envisaged to be a high street with high levels of pedestrian and cyclist traffic flow.

The proposal requires further traffic and access modelling and redesign, to ascertain how vehicle access can be best accommodated for the site, in accordance with TfNSW requirements.

Response:

These comments are noted.

The potential Pymont Bridge Road access driveway would be restricted to left turns only on entry and exit. The current concept plan has been designed to accommodate the proposed pedestrian and cyclist facilities along the northern alignment of Pymont Bridge Road. As detailed above, access via Pymont Bridge Road is critical for the functional layout and operation of the site, especially considering the proposed land uses. The surrounding local road network is also not considered capable of accommodating all anticipated site generated traffic and the servicing needs associated with a 10,400sqm health facility.

As the project progresses, the site access design will be further refined with traffic and access modelling completed to consider impacts on all user groups. The current design considers the future pedestrian and cyclist facilities with swept paths completed to confirm appropriate access design. A range of vehicles will readily be able to access the site independently. Set-down and pick-up facilities internal to the site (as part of a dedicated porte cochere) have also been incorporated to minimise any such risk of vehicles queuing across the proposed cycleway on entry to the site. The swept paths are included in Attachment 1.

Maintaining a Pymont Road active frontage will simplify visitor approach and departure routes, deliver a 'front door' access for the site, limit uncertainty and maintain equitable use of the site in a location close to Parramatta Road. It avoids unnecessary circuitous routes via narrow local streets (as discussed) and can be delivered to incorporate the future dedicated cycleway all while limiting access to left turns only.

Furthermore, use of the surrounding local road network by site generated traffic, where shared zones and increased walking and cycling connections are also proposed are not complementary. Shared zones are typically low traffic volume roads with quality pedestrian and cyclist amenity – the function of these zones could be compromised should traffic be funnelled to use these local streets. Separating traffic as much as practical from these local environments is key to not only the site but also the broader Camperdown precinct.

5. Cahill Street Masterplan

Council has secured funding for new shared zones and public spaces along Cahill Street and Cahill Lane as part of the NSW Government's Public Spaces Legacy Program (122-130 Pymont Bridge Road, 206 Parramatta Road, Annandale - Inner West Council (nsw.gov.au) see Appendix 15.

This will intersect with the Mathieson Street Shared Zone which can be provided through this Planning Proposal. This proposal has the potential to contribute towards following public domain works:

- Provide a minimum of 6m setback and land dedication along the Mathieson Street frontage;

Reference: 122 - 130 Pymont Bridge Road and 206 Parramatta Road

- Create a new "Shared zone" along Mathieson Street between Cahill Street and Parramatta Road to engender a sense of a larger and enhanced space for cyclists, pedestrians, and vehicles. This will link to Council's proposed Shared Zone along Cahill Street/Lane as well as provide part of the PRCUTS desired pedestrian and cycling link to the Johnstons Creek corridor;

- Provide at least 1.5m ground floor and first floor setback along Pymont Bridge Road to facilitate footpath widening and landscaping; and

- Refine the built form at the intersection of Mathieson Street, Parramatta Road and Pymont Bridge Road to allow a sufficient setback and sight lines for cyclists to round the corner to the Pymont Bridge Road cycleway safely.

The Planning Proposal and supporting DCP must incorporate the above-mentioned public domain works, to the satisfaction of both Council and Transport for NSW. In doing so, the following key outcomes to be achieved through this Planning Proposal include:

- To enhance and activate the public domain, including activating ground floor land uses on Pymont Bridge Road, Parramatta Road, and part of Mathieson Street.

- To enhance the public domain around the site, including upgraded landscaping, pedestrian access and cycleway to Pymont Bridge Road and Mathieson Street.

- To create a shared zone with improved public domain on Mathieson Street.

- To provide appropriate pedestrian and vehicular access and servicing arrangements to allow the efficient operation of the proposed development on the site.

- To encourage active transport and support public transport mode share.

Response:

These comments are noted. The above requirements have been incorporated into the Draft VPA Offer and Draft SSDCP. The proposal supports the above key outcomes, with the project team activity working with Council to create active frontages along Mathieson Street and Cahill Lane.

Sydney Local Health District letter dated 25 July 2022

Implications for the environment

- Sydney Local Health District considers that the proposed development is aligned with the height and density of buildings within the near vicinity, and has considered a range of health related issues due to noise and air quality as well as the traffic that will enter and exit the site at the front and dock entrances.

- There are known traffic and transport constraints associated with the area and these have been considered with the inclusion of a turning circle, drop off areas and separate dock.

- Suggestions for improving pedestrian safety/access in the proposal include:

- continuous footpath treatment or pedestrian crossing at Parramatta Rd/Mathieson St intersection*
- continuous footpath treatment at Cahill Ln/Mathieson St and Cahill St/ Mathieson St intersections*
- design speed of Cahill St and Mathieson St 20km/h*

Reference: 122 - 130 Pyrmont Bridge Road and 206 Parramatta Road

- More detail is required about the proposed pedestrian/bicycle "shareway" on Mathieson St. Please refer to Transport for NSW Cycleway Design Toolbox.

Response:

This comment is noted, including the explicit recognition that the turning circle, drop off and separate dock incorporated into the proposed design have been considered in the context of the traffic and transport constraints of the area. The current design considers the traffic and transport constraints of the site and has been designed to meet the operational requirements of the proposed land uses.

The project team will continue to work with key stakeholders to consider the safety of all users.

Sincerely,

STANTEC AUSTRALIA PTY LTD



Rhys Hazell

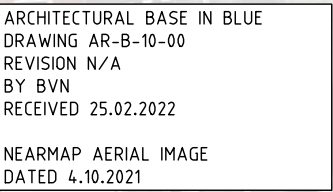
Senior Principal Transportation Planner

stantec.com

Attachment: Vehicle swept paths

Reference: 122 - 130 Pyrmont Bridge Road and 206 Parramatta Road

Attachment 1 – Vehicle Swept Paths



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SWEPT PATH KEY

—

VEHICLE CENTRE LINE

—

VEHICLE TYRE PATH

—

VEHICLE BODY PATH

—

300mm CLEARANCE FROM VEHICLE BODY

ASSUMED SPEED 5km/h

5.20

0.95

3.05

B99

Width : 1.94

Track : 1.84

Lock to Lock Time : 6.0

Steering Angle : 33.9

meters

ARCHITECTURAL BASE IN BLUE
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DATED 4.10.2021

PRELIMINARY PLAN
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WARNING
BEWARE OF UNDERGROUND SERVICES
THE LOCATIONS OF UNDERGROUND SERVICES ARE
APPROXIMATE ONLY AND THEIR EXACT POSITION
SHOULD BE PROVEN ON SITE. NO GUARANTEE IS
GIVEN THAT ALL EXISTING SERVICES ARE SHOWN.

DESIGNED
M.RIMAC

APPROVED BY
R.HAZELL

DESIGN CHECK
R.HAZELL

DATE ISSUED
4 MARCH 2022

SCALE
A3 0 2.5 5 10 1:500

CAD FILE NO.
301401108-01-P4.DWG

122-130 PYRMONT ROAD AND
206 PARRAMATTA ROAD, ANNANDALE, NSW 2038
LEVEL 00
VEHICLE SWEEP PATH ASSESSMENT
DRAWING NO. 301401108-01-02 SHEET 02 OF 11 ISSUE P4

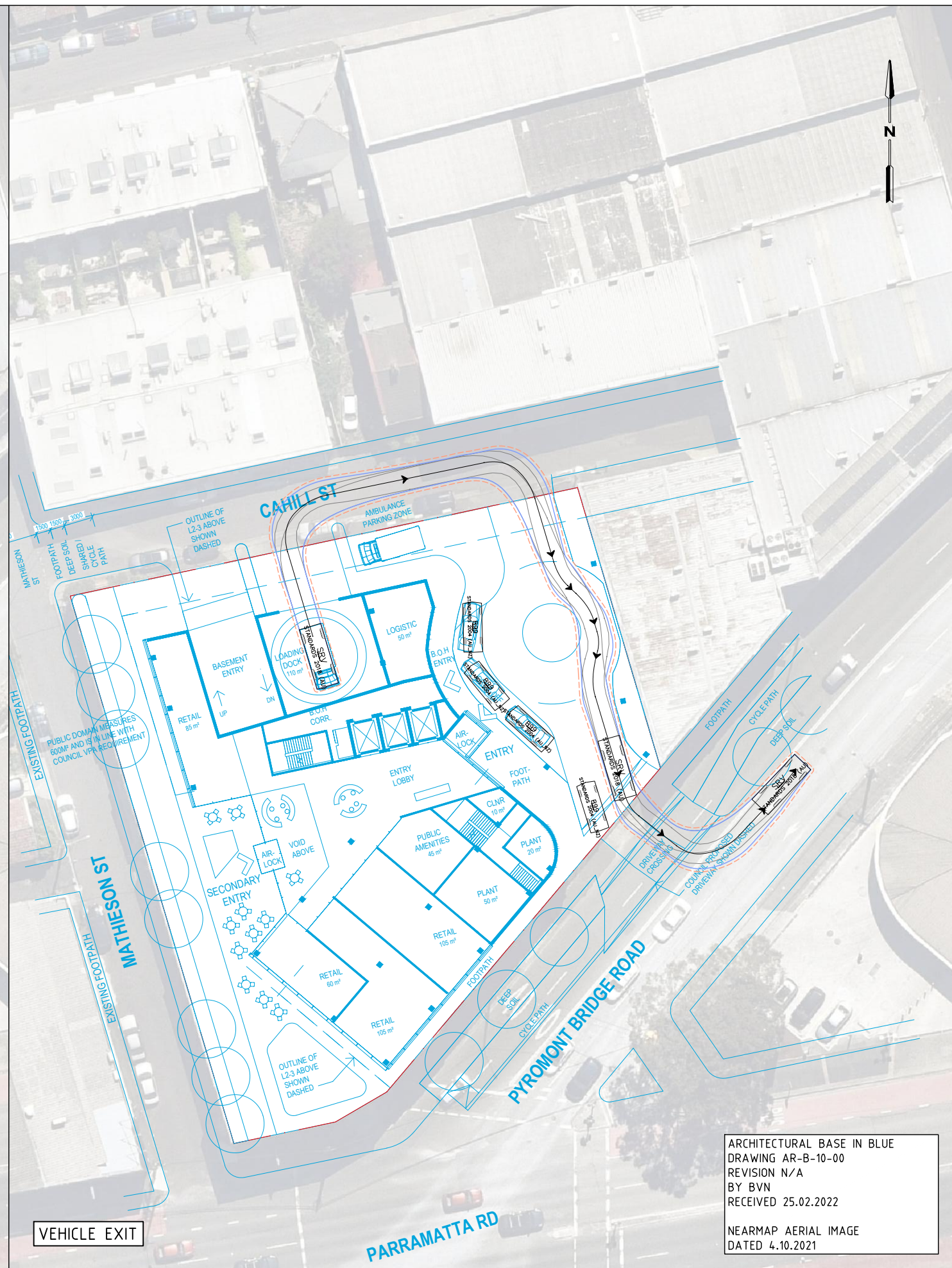
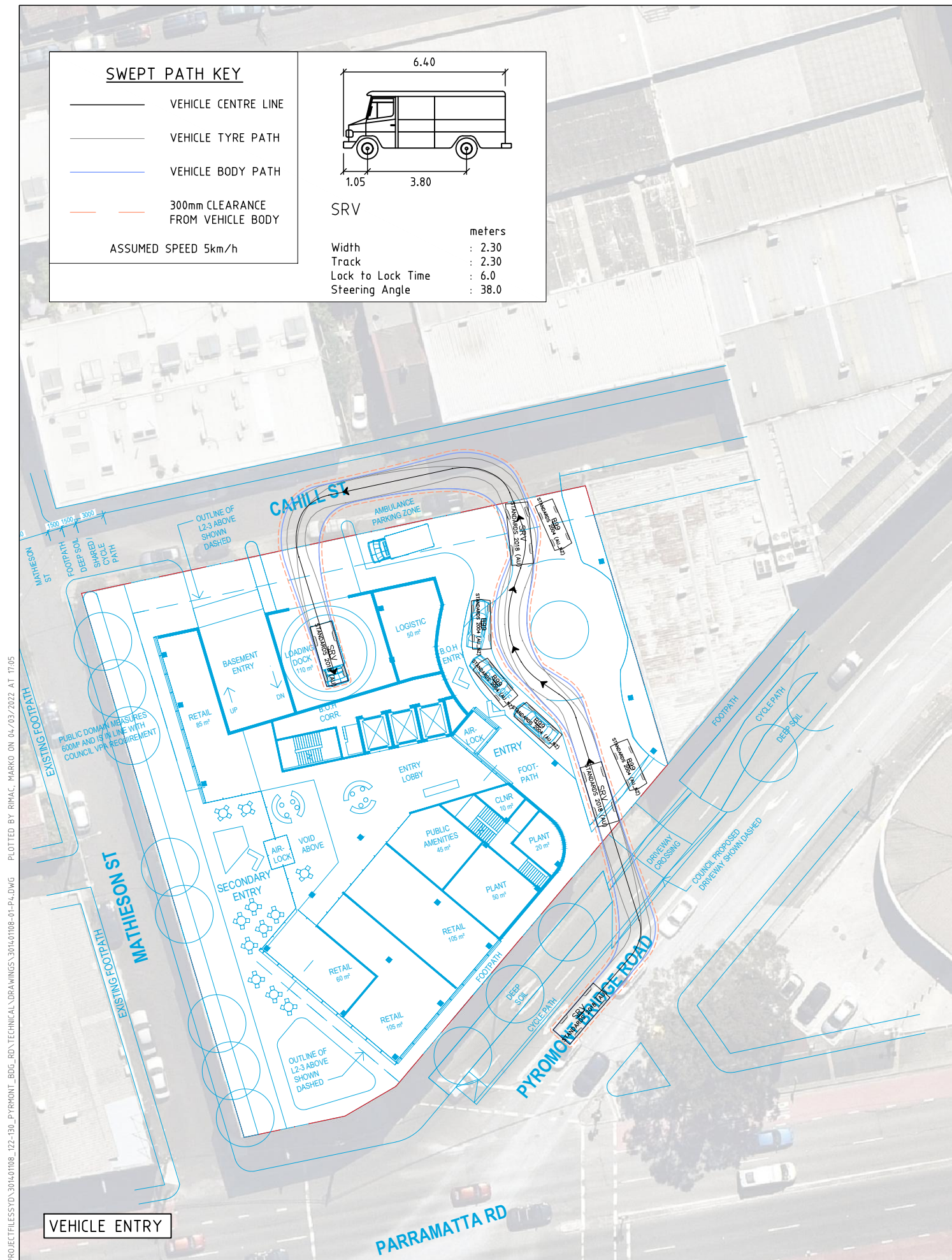
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SWEPT PATH KEY

- VEHICLE CENTRE LINE
- VEHICLE TYRE PATH
- VEHICLE BODY PATH
- 300mm CLEARANCE FROM VEHICLE BODY
- ASSUMED SPEED 5km/h

SRV

Width	: 2.30	meters
Track	: 2.30	
Lock to Lock Time	: 6.0	
Steering Angle	: 38.0	



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DESIGNED
M.RIMAC

APPROVED BY
R.HAZELL

DESIGN CHECK
R.HAZELL

DATE ISSUED
4 MARCH 2022

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VEHICLE SWEPT PATH ASSESSMENT
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SWEPT PATH KEY

- VEHICLE CENTRE LINE
- VEHICLE TYRE PATH
- VEHICLE BODY PATH
- 600mm CLEARANCE FROM VEHICLE BODY
- ASSUMED SPEED 5km/h

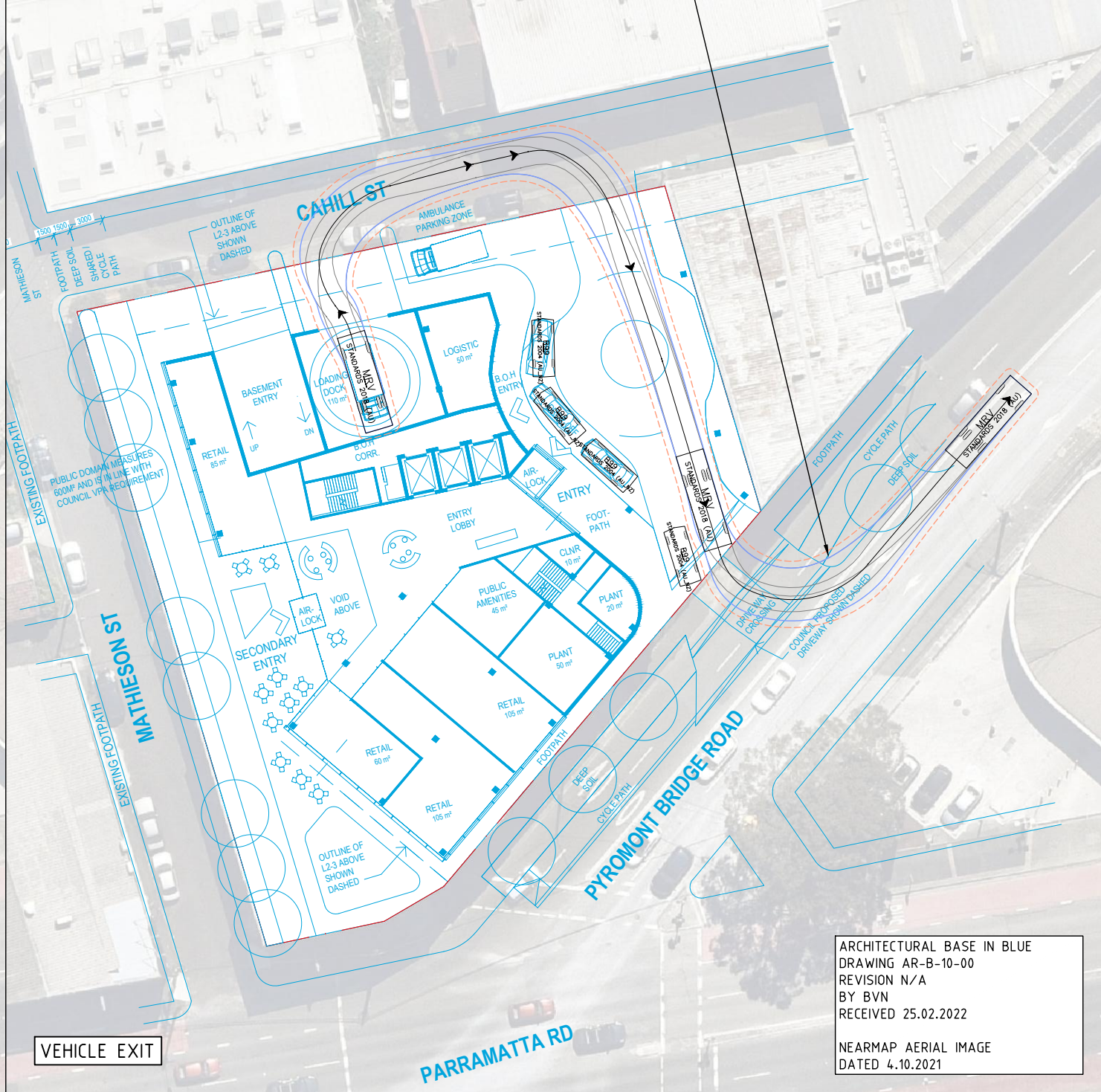
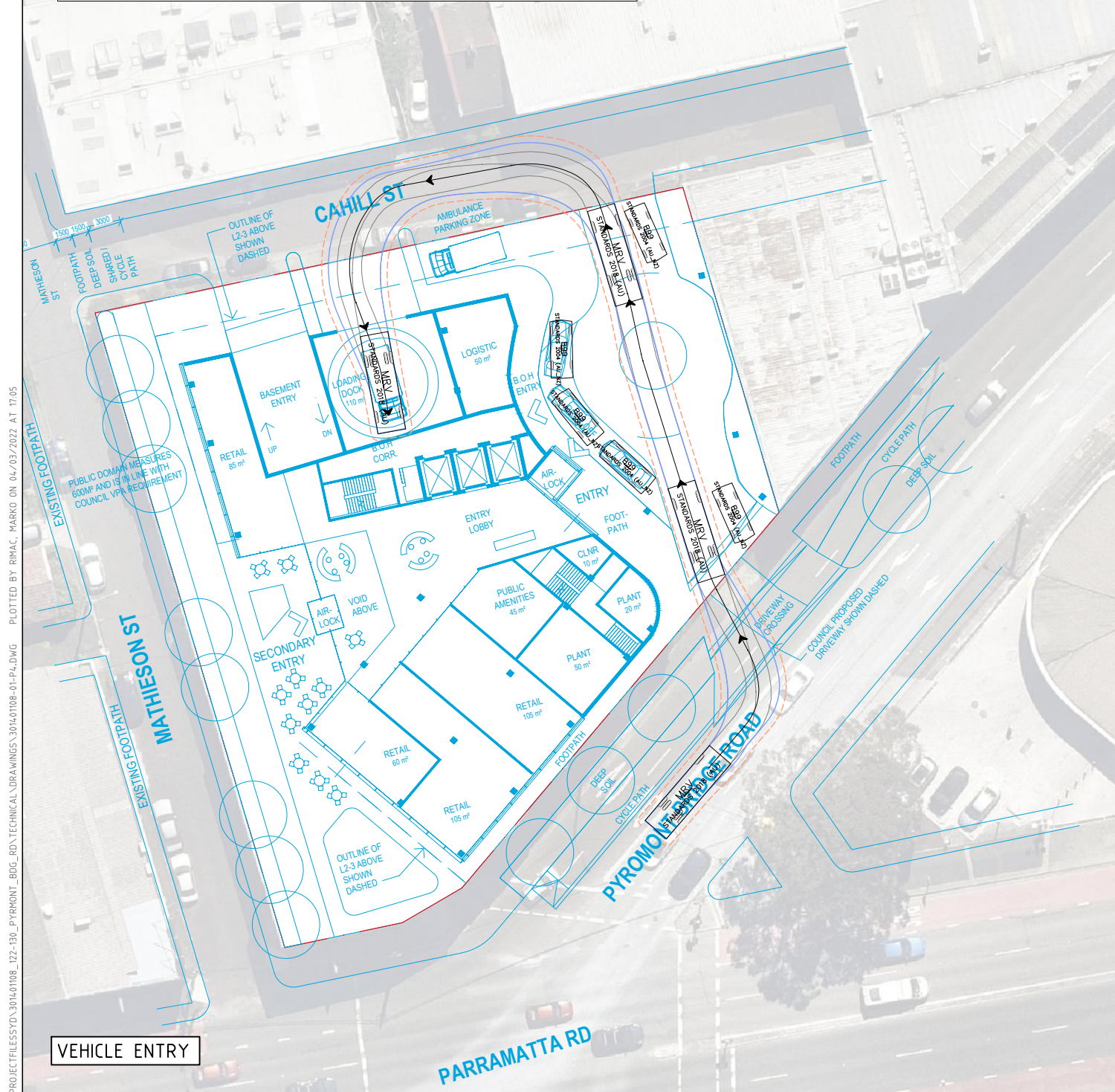
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1.50 5.00

MRV

Width : 2.50
Track : 2.50
Lock to Lock Time : 6.0
Steering Angle : 34.0

meters



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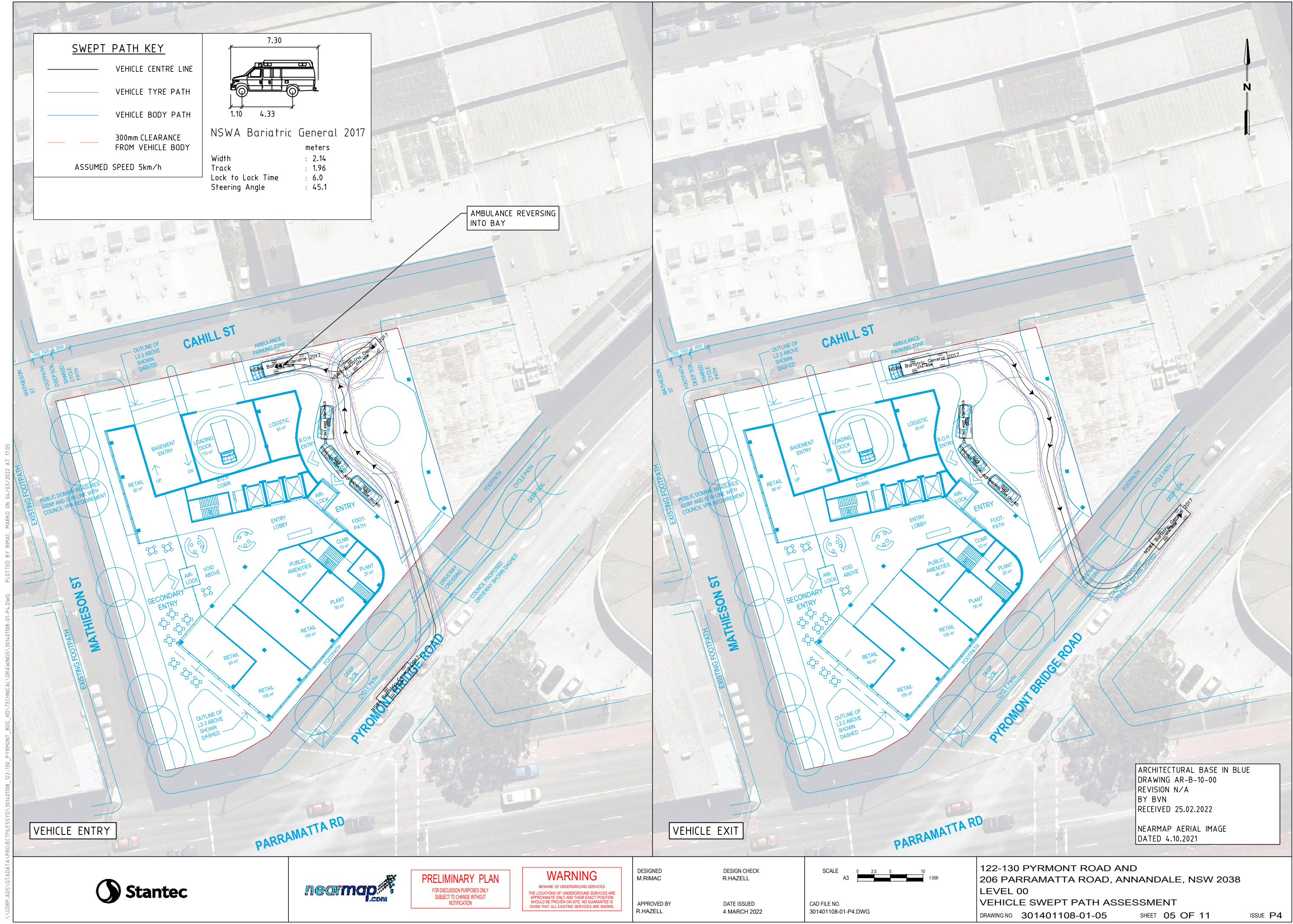
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R.HAZELL

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4 MARCH 2022

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122-130 PYRMONT ROAD AND
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VEHICLE SWEEP PATH ASSESSMENT
DRAWING NO. 301401108-01-04 SHEET 04 OF 11 ISSUE P4



SWEPT PATH KEY

- VEHICLE CENTRE LINE
- VEHICLE TYRE PATH
- VEHICLE BODY PATH
- 300mm CLEARANCE FROM VEHICLE BODY
- ASSUMED SPEED 5km/h

7.30

1.10

4.33

NSW Bariatric General 2017

Width	: 2.14	meters
Track	: 1.96	
Lock to Lock Time	: 6.0	
Steering Angle	: 45.1	

AMBULANCE REVERSING INTO BAY

VEHICLE ENTRY

VEHICLE EXIT

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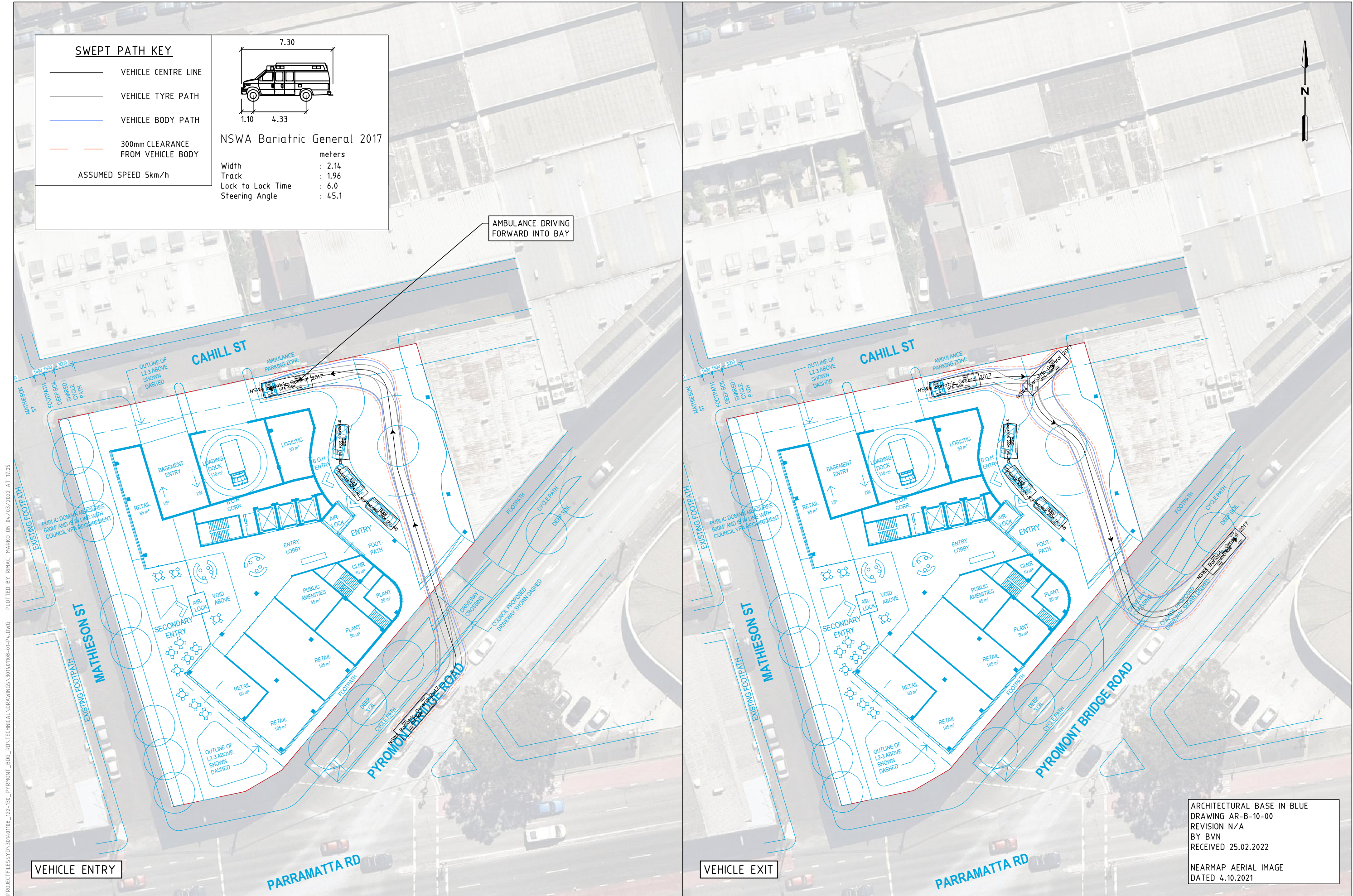
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206 PARRAMATTA ROAD, ANNANDALE, NSW 2038
LEVEL 00
VEHICLE SWEPT PATH ASSESSMENT
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206 PARRAMATTA ROAD, ANNANDALE, NSW 2038
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VEHICLE SWEEP PATH ASSESSMENT
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