



***MODIFICATION REQUEST:  
Sydney Adventist Hospital Alterations  
and Additions  
185 Fox Valley Road, Wahroonga  
(MP10\_0070 MOD 3)***

- modification to the built form of the Education Centre, including a height reduction from three to two storeys and larger building footprint.
- construction and provision of an additional 34 car spaces.

Director-General's  
Environmental Assessment Report  
Section 75W of the  
*Environmental Planning and Assessment Act*  
1979

June 2012

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## 1. BACKGROUND

On 3 March 2011, the Planning Assessment Commission, as delegate for the Minister for Planning and Infrastructure, approved a project application (MP10\_0070) for staged alterations and additions to the Sydney Adventist Hospital, Wahroonga. The approval consisted of:

- staged expansion and refurbishment of the Clinical Services Building (CSB);
- refurbishment of existing hospital buildings;
- construction of 3 – 4 storey Education Centre;
- demolition and construction of a new Shannon Wing;
- Relocation of Bethal House and Memorial Fountain to create the Merritt Kellogg Museum;
- staged construction of a multi-deck car park and new at-grade parking for 970 spaces;
- expanded at-grade staff car parks for an additional 86 spaces;
- temporary car park for 258 cars during construction;
- construction of a concourse;
- new entry to hospital;
- new perimeter road around multi-deck car park to connect existing access road; and
- new and upgraded landscaping.

The project location is shown in Figure 1. This modification is to the approved education centre, the location of which is shown in Figure 1.

Figure 1: Project Location





- amendment to the temporary car park to provide 413 spaces (an additional 155 spaces);
- alteration and reconfiguration to the layout of the permanent western at-grade car parks to provide 84 spaces (reduction of 2 spaces);
- amendments to the built form and layout of the multi-deck car park and arrival podium to provide 896 spaces;
- revised entry building and deletion of concourse building; and
- revised design of the entry to the Clifford Building linking to the proposed entry building.

- Amended CSB built form and floor layout, to support staffing and servicing arrangements;
- CSB GFA increase of 957sqm (SAH site total of 19,775sqm GFA);
- CSB building height increase of 3.5m, resulting in a 3.3m departure from the 39.5m maximum building height control (cl.18(1) of Part 25 of Sch 3 of MD SEPP); and
- Amended development staging schedule.

**Figure 2: Project Layout (as amended by MOD 2)**





## 2. PROPOSED MODIFICATION

The proposal entails modifications to the approved education centre, required to ensure that the education centre is better integrated into various aspects of the overall SAH redevelopment, including the future adjacent student residential accommodation.

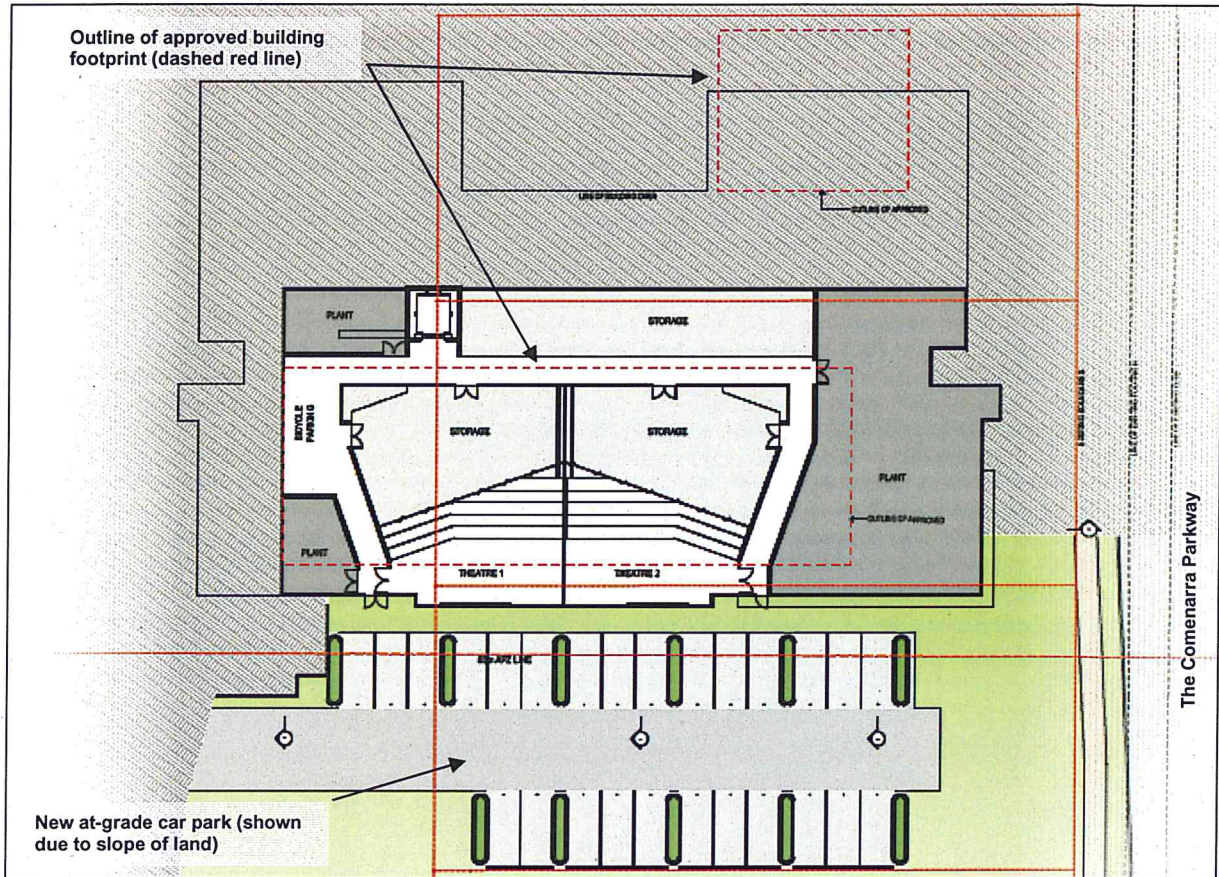
The proposed modification includes:

- The approved and proposed amended education centre design is detailed in Figures 3 – 6.

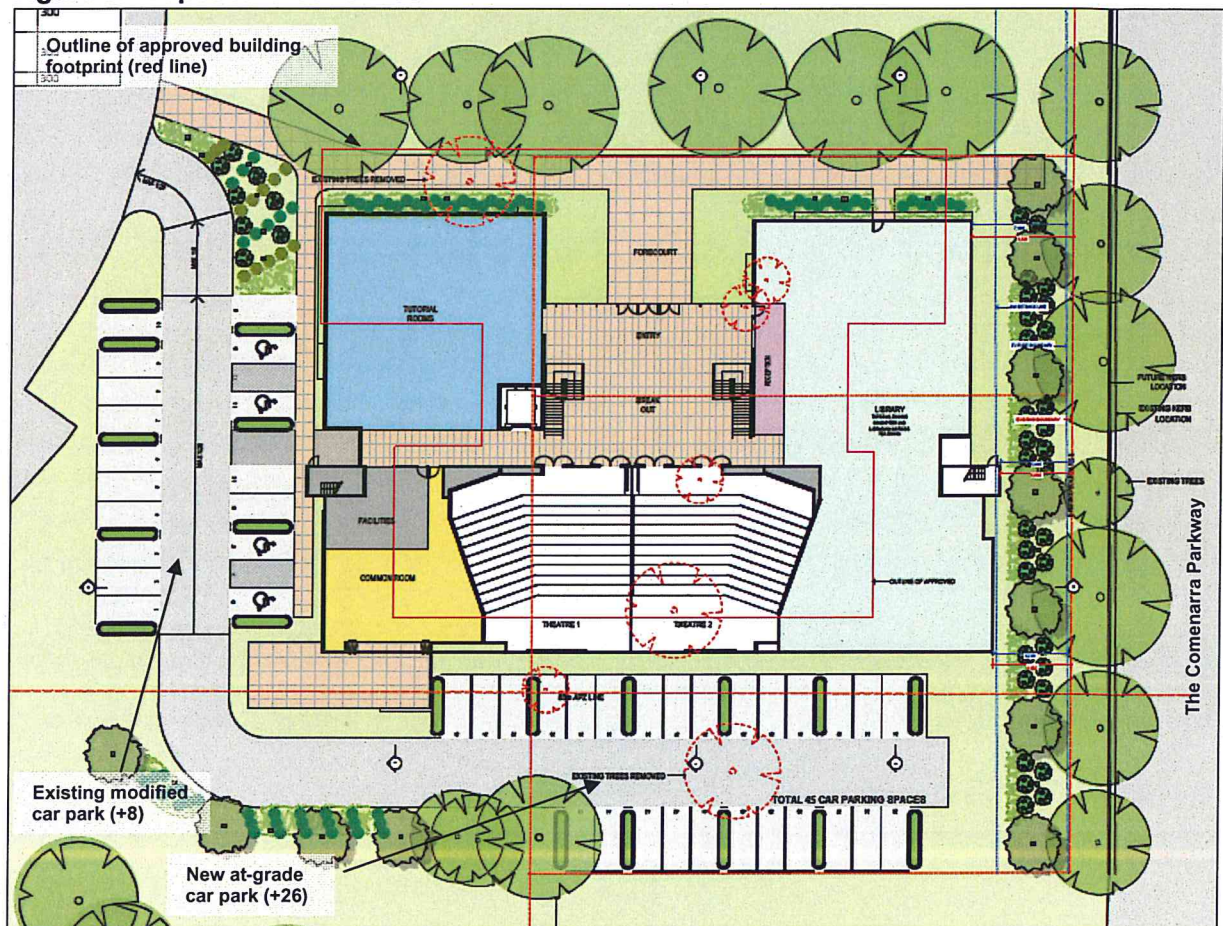
The floor plan illustrates the layout of the University of the Pacific Administration Building. At the top is a large rectangular area designated for 'STAFF FACILITIES', which includes a Cash Office, Administration Office, Accounting Office, Library, Staff Lounge, Conference Room, Reception Office, and various other offices. Below this is a central corridor area with a 'P' (Parking) symbol and a 'STAFF LUNGE' area. At the bottom are three lecture theatres: 'LECTURE THEATRE 1' (100 seats), 'LECTURE THEATRE 3' (150 seats), and 'LECTURE THEATRE 2' (100 seats). The building is surrounded by a boundary line, and a parking area is shown on the left side.



**Figure 4: Proposed Basement/Lower Ground Level**



**Figure 5: Proposed Ground Floor**





The site plan illustrates the layout of The Comenarra Parkway. A dashed red line outlines the approved building footprint. The plan includes several key areas:

- Simulation Centre:** A yellow rectangular building on the left side of the main structure.
- Training Rooms:** Two pink rectangular buildings, one on the top right and one on the bottom right.
- Administration:** A blue L-shaped building on the bottom left.
- VED (Vehicle Examination Drive):** A central paved area between the simulation and training rooms.
- Facilities:** Several smaller grey rectangular buildings labeled 'FACILITIES' are distributed around the main buildings.
- Parking:** A large parking area is located on the left side, adjacent to a road.
- Landscaping:** Various trees and shrubs are indicated throughout the site, including a row of trees along the left boundary and a cluster of trees at the bottom center.
- Boundaries:** The site is bounded by a dashed red line, with a 'SCAPELINE' indicated at the bottom.

On the right side of the plan, there is a vertical label: "The Comenarra Parkway".

### 3.1 Modification of the Minister's Approval

Section 75W(2) of the *Environmental Planning and Assessment Act 1979* (the EP&A Act) provides that a proponent may request the Minister to modify the Minister's approval of a project. The Minister's approval of a modification is not required if the approval of the project as modified would be consistent with the original approval. As the proposal involves modifications the design and scale of the approved education centre and involves the addition of new car parking, the modification will require the Minister's approval.

Section 75W(3) of the EP&A Act provides the Director-General with scope to issue Environmental Assessment Requirements (DGRs) that must be substantially complied with before the matter will be considered by the Minister. Environmental Assessment Requirements were not issued for this modification as the proponent has addressed the key issues in the modification request.

The Minister has delegated his functions to determine Part 3A modification applications to the Planning Assessment Commission (PAC) where an application has been made by persons other than by or on behalf of a public authority.



The modification application is being referred to the PAC for determination as the proponent, Sydney Adventist Hospital, lodged a political disclosure statement with the subject modification application, disclosing a number of reportable political donations made during 2010, 2011 and 2012.

## **4. CONSULTATION AND SUBMISSIONS**

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### **4.1 Exhibition**

Under Section 75X(2)(f) of the EP&A Act, the Director-General is required to make the modification request publicly available. The Department publicly exhibited it from 25 January 2012 until 29 February 2012 on the Department's website, at the Department's Information Centre and at Ku-ring-gai Council. The modification request was also advertised in the Sydney Morning Herald and Daily Telegraph on 25 January 2012 and Hornsby Advocate on 26 January 2012 and landholders and relevant State and local government authorities were notified in writing.

The Department received five submissions during the exhibition of the modification request – four submissions from public authorities, including Roads and Maritime Services (RMS), the Office of Environment and Heritage (OEH), Rural Fire Service (RFS), and Ku-ring-gai Council and one submission from the general public. A summary of the issues raised in submissions is provided below.

### **4.2 Public Authority Submissions**

Comments received from RMS, OEH and RFS raised no objections to the proposed modifications to the education centre. Ku-ring-gai Council's submission did not object to the proposed modification, but provided comments in relation to the amended built form, setback, landscaping and car parking. A summary of its comments are provided as follows:

- Height reduction seen as a positive step towards acknowledging the single and double storey homes that form The Comenarra Parkway streetscape.
- Requested that the drawings be corrected to detail the true height and setback of residential development fronting the southern side of The Comenarra Parkway.
- The drawings do not accurately show the 6m building setback to the property boundary affected by scheduled road widening works on The Comenarra Parkway. Council requests that the new actual property boundary line and setback, post road-widening, be clearly indicated on the drawings.
- The modification proposes a substantially reduced building setback to The Comenarra Parkway and will reduce the available landscape area for planting. Council requests that the education centre building have a minimum 12m setback to the new property boundary line on The Comenarra Parkway.
- The size and location of the car park has been significantly altered. Council requests that the split car parks be combined into one area located close to the hospital's existing internal ring road and remove the proposed car park adjacent to The Comenarra Parkway.

### **4.3 Public Submissions**

One public submission was received, raising concerns about the building's minimum setback to The Comenarra Parkway, lack of suitable landscaping and the proposed



car park size and location. The submitter also commented, however, that the proposed building height reduction was a positive change.

The Department has considered the issues raised in submissions in its assessment of the proposed modification.

## 5. ASSESSMENT

The Department considers the key issues for the proposed modification to be:

- built form
- landscaping
- car parking

### 5.1 Built Form

The modification request seeks to modify the built form from a 3 storey (including basement plant/storage and part lecture theatre) to a 2 storey building (including basement plant/storage and part lecture theatre). Figures 7 – 10 provide a comparison between the approved built form of the education centre and the proposed amendments, in which the key modifications to the building height and The Comenarra Parkway setback can be seen.

Figure 7: Approved North Elevation

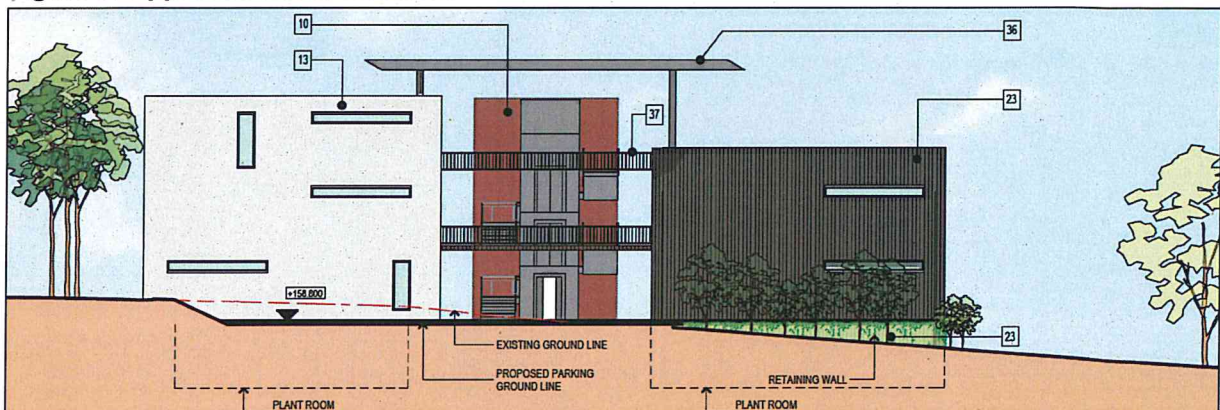
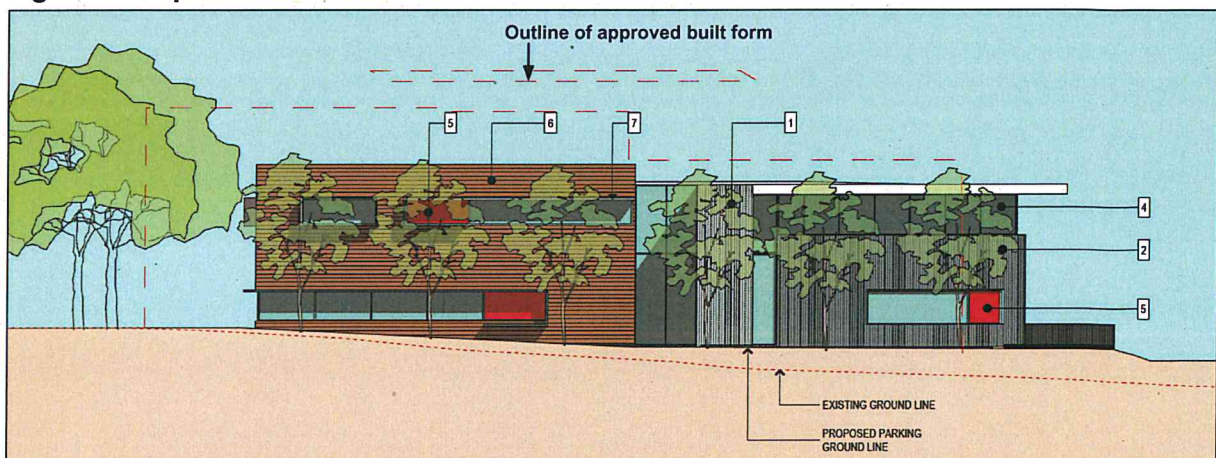
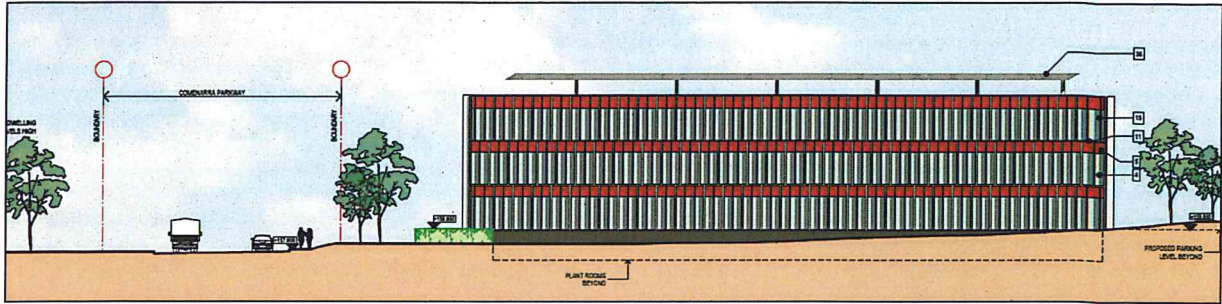


Figure 8: Proposed North Elevation

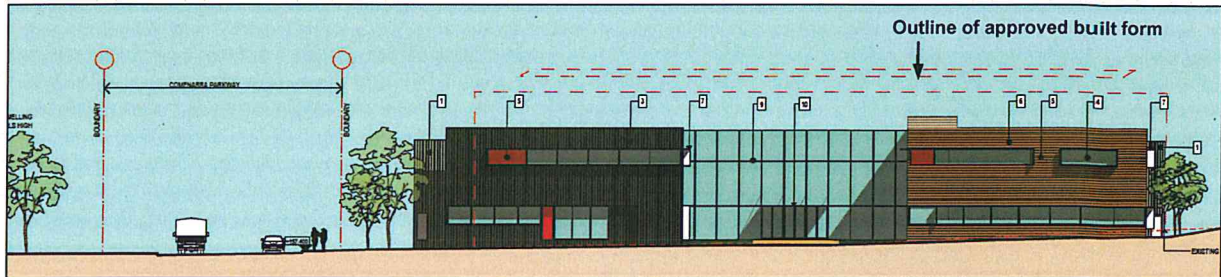




**Figure 9: Approved East Elevation**



**Figure 10: Proposed East Elevation**



The maximum height of the building has been reduced from 14.9m to 10.8m. Importantly, the height of the building's frontage to The Comenarra Parkway has been reduced from approximately 12.6m to 9.5m, creating a more sympathetic built form in response to the existing 1 to 2 storey residential buildings fronting the southern side of The Comenarra Parkway.

The proposed removal of the third level from the education centre results in a slightly larger building footprint to accommodate the approved 3,500sqm of floor space. Consequently, the amended design proposes a reduced setback to The Comenarra Parkway, proposing a setback between 6.3m – 7.98m, subject to a minor encroachment of the stairwell that is proposed to be setback 5.08m.

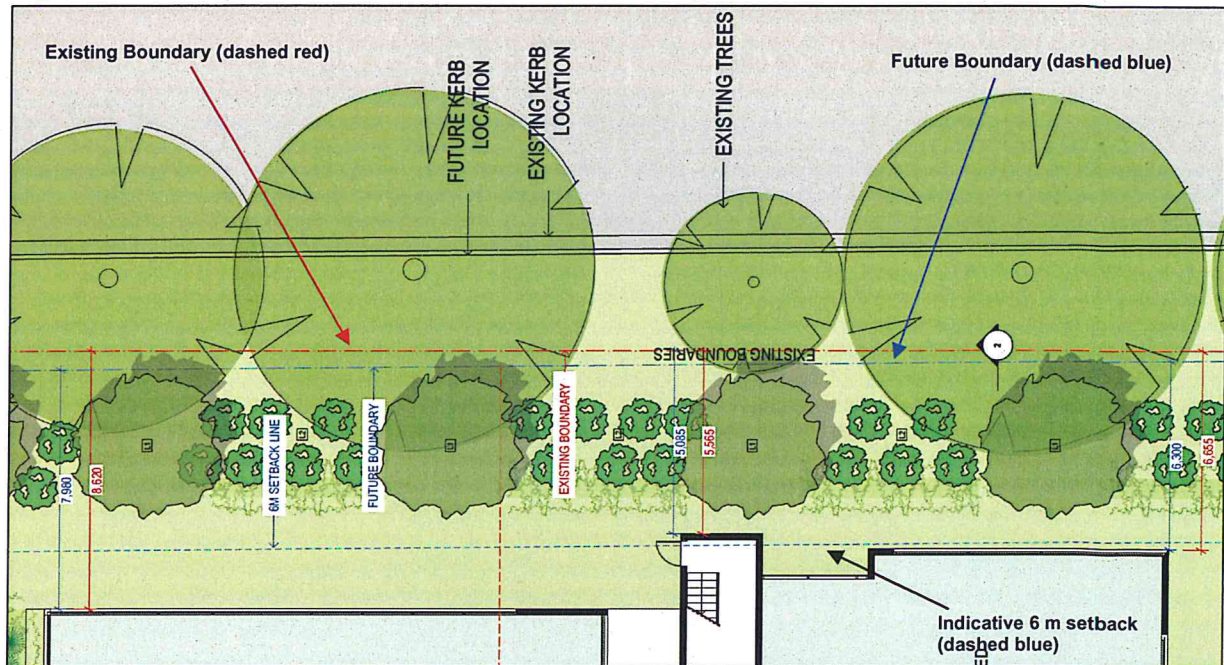
Council has raised concerns regarding the reduced setback from that previously approved (varying between approximately 10m – 16m), noting that the proposed scale of the education centre is consistent with a 3 storey residential flat building (RFB), which Council requires to be setback a minimum 10m to a maximum 15m. In addition they advised that existing residential dwellings fronting The Comenarra Parkway provide setbacks of between 9m and 12m.

The Department is of the opinion that the proposed amended 9.5m – 10.8m scale of the education centre is not considered to be consistent with a 3 storey RFB. Furthermore, the approved Wahroonga Estate Concept Plan (MP07\_0166) identifies a minimum 6m setback requirement to a 2m verge on the northern side of The Comenarra Parkway. In this regard, the proposal is generally consistent with the concept plan, subject to the minor encroachment of the stairwell, while the existing verge to The Comenarra Parkway would be maintained at approximately 3m in width.

The Department acknowledges that the future road widening works to The Comenarra Parkway may impact on the existing property boundary alignments and accompanying building setbacks. However, the proponent has provided information detailing the design of the proposed upgrades and future property boundary, that satisfactorily details the proposed amended education centre will achieve a 6m setback, subject to a minor encroachment of the stairwell (see Figure 11).



**Figure 11: Ground Floor Plan Extract – Future Building Setbacks**



The Department considers that the amended building design and footprint are satisfactory and will provide an improved built form response to the existing streetscape character of The Comenarra Parkway. Further, the setbacks proposed maintain consistency with the approved Wahroonga Estate Concept Plan and will ensure that existing landscaping is maintained and that the potential for future landscaping exists.

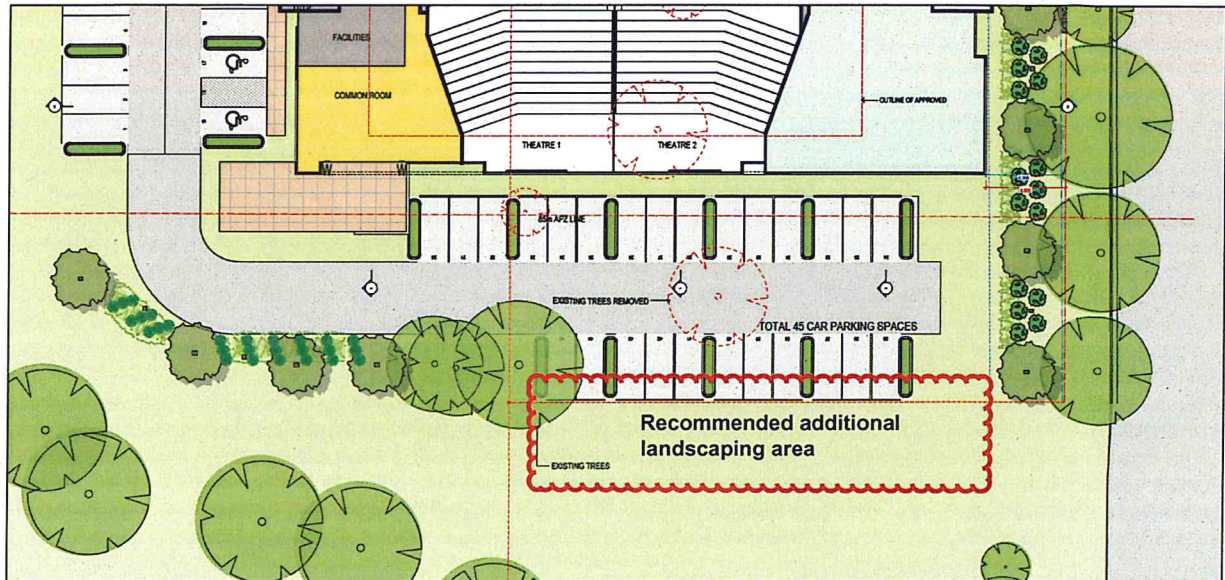
## 5.2 Landscaping

Concerns were raised in relation to the lack of available landscape area for the establishment of screen planting for both the proposed amended built form and proposed new car park extension. A number of mature street trees exist along the northern side of The Comenarra Parkway and are identified as being required for retention. Details provided by the proponent in relation to the future road widening works confirm that these existing trees are capable of being maintained. Further, additional screen planting is proposed along the northern façade of the building that will provide suitable screening of the proposed built form.

The Department considers it appropriate that additional screen planting be provided to the proposed new 34 space car park. Accordingly, a new condition is recommended to ensure that the length of the western edge of the new 34 space car park extension is suitably screened with vegetation (area outlined in red in Figure 12). The establishment of such vegetation within this location will ensure that the character of the existing streetscape is appropriately maintained.



**Figure 12: Recommended Landscaping**



### 5.3 Car Parking

The modification request seeks approval to amend the existing education centre car park and for the construction of a new car park on the western side of the education centre, to make provision for an additional 34 car parking spaces. Access to the car park would be provided via the approved 9 space car park.

The Wahroonga Estate Concept Plan (MP07\_0166) indicated the parking needs of the SAH redevelopment to be approximately 2,184 parking upon completion of the hospital redevelopment in 2020. The concept plan also provided an indicative approval for the education centre of 119 car parking spaces based on a total future population of 450 students (approximately an additional 150 students).

Under MP10\_0070, it was assessed that a total of 2058 car parking spaces were required for the hospital redevelopment, later reduced to 2052 spaces (as amended by MP10\_0070 MOD 1), with the approved multi-deck car park facility designed to cater for the majority of hospital car parking needs. No specific allocation of car parking was undertaken for each component of the SAH hospital campus, however the traffic impact assessment accompanying MP10\_0070 did not consider the increase in student population and parking demand as assessed under the concept plan.

As a result, the proposed modification seeks an additional 34 spaces for the education centre to more appropriately cater for the parking demand generated by the education centre and its future additional 150 student population.

The proponent's traffic advice submitted with the modification request notes that the existing education centre within the hospital is utilised by approximately 65 resident students and 300 non-resident students along with 20 staff, of which a significant number drive and park on the site. Their vehicle movements and traffic impacts were considered and accounted for as part of the existing 'base' traffic generation numbers assessed under the project application.

As a result of the traffic demands projected based on the increase in hospital vehicle movements, the project application (MP10\_0070) traffic assessment proposed a



series of upgrade works to Fox Valley Road and The Comenarra Parkway to improve intersection functionality. Through discussions with RMS, the design of the intersection upgrade has advanced, with a scheme now developed that provides greater avoidance delays, shorter pedestrian crossings, two unimpeded southbound lanes, and the provision of a bay to facilitate right turn movements into Fox Valley Road west enabling an efficient overlap phasing for The Comenarra Parkway.

The Department considers the additional parking spaces appropriate for the education centre. The additional parking spaces will not detrimentally impact on the surrounding road network, to which future road upgrades will satisfactorily cater for the hospital redevelopment, including the envisaged student and staff population. The proposed location, while taking up additional soft landscaping space, will be suitably screened and will not detrimentally impact on the existing setting.

## 6. CONCLUSION

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The modification request seeks approval to modify the design of the approved education centre to a two storey built form and amend the existing new car park and construct a new at-grade car park to provide an additional 34 spaces.

The Department has reviewed the proponent's modification request and accompanying plans and considers the key issues to be built form, landscaping and car parking.

In assessing the key issues, the Department considers that the proposed amendments to the education centre built form will reduce the bulk and scale of the approved scheme and positively contribute to the existing streetscape character. The additional parking spaces proposed will be satisfactorily accommodated within the existing road network, which is subject to road upgrade works to improve its efficiency and operation. The recommended landscaping condition will require the western edge of the proposed new car park to be suitably screened and will ensure that the landscaped character of The Comenarra Parkway is maintained and enhanced.



## 7. RECOMMENDATIONS

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The Department's recommends that the PAC:

- a) **consider** the findings and recommendations of this report;
- b) **approve** the modifications, subject to conditions, under section 75W of the *Environmental Planning and Assessment Act, 1979*, and;
- c) **sign** the attached instrument of modification approval (Appendix C).

  
Director  
Metropolitan and Regional Projects North

 6.6.12  
Executive Director  
Major Projects Assessment

 12/6/12  
Deputy Director-General  
Development Assessment and  
Systems Performance