

23 November 2012

Mr Sam Haddad
Director General
NSW Department of Planning and Infrastructure
GPO Box 39
Sydney NSW 2001

Attention: David Gibson and Peter McManus, Metropolitan and Regional Projects North

Dear Mr Haddad

Re: S75W – Modification Request (MOD 3): Claiming and Redistribution of Approved Wahroonga Estate Hospital Floorspace (07_0166)

This modification request (MOD 3) seeks to 'reclaim' previously overstated floorspace but keep the total project within the approved limits of the concept approval, i.e. within the 94,000m² total floor space that has been approved for hospital related buildings.

The overall site development initially received concept approval (issued March 2010) under previous Part 3A provisions. Project approval for works within the central hospital precinct was subsequently issued by the Planning Assessment Commission (March 2011). Subsequent amendments to the project approval have occurred under section 75W. The project is classified as 'transitional' under recent amendments to Part 3A and remains with the Department as consent authority.

Attachment 1 is a chronological account of the assessments, approvals and consent modifications that have occurred thus far, providing an up-to-date record of the additional floorspace that has been approved/provided at SAH since the initial concept approval was issued. The account also provides commentary on the number of parking spaces provided or adjusted with each approval/modification that has been issued.

Background

At the concept plan approval stage it was initially estimated that the existing floorspace of SAH was 66,000m². This figure became the base from which additional development was assessed. It contributes to the total allocation of floorspace eventually allowed for the hospital component of works within the overall site redevelopment (i.e. 94,000m², comprising 66,000m² of existing floorspace and 28,000m² of additional floorspace).

Although subsequent assessments identified the existing hospital floorspace as 58,448m², the concept plan approval remains unchanged and establishes an allowable floorspace cap of 94,000m². This amount is reinforced by the SEPP Amendment which sets a similar floorspace allowance for this component of the project.

This current S75W modification request therefore seeks to confirm the allowable floorspace at this number (94,000m²), allowing for an 'extra' 7,552m² of floorspace to be redistributed across the site, (i.e. 66,000m² assumed less 58,448m² actual = 7,552m² extra floorspace allowable in addition to the approved additional 28,000m²).

There are essentially two aspects of the requested floor space reallocation that need to be considered in a planning sense:

1. the traffic and parking implications of the floorspace adjustment; and
2. the possible visual impact of the redistributed floorspace within the hospital precinct.

These issues are dealt with separately below.

A concurrent S75W request seeks to allocate 3,950m² of the reclaimed floorspace toward an extended Education Facility, leaving 3,550m² to be accounted for in other hospital works.

Impact of Current Proposal – Traffic & Parking

At the concept plan approval stage (March 2010) the external traffic implications of the SAH redevelopment project were considered firstly to gauge the overall impact of site development and, secondly, to frame consent conditions relating to internal parking provisions, car share arrangements and external roadworks deemed necessary to absorb additional traffic loads.

At the time, traffic assessments were based on actual traffic movements and the parking demands of the existing hospital/church/school development, taking into consideration anticipated growth in hospital activity and the expected additional traffic volumes associated with other non-hospital uses.

Having regard for the unique peculiarities of the site (hospital traffic loads occurring in shifts, potential car share and public transport arrangements etc) the concept approval required a range of external roadworks and set nominated parking requirements for the residential components of the planned new development.

The external roadworks largely involve:

- Upgrading of the intersections of The Comenarra Parkway / Fox Valley Road and of Fox Valley Road / Pacific Highway
- Upgrading of the principle site access on Fox Valley Road
- Provision of 2 traffic lanes in each direction along Fox Valley Road

The external roadworks have been the subject of ongoing discussions between the Roads & Maritime Services (RMS), the Department of Planning & Infrastructure (DP&I) and the developer. It has now been determined that works initially intended for the intersection of The Comenarra Parkway/ Kissing Point Road are no longer required and clarity has been provided as to the timing of roadworks. A legal agreement will confirm the extent of roadworks and their timing.

To determine the appropriateness of this MOD 3 request from a traffic and parking perspective it is necessary to consider the sequence of traffic and parking assessments that have been undertaken for the site, encompassing both the concept and project approvals that have been issued. A chronology of assessments and approvals is provided at **Attachment 1**.

We note that at the final concept approval stage when the total residential yield across the estate was limited to 500 dwellings, the accepted traffic advice was that “the reduction in new dwelling numbers from 690 to 500 would result in a reduction of peak hour traffic generation for the site of 91 vehicles per hour” and that “the total traffic generation change for this site would be down from 985

to 894 during peak hour.” The advice concluded that the omission of 190 residential units would not materially change expected traffic conditions nor result in any lesser need for intersection or external road improvements beyond that which were already recognised (and subsequently factored into the concept approval).

The initial concept approval and associated required roadworks therefore have been based on a slight overestimation of site uses, allowing some ‘slack’ for the individual assessment of particular uses within the estate and further justifying the modest variation from Council DCP parking standards that was allowed for defined uses at the time of the concept approval.

The subsequent project approval (MP 10_0070) for hospital precinct works incorporated an additional 750 car parking spaces across the hospital campus, providing for a total of 2,058 spaces within this part of the Wahroonga estate. This number of parking spaces remains the basis of provision within the hospital precinct. It remained unaffected by the first two modifications and increased slightly with the initial design modification request for the education facility (MOD 3). It will be adjusted again to accommodate proposed further design changes to the education facility (see separate modification request).

Currently the education centre is proposed to be increased in size to 7,450m², arising from new funding becoming available and an increased interest in the operation of the facility by Sydney University. It is now proposed that 40 parking spaces will be provided for this facility, involving spaces at-grade and a new provision for 14 underground spaces. This represents an increase from the 9 spaces allocated under the approved Project Approval plans, which was initially justified on the basis that users of the facility would largely be on-site resident nurses and doctors. The development remains adjacent to the proposed student residential quarters, reinforcing the likely shared arrangements between these uses.

We note also that excess parking is now proposed for the student accommodation component of development (i.e. above the parking rates nominated at the original concept plan approval stage). An additional 32 spaces have been allocated for this use.

Finally we note that the original concept approval allows for 13,000m² of floorspace for student accommodation within the Central Hospital Precinct but that the final plans for this use provide a GFA of only 6,759m², representing a decrease in approved floorspace. We further note that current plans for the residential accommodation within the Central Hospital Precinct propose to separate service traffic from resident vehicles, resulting in improved traffic performance.

The combined effect of these occurrences is to reinforce the over-estimation of traffic numbers expected to be generated at the site and already incorporated into the concept approval conditions.

The potential traffic and parking impact of the reallocated floorspace is negated by the reduction in floorspace that has occurred for other components of the project and through improved parking arrangements for individual uses.

Impact of Current Proposal – Building Form

The remaining issue relates to the potential visual impact of accommodating an additional 3,550m² of floorspace within the Central Hospital Precinct.

As discussed above, we note that other components of work within the precinct (i.e. student accommodation) will incur a reduction in total floorspace, therefore balancing out any possible impact of floorspace redistribution.

We also note that the majority of remaining stages of development within the precinct are internal facing and could absorb additional floorspace without direct visual impact on neighbouring land uses. We also note that the concept plan approval relates to development on both sides of Fox Valley Road such that the visual impact of on-site development is essentially internalised within the project.

It is not possible at this stage to nominate which buildings will absorb the additional floorspace although it is likely to be within the approved rebuilding of the Shannon wing which sits well within the site boundaries.

We further note that the existing SEPP Amendment incorporates appropriate height and maximum floorspace settings and that this S75W request does not seek to alter these specifications. Accordingly we suggest that the additional floorspace will be appropriately traded off with other buildings within the precinct but remain within the building envelope settings that have already been established for the site. It follows that no further consideration or control of building impact is necessary.

Please find attached to this letter an amended version of the Concept Plan instrument (indicating relevant track-changes). We seek that these changes made to the Concept Plan instrument be amended to reflect the anomaly in hospital floorspace, which is consistent with the justification provided above.

Should further explanation of this request be required please do not hesitate to contact our office. We have architectural drawings that support our case for floorspace adjustment that we would like to discuss with you further.

Yours sincerely,



Wayne Gersbach
General Manager – NSW

ATTACHMENT 1 – CHRONOLOGY OF ASSESSMENTS, APPROVALS & MODIFICATIONS

1. SEPP (Major Development) 2005

In December 2009, the Wahroonga Estate was declared a State Significant Site. The accompanying SEPP (Major Development) 2005 Amendment incorporates a range of zoning and other development 'maps'.

The Gross Floor Area Map depicts the Central Hospital Precinct (as defined under the Concept Plan) as having an allowable GFA of 115,000m².

The 115,000m² floor space allowance is consistent with the subsequent Concept Approval which allocates the following floorspace provisions across described uses:

- 94,000m² hospital and facilities
- 13,000m² student accommodation
- 1,500m² hostels/group homes/boarding houses
- 3,500m² Faculty of Nursing
- 2,000m² retail
- 1,000m² commercial

2. Final Preferred Project Report and Concept Plan (January 2010)

The Final Preferred Project Report and Concept Plan estimated the size of the existing hospital to be 66,000m² and accounted for an additional 28,000m² of hospital-related floorspace. Accordingly, the concept plan application estimated the total post-approval floorspace of the hospital to be 94,000m².

Other development outside the 94,000m² hospital space was also proposed for the hospital precinct in addition to a range of development within other precincts. For the whole of the site the Final Preferred Project Report adjusted its provision of proposed new dwellings to 500 in accordance with the gazetted SEPP.

A total of 1,394 car parking spaces (including 250 on street spaces) were suggested for non-hospital components of the project.

3. Concept Approval (March 2010)

The Concept Approval specifically describes the various land uses and their respective total and individual floor areas on a precinct basis for the whole of site development.

Whilst a total floorspace of 94,000m² for the hospital works was nominated, the Concept Approval also described the project as involving an additional 28,000m² of hospital floor space.

The Concept Approval followed the completion of the Director General's Major Project Assessment (January 2010) which also refers to a total hospital floorspace of 94,000m².

The DG's assessment found the overall scale of the proposed development to be appropriate and noted the provision of 1,671 car parking spaces (including 250 on-street spaces) for the non-hospital components of the project, representing a slight increase in the number suggested in the Final Preferred Project Report.

The floorspace breakdown stipulated in the Concept Approval is:

Precinct	Maximum Gross Floor Area (m ²) (excluding dwellings)	Maximum Gross Floor Area (m ²) by land uses
Precinct A: Mount Pleasant	17,700m ²	17,700m ² seniors housing
Precinct B: Central Church	12,200m ²	9,000m ² education 3,200m ² place of public worship
Precinct C: Central Hospital	115,000m ²	94,000m² hospital and facilities 13,000m ² student accommodation 1,500m ² hostels/group homes/ boarding houses 3,500m ² Faculty of Nursing 2,000m ² Retail 1,000m ² Commercial
Precinct D: Fox Valley	15,000m ²	15,000m ² Commercial
Precinct E: Residential East	N/A	

Source: Concept Plan Approval - Wairoa Estate (March 2010);

4. Preferred Project Report for Hospital Works (November 2010)

This report documents the proposed first stage of development within the Wairoa Estate, being a range of hospital and related projects located within the Central Hospital Precinct.

The application proposed an additional 27,993m² of hospital floorspace, consistent with the additional 28,000m² described in the Concept Approval. According to the application, this additional floorspace equates to a total floorspace for the hospital of 86,441m², meaning that the total development is well within the 94,000m² cap specified by the Concept Approval and SEPP Amendment.

5. Project Approval for Hospital Works - MP 10_0070 (March 2011)

The Project Approval approved the following works:

- Staged expansion and refurbishment of the Clinical Services Building,
- Refurbishment of existing hospital buildings,
- Construction of a 3-4 storey Education Centre,
- Demolition and construction of a new Shannon Wing,
- Relocation of Bethel House and Memorial Fountain to create the Merritt Kellogg Museum,
- Multi-level carpark for 922 spaces,
- Expanded at-grade staff carparks for an additional 86 spaces,
- Temporary carpark for 258 cars during construction,
- New entry to hospital,
- New perimeter road around multi-level carpark, to connect to existing access road, and
- New and upgraded landscaping.

The approved hospital works provided an additional 750 on-site carparking spaces, increasing the total parking provision from 1,308 existing spaces to 2,058 total proposed spaces. A new multi-deck

carpark replaced an existing at-grade car park at the rear of the site, resulting in a net gain of 561 permanent spaces. A further 86 at-grade spaces were proposed around the site and a further 206 spaces were to be provided with the rebuild of the Shannon Wing, with some other adjustments made to existing at-grade parking areas.

A temporary carpark of 258 spaces was also proposed to address car parking spaces displaced during the construction program.

The DG's assessment (February 2011) that immediately preceded the Project Approval noted that the proposed additional floorspace was consistent with that described in the Concept Approval and was within the 94,000m² cap set by SEPP Amendment. It did not, however, seek to redress the overstated 66,000m² floorspace that initially informed the concept plan application. The Project Approval confirmed the floor area of the existing hospital as 58,448m². The gazetted SEPP remains unchanged and continues to allow a total floorspace of 115,000m² for the hospital precinct (based on an allowable 94,000m² for hospital works themselves).

6. Project Modifications

There has been a series of approved project approval modifications relating to the progression of works on the hospital site. These have mainly been to address changes in plan details as the project moves from concept to construction stage. The nature and implications of these modifications are briefly explained below.

- **Modification 1 – Hospital Entrance Building, Parking Amendments & Staging of Works (MOD 1)**

This 75W modification sought:

- Modification of the temporary carpark layout to provide 413 car spaces
- Reconfiguration of the western at-grade carpark to provide 84 car spaces (instead of 86)
- Alteration to the design and layout of the multi-deck carpark and arrival podium to provide for 896 car spaces
- Revised treatment of building entry to better integrate with the new carpark and hospital components

Through adjustments in the on-site provision of parking, the modification did not alter the total number of permanent spaces proposed for the site. 2,058 spaces in total were to be provided, as specified in the original project approval.

The modification resulted in an actual reduction in floorspace owing to the 'opening up' of the entry building. Although the floorspace of the concourse was reduced from 413m² to 60m² the application suggested the reallocation of floorspace within other latter stages of development in keeping with the approved 28,000m² additional floorspace limit. This limit was reflected in the modification approval conditions.

The proposed modification to the project approval [is to] remain consistent with the Wahroonga Estate Concept Plan controls for the hospital precinct. The concept plan provides the SAH hospital site with a maximum building height of 39.5m and a maximum additional floor space of 28,000m² (providing a total of up to 94,000m²).

MOD 1 was approved in December 2011.

- **Modification 2 – Clinical Services Building (MOD 2)**

This proposal sought design changes to the Clinical Services Building (CSB) involving:

- Changes to the shape and footprint of the building to form an 'L' shaped layout to support operational efficiencies
- An increase in the gross floor area of the CSB of 957m² to a new total 19,775m²
- An adjustment of building height by 3.5 metres due to an increase in plant and storage areas, resulting in 3.3 metre variation over the height control.

The adjustment in floorspace for the CBS building was accounted for in a slight decrease in proposed floorspace for the Shannon building, keeping the total floorspace still within the 28,000m² allowed. The total adjusted floorspace was 27,368m², down from the original 27,993m² at the time of the original Project Approval. A 27 at-grade carpark was originally submitted as part of the MOD 2 request, but was subsequently removed from the application.

MOD 2 was approved in April 2012.

- **Modification 3 – Education Centre (MOD 3)**

This request sought a revision in the design of the education facility and the provision of additional parking for this facility. The floor space of the facility remained as per initially proposed (just shy of the 3,500m² approved under the Concept Plan Approval).

Provision for 119 car spaces was originally allocated for the education facility use under the Concept Approval however approved Project Approval plans incorporated only 9 spaces for this facility on account of its likely shared use between on-site student residents and doctors. MOD 3 sought to redress this parking provision by incorporating 43 spaces to meet both lecturer and administration staff needs, whilst still allowing for an 'overlap' of student parking needs between the education facility and residential accommodation proposed to be provided adjacent to the site.

MOD 3 was approved in June 2012.