

# Wahroonga Estate Redevelopment

Incorporating Sydney Adventist Hospital

Final Preferred Project Report & Concept Plan

January 2010



JOHNSON PROPERTY GROUP  
Creating living communities

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**Statement of Validity**

Submission of Final Preferred Project Report:


Prepared under Part 3A of the Environmental Planning and Assessment Act 1979.

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Certification:

We certify that we have prepared the contents of the Preferred Project Report and to the best of our knowledge; the information contained in this report is neither false nor misleading.

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- Appendix C** Land Owner's Consent
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- Appendix L** Bushfire Protection Assessment
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- Appendix N** Ecologically Sustainable Development Review
- Appendix O** Geotechnical Assessment
- Appendix P** Phase 1 Contamination Assessment
- Appendix Q** Civil Engineering Utilities Report
- Appendix R** Stormwater Management Master Plan

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## EXECUTIVE SUMMARY

This Preferred Project Report and Concept Plan is submitted on behalf of the proponent Johnson Property Group (JPG) and the property owner Australasian Conference Association Limited (ACA) to the Minister of Planning for approval under Part 3A of the Environmental Planning and Assessment Act, 1979. It relates to the redevelopment of the Wahroonga Estate - Comenarra Park Living Community at the intersection of Fox Valley Road and Comenarra Parkway, Wahroonga.

The proposal is for the comprehensive redevelopment of the Wahroonga Estate, incorporating the Sydney Adventist Hospital, to accommodate the expansion of the Hospital together with the provision of new educational and community facilities, residential dwellings (for both private residents and employees within Wahroonga Estate) and a small village centre. The concept plan seeks approval for the use of the site and broad development parameters including building envelope and yield. As the application is for a Concept Plan, detailed site operation, design and elevation details will be provided with the subsequent Project Applications.

The original proposal included an application for listing the site as State Significant. This application has been recently approved by the Minister. The listing includes:

- Zoning of the Estate to include a retention of a core and Special Activities zone for the hospital and related uses and accommodation
- High density residential precinct adjacent to Fox Valley Road and low and medium density zones relating to other existing residential areas
- Neighbourhood centre scale retail and commercial uses to support the precinct
- The remainder of the site zoned for the purposes of Environmental Conservation
- A maximum of 500 dwellings
- Heights ranging between 9.5m and 39.5m across the site

### An existing specialised centre and major employment generator

The site exists as one of the major health care employment hubs in Sydney and is recognised as such in the North Sub-Regional Strategy. There is a prescribed objective to strengthen this employment hub and its role as specialised educational and medical infrastructure, however, the estate is not formerly marked as a Specialist Centre on the strategy map. The ACA Wahroonga Estate features an amalgam of health related uses including the Hospital, associated clinics, the ACA administration and media centre, a relief agency, churches, a primary school, a retirement village and associated staff housing.

The Sydney Adventist Hospital is a not-for-profit, acute care private hospital licensed by the New South Wales Department of Health for 342 beds, making it the largest single campus private hospital in NSW. It was the first private hospital in NSW to be accredited by the Australian Council on Healthcare standards. ([www.sah.org.au](http://www.sah.org.au))

It is the largest single employer in the Hornsby/Ku-ring-gai Council areas and the third largest health-based employer in the northern region. The hospital employs approximately 2,200 staff and has 500 accredited medical practitioners. They care for more than 40,000 in-patients and 150,000 out-patients annually. There is also additional non-health related staff in the Primary School and the ACA administrative and media centre. ([www.sah.org.au](http://www.sah.org.au))

In addition to its role as a specialised employment hub, the site is considered to be of State Significance for the following reasons:

- The site exists as a significant living working community and represents an excellent example of planning to reduce dependency of car related travel. Proper planning of an expanded specialised centre will have further benefits in reducing reliance on car travel in the region.
- Over 1000 operational jobs will be created in the short term: over the next five years. An additional 3000 to 5000 operational jobs will be generated over the medium term expansion phase. Over the course of the construction program the equivalent of 11,000 jobs will be created.
- The concentration of health related education and research facilities within the hospital precinct will have operational synergies and infrastructure savings in accordance with government policy objectives.
- The overall improvement of the existing facility accords with a key priority of the NSW State Plan to *'improve access to quality health care'*.
- The development proposal is complex and costly with potential wider impacts on the settlement policies of the two local Council areas.
- The proponent contends that the Hospital's status as a specialised employment centre should be acknowledged in the context of the North Sub-Regional Strategy. As a result it is proposed that the urban design objectives prepared for other town centres should be applied to the site. It is noted that the Estate will not have any significant retail development that might compete with other existing town centres and the overall retail hierarchy.
- The fact that the Estate has been overlooked in the Sub-Regional Strategy as a specialised centre is perhaps symptomatic of potential conflicting interests, as illustrated in the context of previous residential and seniors living development proposals which have previously been addressed at local government level. To avoid any impasse, it is considered that alternative arrangements are warranted.
- The proposal includes increases in residential densities that require planning at a regional level to ensure implications are addressed appropriately.
- Replacement of the existing nurses' hostel accommodation and construction of a dedicated facility for the Faculty of Nursing, are to occur as a matter of urgency, therefore the time efficiencies offered by the Part 3A assessment process will be beneficial.

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## The impetus for redevelopment

It is the intention of the ACA that the Sydney Adventist Hospital, its associated community facilities and residential accommodation be expanded and upgraded. The hospital itself is intended to grow from the existing 66,000m<sup>2</sup>, by an additional 28,000m<sup>2</sup> at an estimated cost of \$357.6 million.

Coupled with the expansion of this important employment hub, the overall development of the site is proposed. The extent of works could not be achieved without this comprehensive development approach.

The necessity and urgency of undertaking the residential component of the development is due to the substandard nature of the existing housing on the Estate. The master planned redevelopment of the site will ensure that accommodation is provided to match the standard of the future hospital expansion and provide affordable housing options within the Estate for key health workers and other staff employed on site in non-health related functions of the Church.

## The proposed Concept Plan – in brief

The proposed Concept Plan includes an upgrade and expansion of the existing hospital and associated facilities including the provision of housing. **Table 1** below summarises the features of the proposal:

Type of use	Existing development	Proposed development	Precinct
Hospital	<p>Sydney Adventist Hospital and facilities – 66,000m<sup>2</sup></p> <ul style="list-style-type: none"> <li>Inpatient beds – 345 beds</li> <li>Intensive care unit – 12 beds</li> <li>Coronary care unit – 11 beds</li> <li>Day beds – 96 beds</li> <li>Renal dialysis chairs – 14</li> <li>Birthing – 8 suites</li> <li>Cardiac catheter laboratory – 3</li> <li>Endoscopy theatres – 2</li> <li>Operating theatres – 12</li> <li>Clinical activities including dental care</li> <li>Faculty of Nursing including auditorium, conference space and library</li> <li>Australasian research unit</li> <li>Nurses residence</li> <li>Child care centre</li> <li>Chapel</li> <li>Staff cafeteria</li> <li>Staff amenities including swimming pool</li> </ul>	<p>Upgrade and expand existing facilities over the short to medium term by an additional 28,000m<sup>2</sup> – 94,000m<sup>2</sup> in total.</p> <p>Details to be subject of a separate application to follow Concept Plan Approval.</p> <p>Faculty of Nursing to be expanded to 3,500m<sup>2</sup> and relocated to a dedicated facility within the Central Precinct</p>	Central Hospital
Church	Two churches totalling 1,600m <sup>2</sup>	A centralised church precinct catering for 3,200m <sup>2</sup> floor space	Central Church
Education	Primary school of approx. 1,200m <sup>2</sup> and catering for approx. 200 students	Allowance for a K-12 school of 9,000m <sup>2</sup> relocated to Central Church Precinct and catering for approx. 800 students	Central Church
Commercial	8,000m <sup>2</sup> housing Pacific Regional Headquarters of the SDA Church, Media Network Centre and other administrative functions	<p>10,000m<sup>2</sup> to maintain existing functions and allow for limited expansion of existing and/or additional functions</p> <p>Allowance for some new commercial up to 6,000m<sup>2</sup> (eg. professional consulting rooms) in proposed village centre – Central Precinct.</p>	Fox Valley

Type of use	Existing development	Proposed development	Precinct
Residential	Dwelling houses – 68 Dual Occupancy - 1	<ul style="list-style-type: none"> <li>42 in total</li> <li>39 dwellings to be retained, refurbished or replaced</li> <li>3 new dwelling houses proposed</li> </ul>	<p>Mt Pleasant – 16</p> <p>Central Church – 9</p> <p>Central Hospital – 3</p> <p>Fox Valley – 8</p> <p>Res East – 6</p>
	Student style – 240 student beds	<ul style="list-style-type: none"> <li>90 studios</li> <li>11 x 1 bedroom</li> <li>200 student / hostel rooms</li> </ul>	Central Hospital
	Jacaranda Lodge - 30 rooms Mission Hostel - 17 rooms Ladies Hostel - 6 units	<ul style="list-style-type: none"> <li>Jacaranda to be refurbished – 30 rooms</li> <li>Mission to be relocated – 12 rooms</li> </ul>	Central Hospital
	Medium density (town houses) - nil	<ul style="list-style-type: none"> <li>38 in total</li> </ul>	Mt Pleasant – 38
	High density (residential flat buildings) - nil	<ul style="list-style-type: none"> <li>420 in total</li> <li>105 x 1 bedroom</li> <li>211 x 2 bedroom</li> <li>104 x 3 bedroom</li> </ul>	<p>Mt Pleasant – 27</p> <p>Central Church – 200</p> <p>Central Hospital – 105</p> <p>Fox Valley – 88</p>
	Retirement living – nursing home 27 beds, retirement 50 units, hostel 69 rooms	<ul style="list-style-type: none"> <li>104 bed hostel</li> <li>41 bed nursing home</li> <li>50 aged units</li> </ul>	Mount Pleasant
		Total – 500 dwellings and 538 bed hostel/ student/aged	
Retail	Minor retail (hospital support services including pharmacy, book store, San cafe) 1,000m <sup>2</sup> located in hospital precinct.	A total of 2,000m <sup>2</sup> of neighbourhood retail, that may include transferral of existing retail within the hospital building	Central Hospital
Open space, recreation and conservation	Informal use of undeveloped areas and existing bushland (privately owned land)	Approx 31.4ha land to be zoned Environmental Conservation with improved public access and management. Clearly defined active and passive recreation areas throughout development precincts.	All

Table 2: Key Development Parameters

Dwelling Mix	Houses 42
	Townhouses 38
	1 bed apartments 105
	2 bed apartments 211
	3 bed apartments 104
	Hostel beds 42
	Aged Units 195
Student Style Accommodation / Staff 301	
	TOTAL Dwellings: 1038
Dwelling per Ha	16.6 dwellings per ha
Residential Population	1494

## Environmental Considerations

The proposed density of development is considered to be within the environmental capacity of the Estate and consistent with the density expectations mooted in NSW Government policy. In terms of environmental capacity, the proposed development has been ostensibly contained to within the existing cleared curtilage of the Estate.

The site exists as an excellent example of living and working in place. The proposal contains a number of unique features that will ensure that the Estate remains a leading example of a living and working community that reduces car dependence, including:

- An innovative car sharing scheme which is funded through levies applied to medium and high density residential dwellings. This scheme will result in lower traffic generation, reduced parking demand and lesser environmental impact than a typical residential development.
- Encouraging the housing throughout the Estate to be leased by people associated with the site. This will be done through the creation of appropriate ownership and titling arrangements that establish conditions to ensure affordable rentals to make Estate housing attractive for students and staff. Such measures may include retention of ownership by the Church, extended lease arrangements, or restrictions on title.
- The provision of a well planned Estate that incorporates a comprehensive range of social services and facilities.

In relation to other environmental considerations the following comments can be made:

- A traffic report has been undertaken by Halcrow Masson Wilson Twiney which reveals that the capacity of the road system is adequate for the proposed development subject to necessary upgrades. In addition a draft TMAP (Transport Management and Accessibility Plan) has been prepared which included a study of the existing users of the site and makes recommendations to promote modal shift toward public transport.
- The proposed concept plan includes the designation of transitional residential precincts adjacent to existing residential development. The scale, density and character of these precincts relate sensitively with that of the adjoining residential areas.
- A flora and fauna report finds that certain threatened species and communities and migratory species have been found or are suspected to occur on site. An application for a 'controlled action' has been made to the Commonwealth under the Environmental Protection and Biodiversity Conservation Act 1999. The concept plan has been designed to ensure minimal impact upon these listed communities and contains recommendations and commitments to mitigation and management.
- The site contains Category 1 bushfire prone land. A comprehensive bushfire report has been prepared, including consultation with the RFS, and measures have been recommended to ensure appropriate setbacks and management of vegetation buffers and compliance with Planning for Bushfire Protection 2006.
- There is only one building of European heritage significance and this building is to be retained. Measures to ensure other contributory and potential archaeological features are appropriately dealt with have been included in the heritage assessment.
- The proposal is considered to have positive social and economic benefits, as it will improve residential amenities for employees who live on site as well as stimulate employment on site.
- An investigation of the existing infrastructure has revealed that the site is currently serviced by all utilities and appropriate arrangements can be made to upgrade existing services to meet the need of the expanded Estate.
- A site assessment has been undertaken and subject to adoption of the recommended measures there is no risk of contamination hazard and any contamination will be remediated to the appropriate level.
- A detailed stormwater and drainage plan has been prepared and incorporates provision of water quality retention and treatment in accordance with industry best practice.
- The proposal incorporates a number of ESD measures and commitments to ensure best practice sustainable design is implemented.

## Conclusion

In summary, the Preferred Concept Plan has been amended to accord with the parameters established in the recently gazetted SSS listing for the Estate. It is recommended that the concept plan be approved as amended.



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# 1 INTRODUCTION

## 1.1 Application format

This application has been prepared on behalf of Johnson Property Group for the development of the site known as Wahroonga Estate, incorporating the Sydney Adventist Hospital.

This application is submitted to the NSW Department of Planning (DoP) in the form of a Concept Plan Application in accordance with Part 3A of the Environmental Planning and Assessment (EP&A) Act, 1979 for the proposed redevelopment of the Wahroonga Estate. Full details of the proposal are provided in Section 6 of the report.

This application is supported by **one volume** of supporting documentation and plans.

## 1.2 Background

The progress to date of this proposal is listed below:

- A 'Clause 6 request' was submitted to the Department of Planning on 19 September 2007.
- The Minister declared the proposal a Major Project, in accordance with Clause 6 of the Major Project SEPP on 12 December 2007, refer to correspondence at **Appendix B**.
- A Preliminary Environmental Assessment was submitted to the Department of Planning seeking the Director General's Environmental Assessment Requirements.
- The Director General's Environmental Assessment Requirements were issued on 9 April 2008, forming the basis for the content within this application, refer to **Appendix D**.
- An application for a 'controlled action' has been made to the Commonwealth under the Environmental Protection and Biodiversity Conservation Act 1999 and the proposal declared a control action in a formal response from the DEWHA on 5 November 2008.
- The SSS listing for the Estate was gazetted on 18 December 2009.

## 1.3 Vision for the site

It is the intention of the ACA that the Wahroonga Estate incorporating the Sydney Adventist Hospital, community facilities and residential accommodation be expanded and upgraded. The hospital itself is intended to grow from the existing 66,000m<sup>2</sup>, by an additional 28,000m<sup>2</sup> in the short to medium term.

Coupled with the expansion of this important employment hub, the overall development of the site is proposed. As can be appreciated upon examination of the cost estimates provided by Page Kirkland (see **Appendix E**), the upgrade and expansion of the hospital is significant at \$357.6 million. The extent of works for the future expansion could not be achieved without this comprehensive development approach.

The necessity and urgency of undertaking the residential component of the development is due to the substandard nature of the existing housing on the Estate. The master planned redevelopment of the site will ensure that accommodation is provided to match the standard of the future hospital expansion.

The vision for the Wahroonga Estate site is encapsulated in the following statement:

***The Wahroonga Estate will become a vibrant, mixed-use, sustainable community based on best practice environmental, water management and urban design principles centred around an improved and expanded Sydney Adventist Hospital, which will deliver:***

- ***Improved health care services.***
- ***Significant health-related employment opportunities.***
- ***New educational facilities including a school and Nursing College.***
- ***A range of medium to high density residential accommodation for health workers and the local community.***
- ***A small village retail centre.***
- ***Protected and enhanced conservation corridors with extensive passive recreational opportunities.***
- ***Linkages to an integrated transportation network.***
- ***On-site stormwater management and re-use system.***

## 1.4 Project value

Capital investment value (CIV) is defined in the State Environmental Planning Policy (Major Projects) 2005 (Major Projects SEPP) as:

The capital investment value of development includes all costs necessary to establish and operate the development, including the design and construction of buildings, structures, associated infrastructure and fixed or mobile plant and equipment (but excluding land costs).

The CIV of the exhibited Concept Plan was \$786.23 million. This CIV value has been reduced to \$573.31 million as a result of the modifications made to this Concept Plan following the exhibition of the original plan and the development controls placed on the estate via the recent gazettal of *State Environmental Planning Policy (Major Development) Amendment (Wahroonga Estate) 2009*.

## 1.5 Proponent and the consultant team

Johnson Property Group is the project client. The following consultants have been appointed to prepare documentation supporting the Concept Plan:

- Urbis – Planning & Urban Design.
- Australian Bushfire Protection Planners – Bushfire.
- Australian Museum Business Services – Heritage & Archaeology.
- Cumberland Ecology – Ecology.
- Douglas Partners – Geotechnical Engineering and Contamination.
- Hill PDA – Social & Economic Analysis.
- Hyder Consulting – Civil Engineering and Utilities Analysis.
- Halcrow MWT – Transport, Traffic & Parking.
- Page Kirkland – Quantity Survey.

Figure 1 – The Proponent



Figure 2 – The Consultant Team



## 2 THE RECEIVING ENVIRONMENT

### 2.1 Regional Context

The location of the Wahroonga Estate site is illustrated in **Figure 3** below. The site is approximately 18km north-west of the Sydney CBD, and is located 1km south of where the Pacific Highway and Pennant Hills Road meet with the F3 Freeway. The majority of the site is in Ku-ring-gai LGA, with a small portion of the site located in the Hornsby LGA.

The Wahroonga Estate is located on two main through roads that link the centre in a regional sense to the surrounding town centres. The Comenarra Parkway links the site to Pennant Hills Road directly to the west upon which the closest township of Thornleigh is located, approximately one kilometre away. A bus service links the rail stations of Hornsby and Thornleigh with the site via the Comenarra Parkway.

Fox Valley Road links the site with the Pacific Highway and the railway stations of Warawee and Turramurra. A bus service links the site with Turramurra Station and has good public transport accessibility via bus, cycling or extended walk, to a number of other rail stations.

Important employment/education and medical infrastructure hubs in the region include the Hornsby TAFE and Hornsby Hospital. Together with Hospital, these hubs are recognised as important in terms of providing employment for the region and the State.

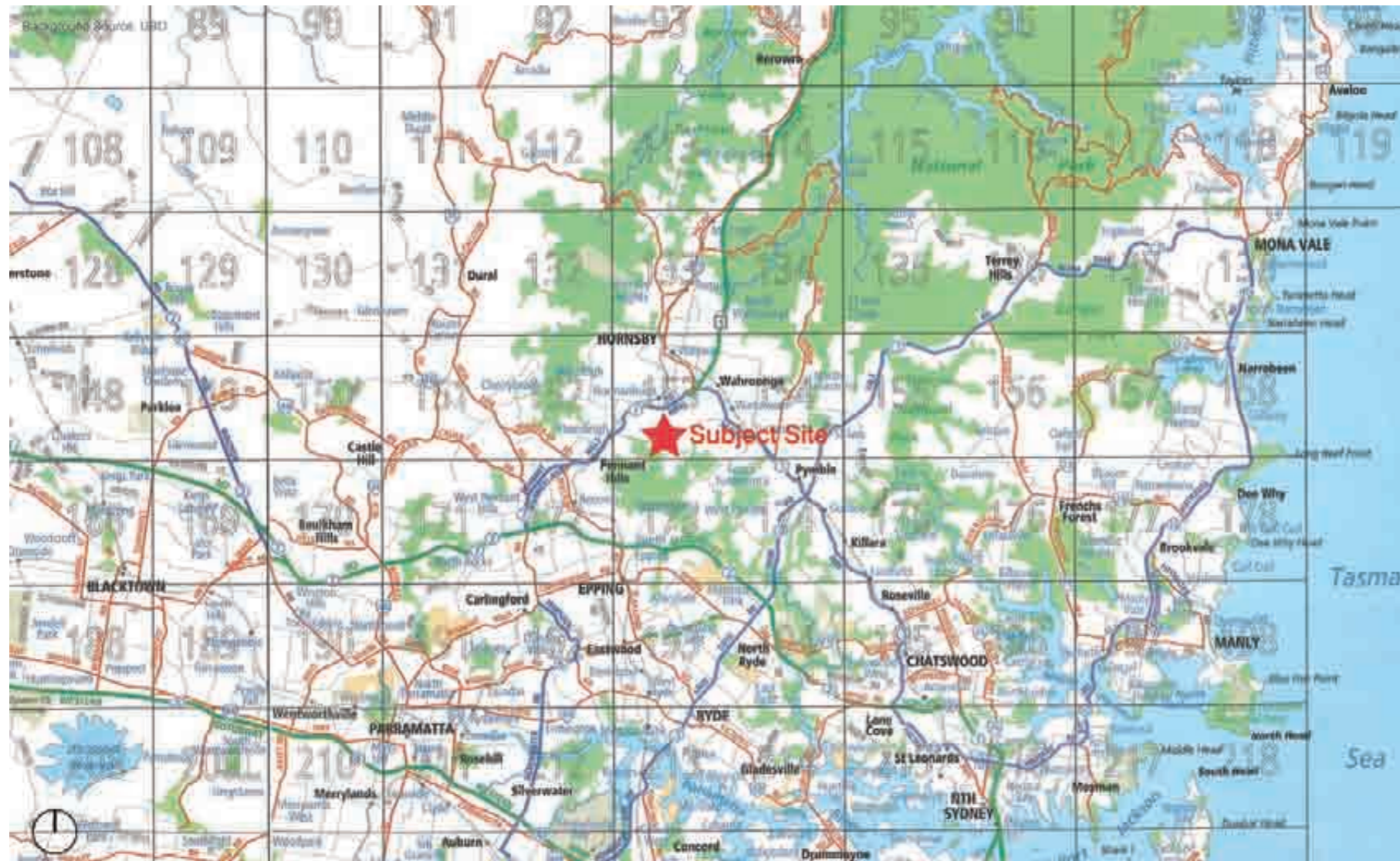


Figure 3 – Site Location

## 2.2 Surrounding Land Use

To the north, east and west of the site, the suburbs of Thornleigh, Normanhurst and Wahroonga/Warrawee, respectively, typify the existing built form context – predominately large single lot residential dwellings with extensive gardens with some recent medium/high density sites emerging, particularly at key centres and along the Pacific Highway.

To the south of the site lies the Lane Cove National Park. The park separates the south western portion of the site from the nearby suburbs of Roseville, Pennant Hills, North Epping and South Turramurra. The physical context of the site is illustrated in **Figure 4**.

Much of the surrounding development is buffered by urban bushland. The Estate directly adjoins surrounding development in three locations: along Fox Valley Road to the north-east, north of Mt Pleasant Avenue in the north-west and on the opposite side of Comenarra Parkway to the south. All of the adjoining development can be described as low density residential. The only exception relates to a small Fox Valley retail centre at the corner of Comenarra Parkway and Fox Valley Road.



Figure 4 – Site Context

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## 2.3 The Site

The Wahroonga Estate, as shown in **Figure 4**, is located in the suburbs of Wahroonga and Normanhurst, astride the boundary of Ku-ring-gai and Hornsby Local Government Areas (LGA). The majority of the approximately 62.4 hectare site is within Ku-ring-gai LGA with only a small number of residential properties on the north-western section of the site in the Hornsby LGA. It comprises fifty nine (59) separate property titles managed by the Australasian Conference Association, as property trustees of the Seventh Day Adventist Church, and two (2) titles in private ownership. A list of titles is included at **Appendix F** of this report.

Access to the site is from Fox Valley Road (via the Pacific Highway) or the Comenarra Parkway (via Pennant Hills or Kissing Point Roads). The Comenarra Parkway adjoins the southern boundary of the Estate while Fox Valley Road dissects it in a north-south direction.

In a broader context the site is approximately 2.2km to the east of Thornleigh Railway Station, 3km to the west of Turramurra Railway Station and 1.5km to the south of Normanhurst Railway Station. Loreto Normanhurst Catholic School is located north of the site and a neighbourhood retail centre is south of the intersection of the Comenarra Parkway and Fox Valley Road. The Estate includes a mix of residential, open space and special use land uses.

Fox Valley Road runs along a ridge through the middle of the site and the land falls away either side to Coups Creek in the west and Fox Valley Creek in the east, both of which are tributaries of the Lane Cove River. The Coups Creek corridor cuts through the site from the north-east to the south-west almost parallel to Fox Valley Road. As a result, the Estate is effectively divided into three distinct sections with the Mount Pleasant precinct west of Coups Creek; a central precinct between Coups Creek and Fox Valley Road; and a third precinct east of Fox Valley Road. Site elevation varies between 130 and 170 metres Australian Height Datum (AHD). Slopes within the riparian corridors generally exceed 18° while slopes outside of the riparian corridors are generally 0 – 10°.

Existing development includes residential, aged care and retirement accommodation in the Mt Pleasant precinct; core hospital development, a school, churches, residential accommodation and parking within the central precinct; and commercial and residential development to the east of Fox Valley Road. The remainder of the site, approximately 40%, comprises open space and bushland ranging from managed landscaped gardens and open mown lawns to remnant urban bushland along riparian corridors and in the eastern portion of the Estate. Of particular note the Coups Creek riparian corridor links across the Comenarra Parkway to Lane Cove National Park in the south and extends north of the site along the creek and between existing residential development.

The surrounding land use, topography and vegetation effectively screen views both to and from the site and the bulk of the existing hospital building is really only evident when viewed from Mt Pleasant Avenue or in close proximity to the site travelling along either Fox Valley Road or the Comenarra Parkway. This blend of site characteristics delivers a range of opportunities and constraints that have guided the design evolution and shaped the concept plan proposal for the Wahroonga Estate.

## 2.4 Site Analysis

A comprehensive site analysis has been undertaken for the site to determine the issues and opportunities development potential of the site. The following aspects have been examined as part of this process:

- Topography
- Visual impact
- Vegetation quality and community
- Ecology
- Bushfire
- Watercourses and riparian zones
- Easements
- Assessment of buildings to be retained/refurbished demolished



Figure 5 – Aerial

— Site Boundary

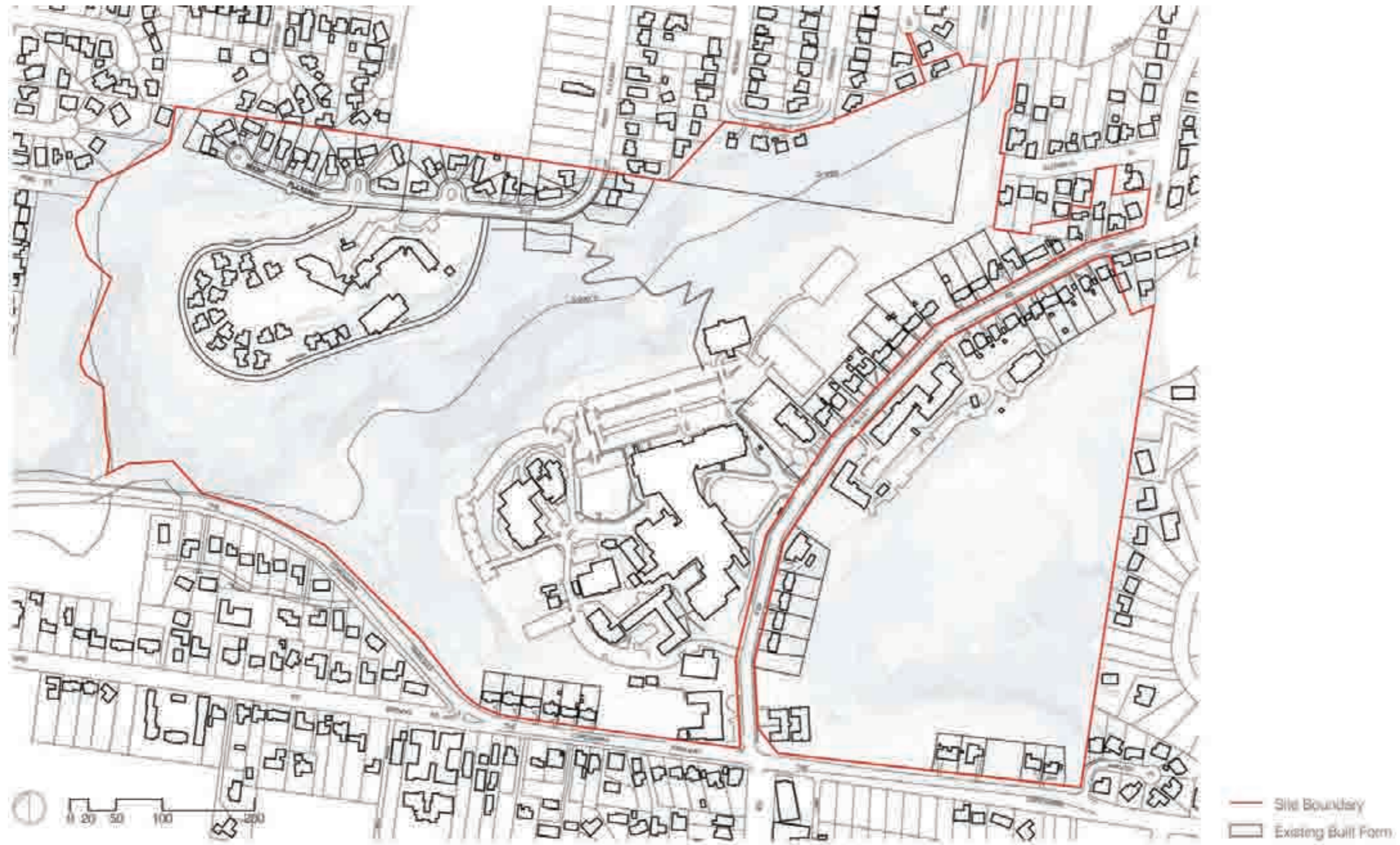


Figure 6 – Existing Built Form



Figure 7 – EEC



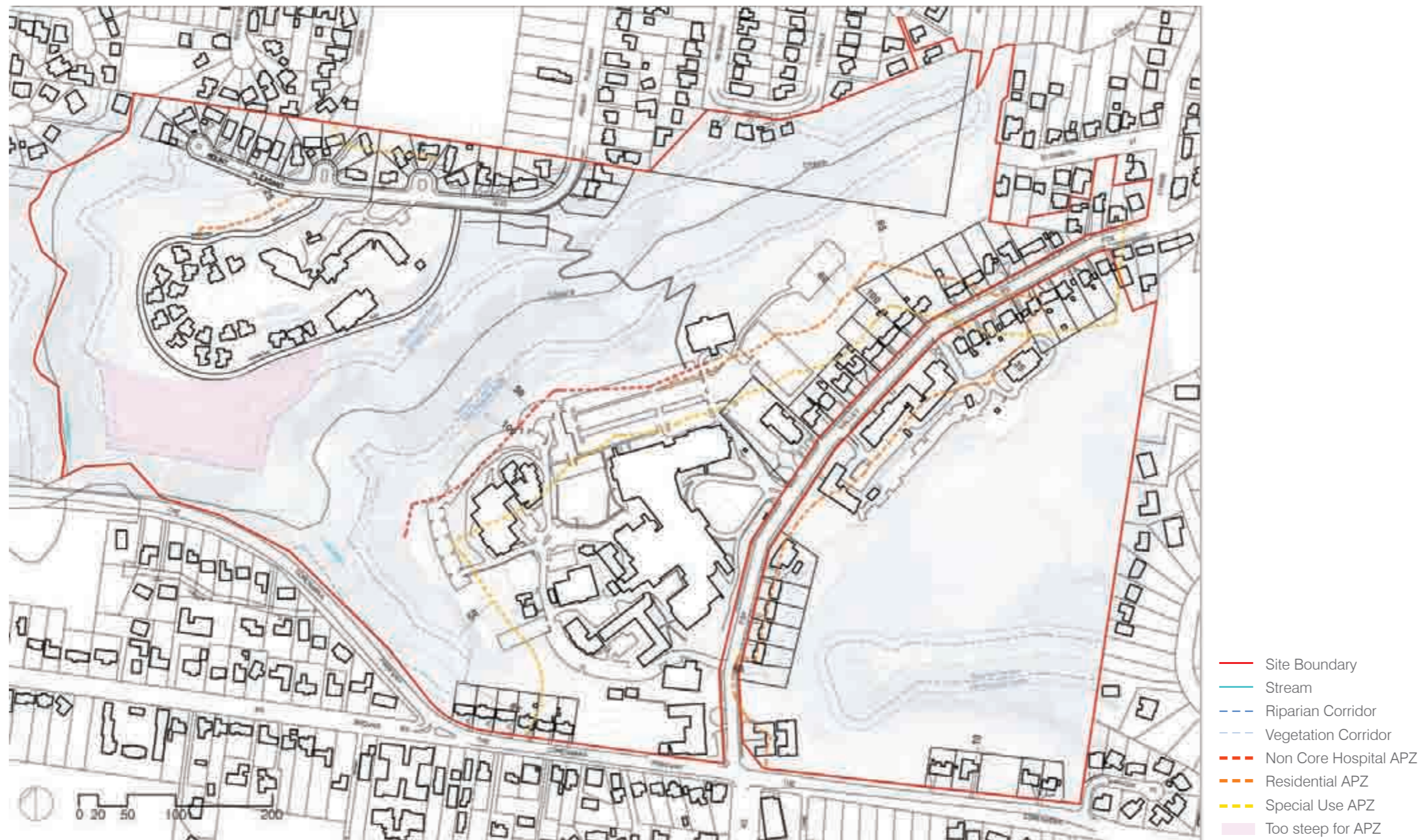


Figure 8 – Residential and Special Use APZ

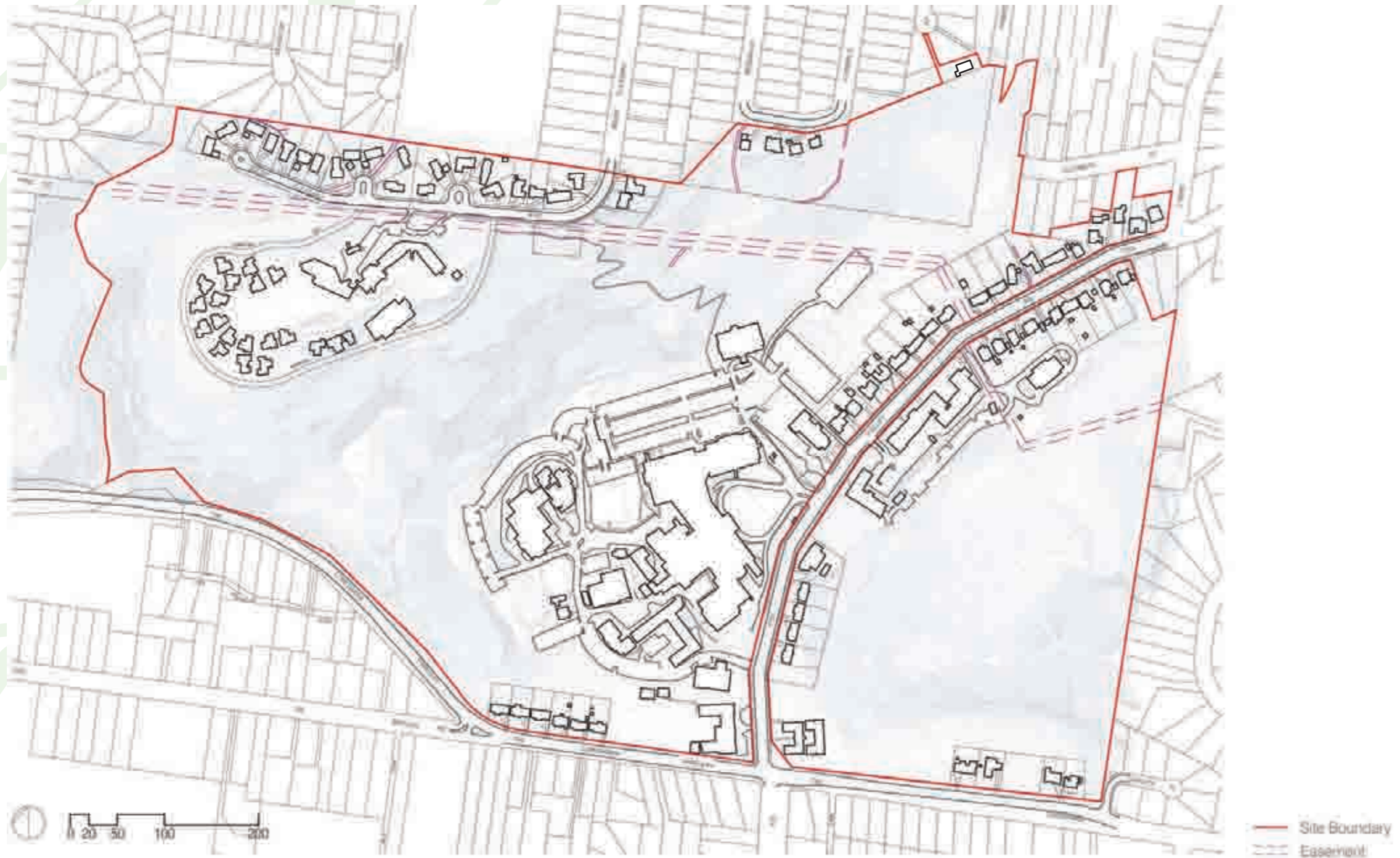


Figure 9 – Easements

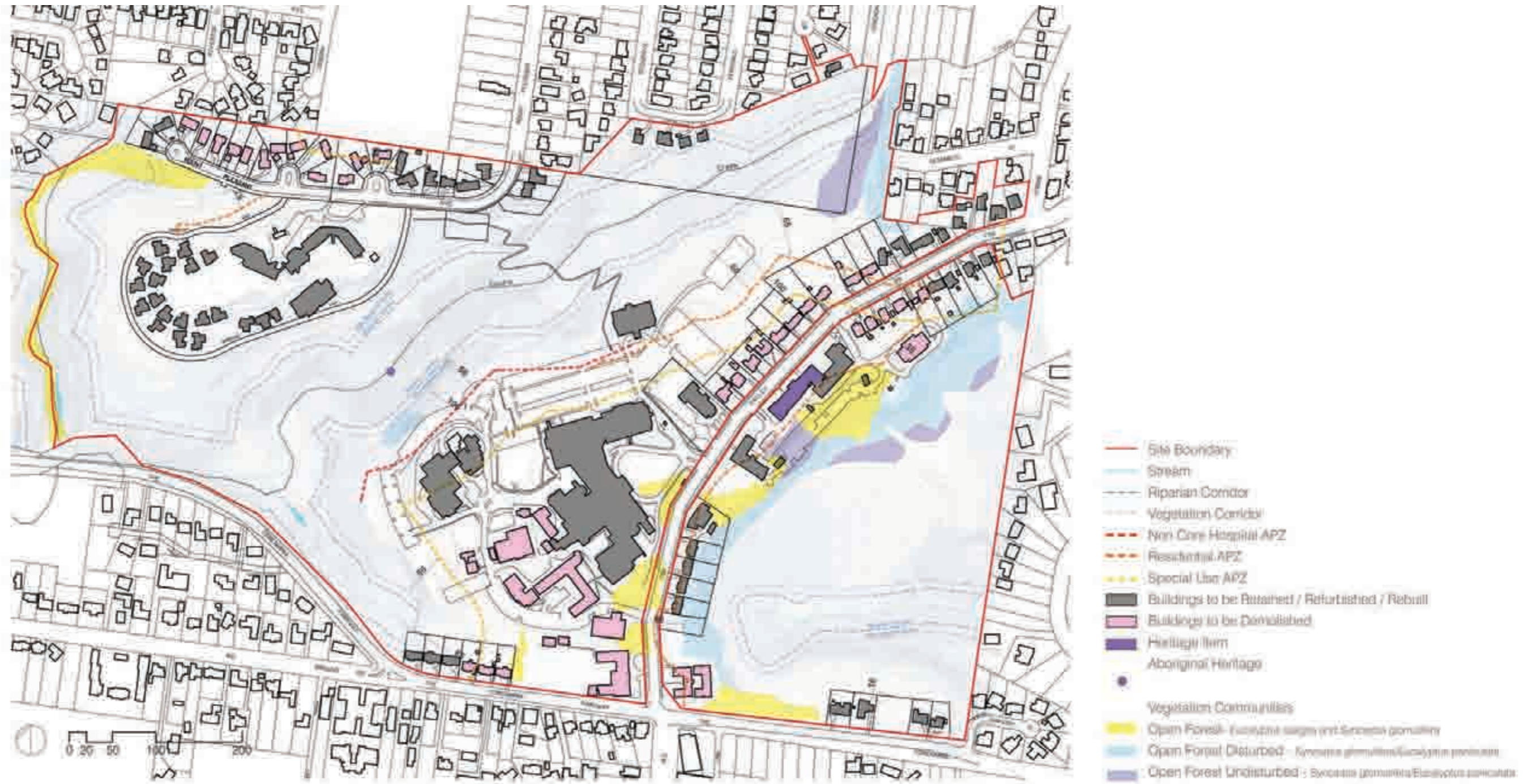


Figure 10 – Site Analysis

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### 3 STRATEGIC CONTEXT

Released in December 2005, the Metropolitan Strategy outlines how growth and development in the Sydney Metropolitan area will be catered for over the next 25 years (2031). The Metro Strategy is based on an expected population increase of 1.1 million people and an additional 640,000 dwellings, 500,000 jobs, 7,500 hectares of industrial land, 6.8 million square metres of commercial floor space and 3.7 million square metres of retail space will be required to accommodate the increase.

The Metropolitan Strategy has been divided into ten subregions and subregional strategies have been prepared for these ten subregions. Hornsby is located in the North Subregion which it shares with Ku-ring-gai Council. The draft North Subregional Strategy has been prepared by the Department of Planning and was on exhibition for community comment until 8 February 2008. It includes two key targets to be achieved by 2031; namely 13,500 additional jobs (9,000 in Hornsby and 4,500 in Ku-ring-gai) and 21,000 dwellings (11,000 in Hornsby and 10,000 in Ku-ring-gai).

The Draft North Subregional Strategy lists the Sydney Adventist Hospital as a “*Knowledge Asset and Key Industry*” and is also recognised as an existing cluster of business activity associated with knowledge infrastructure identified above and the skill base of its resident workforce, which can be leveraged for ongoing success.

The fact that the Estate has been overlooked in the Sub-Regional Strategy as a specialised centre is perhaps symptomatic of potential conflicting interests, as illustrated in the context of previous residential and seniors living development proposals which have previously been addressed at local government level.

The proponent contends that the Hospital's status as a specialised employment centre should be acknowledged in the context of the North Sub-Regional Strategy. As a result it is proposed that the urban design objectives prepared for other town centres such as height, density and built form should be applied to the site. It is noted that the Estate will not have any significant retail development that might compete with other existing town centres and the overall retail hierarchy.

The consistency of the Wahroonga Estate with the aims, objective and action items of the Draft North Sub-Regional Strategy is discussed in **Section 9.2** of this report.

## 4 STATUTORY REQUIREMENTS

### 4.1 Environmental Planning and Assessment Act 1979

Part 3A of the EP&A Act 1979 provides an assessment and approval regime specifically tailored for major infrastructure and other projects of state significance, for which the Minister for Planning is the approval authority. The provisions of Part 3A apply to major projects where the Minister has made a declaration relating to the specific development or a class of developments to which that project belongs.

Part 3A of the Act came into force on 1 August 2005. It established new assessment procedures for various forms of 'major development' of state or regional significance. Such significance can be established in a number of ways, including various types of listing under State Environmental Planning Policy (Major Projects). Part 3A establishes a separate legal regime for the assessment of Major Projects, for which The Minister is the approval authority, and which includes the provision of 'Concept Plan' approval, whereby the broad planning parameters of a project can be approved prior to separate application for the detailed aspects of a project.

#### 4.1.1 State Environmental Planning Policies

##### *State Environmental Planning Policy (Major Projects)*

State Environmental Planning Policy (Major Project) came into affect on 25 May 2005 and was subsequently amended on 31 October 2005. This SEPP defines 'Major Projects' for which the Minister of Planning is the approval authority, including categories of development listed at Schedule 1, which includes Group 7 - Health and Public Service Facilities – Hospitals. The hospital components of the project clearly conform to the Group 7 class of development.

In the past, when the Minister sought to develop a new planning regime on a major site, a site specific regional environmental plan or SEPP had to be made. Under the provisions of the Major Projects SEPP, the Minister can amend the SEPP to add the site to Schedule 3.

To be listed in Schedule 3, a project must be of State or regional planning significance because of its social, economic or environmental characteristics. When considering whether a site can be categorised as being of State significance, the Minister must consider whether the site meets one or more of the following criteria:

- (a) *be of regional or state importance because it is in an identified strategic location (in a State or regional strategy), its importance to a particular industry sector, or its employment, infrastructure, service delivery or redevelopment significance in achieving government policy objectives; or*
- (b) *be of regional or state environmental conservation or natural resource importance in achieving State or regional objectives. For example protecting sensitive wetlands or coastal areas; or*
- (c) *be of regional or state importance in terms of amenity, cultural, heritage, or historical significance in achieving State or regional objectives. For example sensitive redevelopment of heritage precincts; or*

(d) *need alternative planning or consent arrangements where:*

(i) *added transparency is required because of potential conflicting interests*

(ii) *more than one local council is likely to be affected.*

The planning provisions contained in a Schedule 3 listing may relate to:

- zoning and permitted land uses possibly accompanied by a map with layout of subsequent land uses on the site
- performance criteria applying to different types of development
- list of exempt or complying development with any relevant performance criteria
- list of any State significant development to be determined by the Minister and/or local development to be determined by council.

The then Minister declared the project a 'Major Project' (**refer Appendix B**) and advised in writing that he is prepared to consider a specific listing of the project under Schedule 3, subject to consideration of a range of specific criteria (**refer Appendix D**). A formal application for Schedule 3 listing was made and has since been approved by the minister gazetted in Dec 2009.

##### *Additional State Environmental Planning Policies*

The following State Environmental Planning Policies (SEPPs) also apply to the project.

- SEPP (Infrastructure) 2007
- SEPP (Seniors Living) 2004
- SEPP (Building Sustainability Index) 2004
- SEPP 10 - Retention of Low-Cost Rental Accommodation
- SEPP 11 – Traffic Generating Development
- SEPP 19 – Bushland in Urban Areas
- SEPP 44 – Koala Habitat Protection.
- SEPP 53 – Metropolitan Residential Development
- SEPP 55 – Remediation of Land
- SEPP 65 – Design Quality of Residential Flat Buildings

A description and an assessment of the proposed development in relation to each of these Environmental Planning Policies are included in **Table 10**.

#### 4.1.2 Regional Environmental Planning Policies

##### *Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005*

This REP is aimed at ensuring better and consistent development decisions and includes such issues as ecological and scenic quality, built form and design, maintenance of views, public access and recreation and working harbour uses. The REP includes provisions relating to heritage conservation and wetlands protection and provides planning controls for strategic foreshore sites.

The Concept Plan for the Wahroonga Estate has been developed with regard to the aims and objectives of this REP. The site is a Catchment for the Lane Cove River which is in turn a catchment for Sydney Harbour, and the proposed development has been designed so as to protect, enhance and maintain the natural assets of the site.

#### 4.1.3 Local Statutory Planning Policies

The following Environmental Planning Instruments, Development Control Plans (DCPs) and policy documents are applicable to the subject site.

- Hornsby Shire Local Environmental Plan (LEP) 1994
- Ku-ring-gai Planning Scheme Ordinance

##### *Hornsby Shire Local Environmental Plan (LEP) 1994*

A small part of the site is within Hornsby Shire LGA. This area is zoned Residential A (low density) and relates to four (4) dwellings on Ferndale Avenue and one (1) dwelling on Nicholas Crescent, and the surrounding open space, at the far north of the site. No development is proposed on this parcel of land.

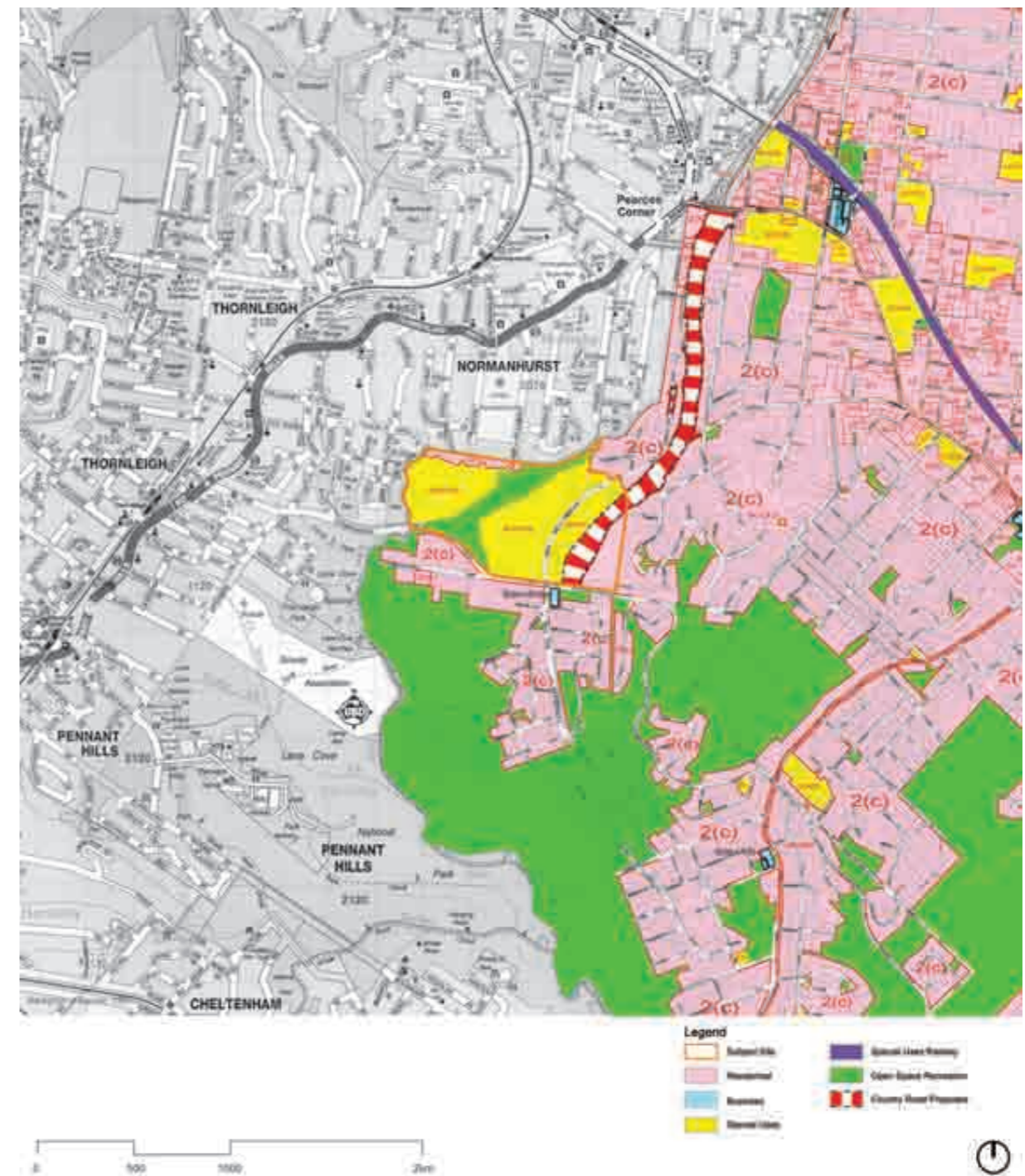


Figure 11 – Existing Site Zoning

The majority of the Wahroonga Estate is located within the Ku-ring-gai LGA. The relevant zonings include:

#### *East of Fox Valley Road*

- Near the eastern boundary of the property is zoned Residential 2(c). Several dwelling houses have been developed along the Comenarra Parkway; however, the majority of the 2(c) land remains undeveloped bushland.
- Adjacent to Fox Valley Road the land is zoned Special Uses 5(a) (church)
- Between the 5(a) zone and the 2(c) zone is a corridor which is zoned for a proposed County Road for a future F3 / M2 link Road. However, it is understood that this corridor has been abandoned.

#### *West of Fox Valley Road.*

- Adjacent to Fox Valley Road and Mount Pleasant Avenue the site is zoned Special Uses 5(a) – Hospital. The land under this zone is divided into two sections by the Coups creek corridor zoned part Recreation Private 6(b).
- There are parts of the site zoned Residential 2(c) adjacent to Mount Pleasant Avenue to the north and east of the site.
- Council owns a small public reserve with a frontage to Mt Pleasant Ave zoned Public recreation 6(a). This site is surrounded on three sides by the Recreation Private 6(b) zone on the Wahroonga Estate lands. This land is excluded from the application as no authority has been issued by Council for its inclusion and no works are proposed on this land.

#### *Development Standards*

The KPSO contains standards for any developments in relation to access and parking considerations and to the consideration of aesthetic appearance for various open space zones. Waterways and main roads (Clause 33).

There are no specific standards in the KPSO or development control plans specific to hospitals or medical facilities.

Land uses which apply to a 2(c) site under KPSO are mainly dwelling houses and home occupations (cl 23). Key stands include:

- Minimum allotment sizes for subdivision and dwelling houses (cl. 56 and 43)
- Minimum height of dwelling houses and home occupancies (cl. 46)
- Maximum built upon area for dwelling house sites (cl. 60C)

#### 4.1.4 Development Control Plans

- Ku-ring-gai DCP 14 – Development in Business Zones
- Ku-ring-gai DCP 31– Access
- Ku-ring-gai DCP 38 – Residential Design Manual
- Ku-ring-gai DCP 40 – Construction and Demolition Waste Management
- Ku-ring-gai DCP 43 – Car Parking
- Ku-ring-gai DCP 46 – Exempt and Complying Development
- Ku-ring-gai DCP 47– Water Management
- Ku-ring-gai DCP 48 – Medium Density Residential Development
- Ku-ring-gai DCP 55 – Railway / Pacific Highway Corridor and St Ives Centre
- Ku-ring-gai DCP 57 – Child Care Centres

An assessment against these controls has been made in **Section 9.1** of the report.

#### 4.1.5 Other relevant statutory matters

##### *Draft LEP Template*

On the 31st of March 2006 the NSW Government gazetted the Standard Instrument (Local Environmental Plans) Order 2006. The standard instrument sets out a template for the preparation of new LEPs in NSW using a standard set of zones, provisions and definitions. This requires all councils to prepare a new principal LEP for their local government area using the standard instrument within the next five years. Ku-ring-gai Council is required to have a standard LEP gazetted by 2011.

The Minister for Planning has indicated that the Wahroonga Estate site is a major project and will consider a request to list it as a State Significant Site under Schedule 3 of the Major Projects SEPP 2005. As such when Ku-ring-gai prepare their standard LEP the zoning will need to be consistent with any state significant listing under Schedule 3.

##### *117 Directions*

Section 117 of the EP & A Act allows the Minister for Planning to issue Section 117 Directions which can be used to guide specific issues which must be considered and incorporated by Councils in LEP development and strategic planning documents. These directions allow the Minister for Planning to manage or control certain issues that arise. Section 117 directions do not apply directly to development, but are implemented through local Councils.

The following Ministerial Directions apply to the project:

- No. 17 – Integrating Land Use and Transport
- No. 19 – Planning for Bushfire Protection
- No. 21 – Residential Zones
- No. 26 – Special Area Zones and Recreation Zones

A description and an assessment of the proposed development in relation to each of these Ministerial Directions are included in **Table 8**.



## 5 CONSULTATION

### 5.1 Community Reference Group

The Minister for Planning directed the DoP to form a Community Reference Group (CRG) to provide information and gain input to facilitate the planning assessment process for the Sydney Adventist Hospital, Wahroonga proposal. The CRG has provided and will continue to provide a forum for stakeholders to access information so they can prepare detailed and informed submissions throughout the process.

The purpose and Terms of Reference for the CRG were:

- To provide a forum that allows key stakeholders with a diverse range of view in order to make a considered response to the proposal, and
- To assist the DoP gain a better understanding of key stakeholder concerns.

The CRG is not an assessment body; however it is linked to the assessment process and is separate to consultation being undertaken by JPG. The key achievement of the CRG thus far has been to set and refine the parameters for the Director General's Requirements. The CRG is intended to sit twice during the exhibition period to enable members to seek clarification about issues of interest as a means of informing their preparation of submissions.

### 5.2 Consultation with Government Agencies

Consultation, particularly with Ku-ring-gai Council, has occurred over a number of years regarding future development at the site. The ACA has previously made development applications [DA/1920/88 - Residential Dwellings and DA/596/99 - Seniors Living and Aged Care Retirement Living] and a rezoning submission (Precinct 6 B2/B3 Freeway Corridor, 2005) for elements similar to those in the proposed concept plan. These fragmented processes addressed issues (traffic, ecology, bushfire etc) that warrant a more comprehensive whole of site approach and in at least one case, were subject to Land and Environment Court proceedings. More recently, consultation regarding the Wahroonga Estate concept plan occurred with Hornsby and Ku-ring-gai Councils during 2007, prior to lodging the Part 3A application. The particular concerns of Ku-ring-gai Council are detailed in its Issues Paper (12/6/07).

Formal government and agency responses were provided to the DoP during input to the preparation of the DGRs. These have been considered in preparing the EA and concept plan. Additional dialogue and some formal correspondence occurred in preparing specialist reports. The following table identifies some specific meetings/correspondence relevant to the preparation of the EA and concept plan, with an emphasis on consultation undertaken since the Part 3A application was lodged in September 2007.

Consultation with the relevant Government agencies has been conducted in conjunction with the preparation of expert reports undertaken to date for the Project, as outlined in the following table (**Table 3**). Government Agencies that have been involved include: The NSW Roads and Traffic Authority, The Ministry of Transport (MoT), The NSW Department of Environment and Climate Change (DECC), Sydney Busses, State Rail, NSW Health, Heritage Council, Hornsby Council, Ku-ring-gai Council, the NSW Rural Fire Service (RFS) and the Federal Department of the Environment, Water, Heritage and the Arts (DEWHA).

Table 3 – Government agency Consultation

Agencies and other authorities	Item
Ku-ring-gai Council	Council issues paper – 12/6/07 Representation on CRG – 25/2/08 & 15/5/08
Hornsby Council	Representation on CRG – 25/2/08 & 15/5/08
NSW Dept Water & Energy	Email - 26/5/08
NSW Health	Expansion of San facilities requires NSW Health involvement. Specific health related consultation will occur during preparation and submission of hospital related project applications.
NSW Ministry of Transport	Meeting – 21/5/08
NSW Roads and Traffic Authority	Meeting – 5/2/09
NSW Department of Education and Training	No response received to DoP referral or JPG follow up on 16/10/08.
NSW Dept Environment & Climate Change	Meeting – 21/1/09
NSW Rural Fire Service	Meetings - 4/7/08, 16/7/08 & 23/9/08 Site inspection – 16/7/08
Commonwealth Dept of Environment, Water, Heritage & Arts	EPBCA referral – 17/9/08 EPBCA referral notification – 5/11/08

### 5.3 Community Consultation

As outlined in the following table (**Table 4**) Johnson Property Group (JPG), the Australasian Conference Association (ACA) and the Sydney Adventist Hospital (San) conducted staff information and consultation sessions to assist preparation of the concept plan for the redevelopment of the Wahroonga Estate. This ensured that the Estate community and end users were informed of the proposal, and equally important, were able to provide the knowledge and opportunity for constructive feedback.

Table 4 – Community Consultation

Public	
Community Reference Group	Meetings - 25/2/08 & 15/5/08
Existing Users of the Site	Hospital information sessions – 26/2/08, 4/3/08 & 6/3/08 ACA staff information session – 6/3/08 Wahroonga School Meeting - 7/8/08
Surrounding Residents	Direct engagement of residents is scheduled during the public exhibition period. Notwithstanding this, local residents are represented on the CRG; some have attended information sessions; and others have provided feedback directly to the hospital, church and JPG in response to information disseminated through the community and the PAR available on the DoP website.

Feedback received through the consultation program was reviewed by the project design team and informed the concept proposal to balance site capability, user expectations, and operational requirements of the site. This program complemented the Department of Planning's Community Reference Group (CRG) and the statutory exhibition process.

A further detailed consultation program will be completed during the exhibition period and preparation of the preferred project report consisting of a combination of the following.

A full report on the consultation undertaken to date is included at **Appendix G**.

The schedule of information/consultation sessions is provided in the following **Table 5**:

Table 5 – Community Consultation Sessions

Date/Time	Item	Remarks
April 2008	PAR on DoP website	
Mon 25 Feb 08	CRG 1st meeting	
26 Feb 08	Hospital staff information session	
4 Mar 08	Hospital staff information session	
6 Mar 08	Hospital staff information session	
15 May 08	CRG 2nd meeting	
Ongoing	Consultation with government / service providers	Statutory and non-statutory consultation during preparation of the concept plan / environmental assessment and planning agreements.
During Exhibition	Letterbox drop	Project summary, web addresses and JPG / DoP contact details.
During Exhibition	Public information day	Hold during statutory exhibition period Promote through local media and SDA networks
During Exhibition	Media coverage	During statutory exhibition period
During Exhibition	CRG meetings	

## 5.4 Consultation Undertaken During Exhibition

Appendix G of the exhibited Concept Plan outlined a consultation program to be conducted during the Public Exhibition period. By way of background, the following is extracted from Appendix G:

### *Appendix G: Information Propagation*

A program for further information dissemination during the exhibition period is provided below. It complements the Community Reference Group (CRG) and statutory exhibition processes to ensure the community and end users are informed of the proposal. Importantly, it also provides the knowledge and opportunity for constructive feedback from these groups. The consultation and information program consists of a combination of the following:

#### *Web Information*

Information relating to the redevelopment proposal will be publically available through the DoP website (<http://www.planning.nsw.gov.au/>) during the public exhibition. JPG and the Sydney Adventist Hospital web sites will also be updated to provide advice and/or more detailed information relating to the proposed redevelopment and the status of the assessment process.

**Response:** A specific website was established for this project – [www.wahroongaestate.com.au](http://www.wahroongaestate.com.au).

General information about the project was available on this webpage, as was a copy of the Wahroonga Estate newsletter. Exhibited documents were available for download on this site.

This website was advertised in media articles by the Hornsby Advocate as well as within the Wahroonga Estate newsletter.

#### *Neighbourhood letterbox drop and/or door knocking*

This will occur within the adjoining community during the early stages of the exhibition period. The aim off the letterbox drop or door knock is to update the community with details of the assessment process and advise of the timings and arrangements of information sessions and the public open day. It will promote the opportunity for local residents to directly engage in the project assessment process and provide feedback on the redevelopment proposal.

**Response:** A newsletter was distributed to approximately 5,800 households / businesses within the area generally shown on the following image. The newsletter was distributed by a third party company (Distribution and Display) on 13 and 14 May 2009.

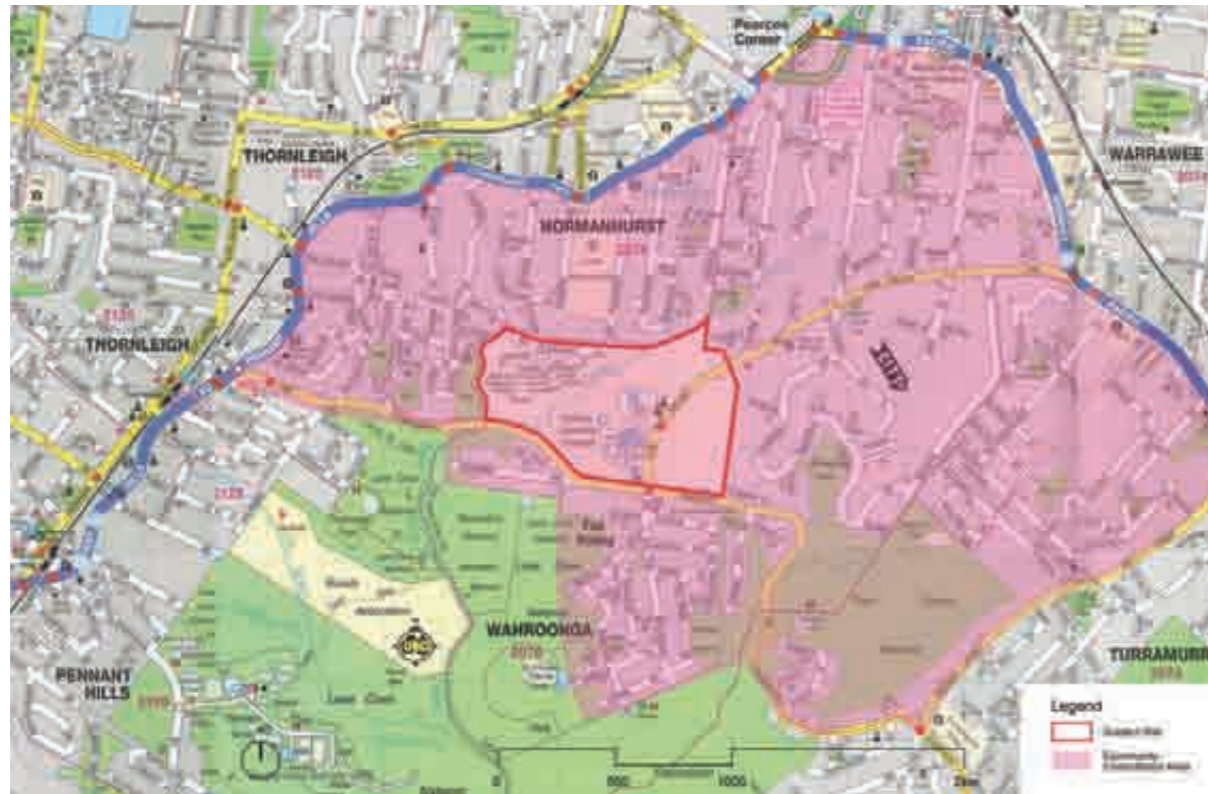


Figure 12 – Community Consultation Area (Source: JPG)

Following distribution of this newsletter, JPG were invited to meet with 4 local residents (at the residents request) to explain the proposal to them. This occurred on 20 May 2009 and 9 June 2009. Comments at each meeting generally related to understanding of the proposal, scale of development and associated traffic impacts.

In addition, approximately 12 phone calls were received from local residents during the exhibition period. Again, questions raised were primarily in relation to traffic impacts.

#### *Information Sessions (staff and general public)*

Further information sessions will be provided for the attendance of staff and the general public. These will provide an overview of the redevelopment proposal, field questions from the audience and identify opportunities for interested parties to further participate in the public exhibition process.

**Response:** The following information sessions were conducted for onsite users and interest groups:

- 11 May 2009 Hospital Staff (1.30-2.30pm)
- 13 May 2009 SDA Administration workers (1-1.45pm)
- 13 May 2009 Adventist Media Network workers (4.30-5.15pm)
- 13 May 2009 School parents, church employees, retirement village members & hospital staff (7-8pm)

It was estimated that about 30 hospital workers attended the 11 May 2009 presentation and approximately 150 attendees (in total) at the 13 May 2009 presentations.

#### *Public Information Day*

To be held on site at the Wahroonga Estate during the public exhibition period, the public information day will provide an opportunity for staff and the general public to view the redevelopment documentation. Key project consultants involved in preparing the environmental assessment will be available for the community to engage directly to discuss general and technical issues relating to the redevelopment proposal.

**Response:** A public information day was held on the front lawn of the Sydney Adventist Hospital on Sunday 17 May 2009 from 10am to 3pm. Details of the information day were provided within local media and in the distributed newsletter.

It was estimated that over 300 residents attended the open day to discuss the proposal with representatives of the San, JPG or consultants. Key project consultants in attendance were: David Robertson (Cumberland Ecology); Graham Swain (Australian Bushfire Protection Planners); Robert Wilson (Hill PDA); Jennie Lindbergh (Australian Museum Business Services); Paul Williams (URBIS); Greg Ives (Hyder Consulting); Bruce Masson (Halcrow Masson Wilson & Twiney).

Most discussion on the day revolved around traffic and parking impacts.



Figure 13 – Public Information Day (Source: JPG)

#### *ACA internal workshops and committees*

Project workshops and committees will continue to occur in accordance with ACA procedures. These provide an opportunity for direct input from the Estate users, in addition to the opportunity for separate submission through the public exhibition.

**Response:** Representatives from internal user group committees attended the internal presentations conducted on 13 May 2009. The presentation gave attendees an overview of the proposal to inform them if they chose to make a submission during the exhibition period.

### Media Coverage

Local and regional media will be engaged to:

- advise of the public exhibition;
- notify the timings and venues of the information sessions and open day; and
- promote information relating to the redevelopment proposal.

**Response:** In addition to the formal advertisements placed in local, regional and national media by Department of Planning, the following is a summary of all of the media coverage that we are aware of that occurred during the exhibition period:

Thursday 7 May 2009	Medical Marvel: Hospital defies sick cash climate by planning \$780 million facelift (Hornsby Advocate)
Wednesday 13 May 2009	Powerless Mayor Rues Plan (Hornsby Advocate)
Thursday 14 May 2009	Debate is healthy – fury isn't (Hornsby Advocate)
Wednesday 20 May 2009	Wahroonga Estate exhibition (Alan Jones 2GB brief discussion with Minister Keneally)
Thursday 21 May 2009	End of Road for Quiet Life (Hornsby Advocate)
Wednesday 27 May 2009	San Development Complaints Line Extended (Hornsby Advocate)
Thursday 28 May 2009	Wahroonga Estate exhibition extended (Alan Jones 2GB)
June 2009	San Project “grossly unacceptable” (Sydney Observer)
Thursday 11 June 2009	Opposition serious (Hornsby Advocate)
Thursday 18 June 2009	San Submissions to End (Hornsby Advocate)
Thursday 2 July 2009	Unhealthy Response (Hornsby Advocate)

We are advised that over 50,000 prints of the Hornsby Advocate is produced for circulation in the Sydney region each Thursday.

### Community Reference Group Presentations

Presentations to members of the Department of Planning appointed Community Reference Group were conducted on 14 May 2009 and 21 May 2009. The Community Reference Group is independently facilitated and is made up of representatives from Ku-ring-gai Council (Councillors and staff), local residents, STEP Community Environment representative, San and SDA.

Other attendees at each meeting were from Department of Planning, Johnson Property Group, and project consultants.

The following presentations were made on each night:

14 May 2009	Traffic / Transport / Parking, Urban Design & Built Form, Heritage, Social & Economic, Developer Contributions
21 May 2009	Biodiversity, Bushfire, Ecologically Sustainable Development, Geotechnical & Contamination, Drainage, Utilities and Infrastructure

Questions and Answers followed the presentations.

A final CRG meeting was convened by Department of Planning following submission of the Preferred Project Report on 24 Sept 2009.

### Sydney Adventist Hospital – Internal Consultation

Sydney Adventist Hospital conducted the following consultation for internal employees:

1. Internal weekly CEO reports were distributed (with payslips) to approximately 2,200 staff on 13 May 2009, 27 May 2009 and 10 June 2009 providing information about the proposal.
2. Images and Information links to the exhibited material were displayed on the San hospital intranet for a 7 week period.
3. Rotary Club of Wahroonga was addressed by the San Hospital CEO on 13 May 2009 with approximately 60 attendees.
4. An information table was manned either in the Hospital foyer or San Café entrances for a 4 day period (2-3hrs per day) during the last week of the exhibition period.
5. The San Hospital also emailed 600 of their accredited medical officers (ie specialist Doctors) with details of the proposal.

### Seventh-Day Adventist Community Consultation

In late May 2009, notices of the proposal were published in the SDA's weekly "RECORD" publication which is circulated to approximately 50,000 SDA church members across Australia and the South Pacific Region.

TV news bulletin stories were broadcast on the SDA webpage and on the SDA churches' international Hope Channel on 22 and 29 May 2009.

Email notices were distributed to all employees working on the Wahroonga Estate site inviting them to attend the internal consultation sessions conducted on 13 May 2009 (as previously mentioned).

A presentation was given to approximately 50 residents of the Wahroonga Retirement Village and neighbours of Osborn Road and Mount Pleasant Avenue on 18 August 2009.

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### *Community Group Consultation*

The following local Rotary clubs have been addressed by either representatives of the San Hospital or senior administration staff of the SDA regarding the proposal:

- Wahroonga;
- Hornsby;
- Thornleigh;
- Ku-ring-gai
- Pennant Hills
- Waitara

### *Government Consultation*

Recent Government Department consultation includes:

Friday 10 April 2009	Rural Fire Service
Thursday 30 April 2009	Meeting with Roads and Traffic Authority staff
Tuesday 5 May 2009	Meeting with Department of Environment and Climate Change staff
Thursday 21 May 2009	Meeting with RTA's Sydney Regional Development Advisory Committee
Wednesday 10 June 2009	Onsite meeting with Department of Environment and Climate Change, Ku-ring-gai Council and Department of Planning staff
Tuesday 16 June 2009	Meeting with Roads and Traffic Authority staff
Wednesday 17 June 2009	Meeting with Department of Planning and Ku-ring-gai Council staff
Tuesday 30 June 2009	Rural Fire Service
Tuesday 14 July 2009	Rural Fire Service on site
Tuesday 14 July 2009	Council Traffic Engineer on site

### *Hornsby Advocate*

The Hornsby Advocate ran an online poll, with the following results (accessed 25 June 2009):

Have you, or will you, be making a comment or complaint about the Adventist Church-San Hospital \$780 million joint venture, the Wahroonga Estate?

Yes 39% (13 votes)

No 61% (20 votes)

Should major developments be stopped if their only apparent down sides are potential traffic problems?

Yes 63% (17 votes)

No 37% (10 votes)

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## 6 DIRECTOR GENERAL'S REQUIREMENTS

An extract of the DGRs and reference to the location each requirement is addressed is included below.

Table 6 – Director General Requirements

General Requirements	Location in Report
<b>The Environment Assessment must include:</b>	
Executive summary	i.
Description of the proposal comprising:	1.3
– Project vision, objectives and need;	2.2
– Description of site, including cadastral and title details;	7.0
– Various precincts and staging (including infrastructure staging); and	8.8
– Alternatives considered;	
Consideration of:	4.0
– All relevant State Environmental Planning Policies;	9.1
– Ku-ring-gai Planning Scheme Ordinance and any relevant DCPs;	
– Metropolitan Strategy “City of Cities” and draft North Subregional Strategy;	
Draft Statement of Commitments outlining:	10.0
Commitments to public benefits including State and local infrastructure provisions or contributions, environmental management, mitigation and monitoring measures and clear indication of responsibilities;	
Signed Statement of the author of the EA confirming that the information is neither false nor misleading;	i
Report from a quantity surveyor identifying the capital investment value of the Concept Plan;	1.4
	Appendix E
<b>Key Assessment Requirements</b>	
Site Analysis	2.3
– Site Opportunities and Constraints, identifying natural and built environmental features within and adjoining the site;	2.4
Land Use	2.3
– Identify proposed precincts, stages, timing, uses contained in each precinct, road and pedestrian networks;	4.1.4
– Existing and proposed zones;	8.2
– Table outlining different land uses, FSR, development yield, site coverage for each use and total GFA for the development;	8.3
– Consider surrounding land use, patterns, density and character and assess/resolve potential land use conflicts;	8.7
– Justify proposed commercial centre development with particular regard to impacts on existing local town centres;	8.8
	8.9
	8.10
	9.5
	Appendix A

Ownership and Title	8.9
– Identify proposed staging, ownership and titling arrangements for each of the proposed land uses;	Appendix F
– Identify measures to ensure residential accommodation for hospital and church staff will be retained for that purpose;	Appendix K
Urban Design – Built Form	8.4
– Typical plans (elevations and sections) and associated development controls identifying the height, bulk, scale, density and typologies of the proposed form in relation to existing development site, surrounding development and landscape;	8.7
– Typical plans and sections of the proposed public domain, identifying the proposed street network and car parking, pedestrian and bicycle linkages and landscape treatments;	9.3
– Assessment of any potential impacts using photomontages and view analysis;	
Heritage	9.4
– Heritage Impact Statement assessing impacts on the Adventist Administration Building (local Heritage Item under KPSO), Mahratta Urban Conservation Area, views from different sites along the ridge tops on either side of the Lane Cove River (e.g. Cheltenham and West Pymble) and timber framed houses north of Fox Valley Road for any significance;	Appendix H
– Assess the development against the Department of Environment and Climate Change’s draft Guidelines for Aboriginal Cultural Heritage Impact Assessment and Community Consultation;	
Traffic, Transport and Car Parking	8.8
– Traffic Study in accordance with the Roads and Traffic Authority’s Guide Traffic Generation Developments, with particular regard to:	9.6
▪ Existing Road Capacity, expected impacts on local and regional roads and any upgrade requirements;	Appendix J
▪ Internal road layout and access arrangements	
▪ Pedestrian and bicycle linkages; and	
▪ Access for emergency vehicles.	
– Transport Management and Accessibility Plan (TMAP) for the entire site, in accordance with the Ministry of Transport’s Interim TMAP guidelines, also including:	
▪ Staging/ Sequencing Plan;	
▪ Construction and Management Plan; and	
▪ Voluntary Planning Agreement addressing MoT’s requirements.	
– Car parking plans showing location and number of existing and proposed car parks, allocation to proposed uses and evidence confirming adequacy.	
Bushfire	9.8
– Demonstrate compliance with NSW rural Fire Service’s Planning for Bush Fire Protection 2006, with particular regard to ensuring Special fire Protection purpose developments are located away from the bushland interface;	Appendix L
– Identify vegetation types, ownership and ongoing management of any proposed Asset Protection Zones;	

Biodiversity	9.7 Appendix M
<ul style="list-style-type: none"> <li>Identify the location, extent and species of vegetation proposed to be cleared;</li> <li>Assess the impacts of proposed vegetation clearing and development generally on critically endangered and endangered communities, identified threatened species, having regard to the Department of Environment and Climate Change's Threatened Species Assessment Guidelines;</li> <li>Biodiversity conservation strategy including offset and/or rehabilitation measures to avoid or mitigate impacts;</li> <li>Assess and mitigate impacts in edge effects, ecological corridors, watercourses and associated riparian vegetation, existing rock outcrops and Lane Cover National Park;</li> <li>Identify the location, extent, timing of dedication, intended ownership and long term management of conservation lands;</li> <li>Comprehensively address potential impacts on, and proposed mitigation measures for listed threatened species under the Environmental Protection and Biodiversity Conservation Act (EPBC Act); (including Blue Gum High Forest and Turpentine Ironbark forest, Grey Headed Flying fox and Swift Parrot).</li> </ul>	
Ecologically Sustainable Development	9.9 Appendix N
<ul style="list-style-type: none"> <li>Demonstrate how the development will satisfy ESD principles, including BASIX, waster sensitive urban design measures and, energy efficiency and recycling and waste disposal;</li> </ul>	
Geotechnical and Contamination	9.10 Appendix O
<ul style="list-style-type: none"> <li>Geotechnical report assessing matters such as the suitability of the site for its proposed uses, slope stability, erosion hazard, proposed earthworks and retention methods;</li> <li>Access suitability of the site for proposed uses in accordance with SEPP 55;</li> </ul>	
Utilities and Social Infrastructure	9.11 9.12 Appendix I Appendix Q Appendix R
<ul style="list-style-type: none"> <li>Utility and Infrastructure servicing strategy, demonstrating the development can be adequately serviced for water supply, wastewater, stormwater, electricity, gas, communications and fire fighting;</li> <li>Demonstrate appropriate provision of social infrastructure and services to support expected population increase;</li> <li>Assess appropriateness of footprint size for the proposed school;</li> </ul>	
Drainage, Stormwater and Groundwater Management	9.12 Appendix R
<ul style="list-style-type: none"> <li>Identify drainage, stormwater and groundwater management issues, including riparian areas, topography, onsite water detention, water sensitive urban design measures and drainage infrastructure;</li> <li>Identify and assess any potential flooding risk;</li> <li>Identify the location of water control measures (eg basins) relative to existing bushland;</li> </ul>	
Developer Contributions	9.13 10.0
<ul style="list-style-type: none"> <li>Scope and justification of developer contributions between the proponent and the State (via relevant agencies including the Roads and Traffic Authority, Department of Education and Ministry of Transport), based on Services generated by the development and Department of Planning Guidelines;</li> <li>Scope and Justification of developer contributions between the proponent and Ku-ring-gai Council, based on existing Section 94 Plans and Department of Housing Guidelines;</li> </ul>	

Consultation Requirements	5.2 Appendix G
<p>An appropriate and justified level of consultation should be undertaken with the following relevant parties during the preparation of the environmental assessment, having regard to any previous consultation.</p> <ul style="list-style-type: none"> <li>Agencies and other authorities;</li> <li>Ku-ring-gai Council;</li> <li>Hornsby Council;</li> <li>NSW Department of Water and Energy;</li> <li>NSW Health;</li> <li>NSW Ministry of Transport;</li> <li>NSW Roads and Traffic Authority;</li> <li>Department of Education and Training;</li> <li>Department of Conservation and Climate Change;</li> <li>Rural Fire Service;</li> <li>Commonwealth Department of Environment and Water Resources; and</li> <li>All relevant utility providers;</li> </ul>	
<p>Agencies and other authorities</p> <ul style="list-style-type: none"> <li>Community Reference Group;</li> <li>Existing users of the site;</li> <li>Surrounding residents;</li> <li>Document all community consultation undertaken to date or discuss the proposed strategy for undertaking community consultation. This should include and contingencies for addressing any issues arising from the community consultation and an effective communications strategy;</li> <li>The consultation process and the issues raised should be described in the Environmental Assessment.</li> </ul>	5.1 5.3 Appendix G



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## 7 DESIGN OPTIONS / ALTERNATIVES

### 7.1 The Design Brief

The design brief is to upgrade and expand the health facilities and services while increasing the total number of dwellings with a range of residential densities. Additionally, retirement living opportunities including independent living, a hostel and nursing home to allow aging in place are also accommodated on the site. The proposed development is to incorporate expanded retail, commercial and active and passive recreation opportunities.

The design of the Comenarra Park Living Working Community incorporates best practice urban design with the following components:

- Upgrade and expand existing hospital facilities over the short to medium term by an additional 28,000sqm to take the total to 94,000sqm.
- A centralised church precinct catering for 3,200sqm floor space.
- Allowances for a K-12 school of 9,000sqm for approximately 800 students.
- A mixed used centre, to accommodate for increased demand due to expansion of the hospital and residential on site, to create employment and to reinforce the Fox Valley neighbourhood centre.
- Commercial space of 10,000sqm to maintain existing functions and allow for limited expansion of existing and/or additional functions.
- An increase of residential dwellings including a 50% increase in aged care capacity and retention of existing retirement units.
- Faculty of Nursing dedicated facilities of approximately 3500sqm to alleviate demand on hospital space and provide facility to accommodate increase in government funded spaces.
- Improved public access and management of open space.

### 7.2 The Design Process / Options

The following design process was undertaken in preparing and refining the concept plan:

The site analysis and concept plan parameters of the Preliminary Environmental Assessment (PEA) was tested and updated through more detailed environmental assessment. This was based on reports and mapping prepared by relevant specialist consultants. The testing exercise assisted in determining a final, unconstrained development footprint.

Four initial options were prepared and further refined based on specialist input and liaison with the ACA. Option 1 generally follows the PEA concept plan precincts and layout. Option 2 explores the opportunity of an alternative road layout that moved traffic to the edge of the central area. Option 3 is a further refinement of Option 1. Option 4 is a further refinement of Option 2.

Review of the PEA and each of the options was undertaken, concentrating on specific precincts and locations rather than the high level approach used in the PEA. This examined height and bulk of envelopes, identification and retention of high quality vegetation, provision of appropriate bushfire protection, access provisions, etc. and resulted in concept plan Option 5.

The options explore a mix of uses and layouts shown through indicative building envelope locations and represent a design evolution addressing how the built form concepts have been amended to respond to the site opportunities and constraints. Each option was built on the work done and assumptions used on the previous options.



Figure 14 – Design Option 1



Figure 15 – Design Option 2



Figure 16 – Design Option 3



Figure 17 – Design Option 4



Figure 18 – Design Option 5

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The main elements and variations of each option is as follows:

#### **Option 1**

- Generally follows the PEA concept plan precincts.
- Conflict between the location of high quality vegetation and the proposed school location.
- Slope issues with placement of school oval.
- Bushfire issues along the Coups Creek riparian corridor that limits the ability to develop residential.
- High traffic volume along Fox Valley Road and bushfire prone land along Coups Creek riparian corridor result in an oversupply of land suitable for commercial development.
- Fox Valley Road bisects the main area of the site, making a cohesive layout difficult.
- Redevelopment options explored adjacent to the retirement area along Mt Pleasant Ave.

#### **Option 2**

- Road layout reconfigured to move traffic to edge of the central area, allowing for a campus-oriented layout. Through-site movements on Fox Valley Road limited to busses and pedestrians.
- Oval location moved to flatter, more accessible land that does not interfere with high quality vegetation.

#### **Option 3**

- Option 3 is a further refinement of Option 1.
- APZs refined to account for special uses (i.e. schools, hospitals, etc.)
- The refined APZs limit the opportunities for the location of the school and faculty of nursing.
- Fox Valley Road retained as the primary through-site traffic link.
- School location moved to allow for a consolidated campus that is not bisected by Fox Valley Road and to keep it out of the special uses APZ.
- Explored increased development in the southeast.

#### **Option 4**

- Option 4 is a further refinement of Option 2.
- APZs refined to account for special uses (i.e. schools, hospitals, etc.)
- The refined APZs limit the opportunities for the location of the school and faculty of nursing.
- Reconfigured road layout to bypass central area of the site is further refined based on feedback from traffic consultant.

#### **Option 5**

- Option 5 is a synthesis of what was learned through the development of Options 1 – 4.
- Fox Valley Road is retained as the primary through-site traffic link due to traffic concerns.
- The school is located on a consolidated campus to the north/northwest of Fox Valley Road in order to protect high quality vegetation while locating the oval adjacent to a riparian corridor.
- Faculty of nursing is located adjacent to the hospital and the village centre to allow for easy connections for students.
- Redevelopment in precinct along Mt Pleasant Ave. limited due to bushfire constraints.
- Development area to the southeast is reduced to protect vegetation and mitigate slope issues.

The proposed concept plan is a further refinement of Option 5, with particular attention to ensuring the layout reflects principles that contribute to the creation of a sense of place within each precinct.

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The options also consider the following:

### ***Building Form***

The scale of the existing built form in and around the site was examined to integrate the proposed development through appropriate response and transition in the built form. Refining the development footprint allowed the site to be broken into designated precincts.

Through careful site planning and design a series of open spaces and building footprints were established to maximise solar access, minimise overshadowing and achieve adequate building separation. The building envelopes allow a transition of forms between the large mass of the hospital to the lower density residential development at the peripheries and adjacent to the site.

The built form treatment along Fox Valley Road reflects a transition in the scale of the hospital and the residential development adjoining the site. The proposed built form and public domain along Fox Valley Road reflects the level of activity in this area created by the redevelopment.

### ***Dwelling Diversity and Building Typologies***

The options critically address dwelling diversity through higher of resolution of building typologies than provided in the PEA. By adapting the building typologies, the concept plan provides a greater mix of housing types. Additionally building typologies reflect topography, orientation, relationship to other buildings, access and car parking requirements.

A higher resolution of the building footprint in option 5 allowed refinement of the yield and mix of dwellings. Visual impact and density considerations were explored particularly in relation to integrating buildings towards the edge of the site.

### ***Access and Movement***

Access and movement has been examined to ensure the integration of pedestrian and cycle priority with improved vehicular circulation and parking. The potential to improve the access and movement with and around the site has been incorporated into the road network.

### ***Open Space and Landscape***

Readily accessible open space is a key theme. A hierarchy of open space provides active and passive recreation opportunities with improved pedestrian, cycle and vehicular access.

Large areas of open parkland take advantage of the woodland setting, whilst residential courtyards provide intimate spaces for residents. Tree lined pedestrian avenues and boulevards further enhance movement around the site.

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## 8 THE PREFERRED CONCEPT PLAN

### 8.1 Introduction

The Concept Plan establishes the vision, planning framework and development parameters which will guide the future development of the site over the medium to long term. The Plan will be used by the consent authority in conjunction with the recently gazetted SSS to assess future development proposals within the Wahroonga Estate.

This section of the document establishes the key development objectives and outcomes that underpin the development of the Wahroonga Estate and recommends strategies to achieve these outcomes. These strategies result in actions which are detailed in the Statement of Commitments.

The Concept Plan is a blueprint for the future development of the Wahroonga Estate. It demonstrates, through a series of strategies, how the components of the project can lead to the sustainable development of the site.

Table 7 – Schedule of Changes

	Exhibition	Proposed PPR (Sept 2009)	Final PPR (Jan 2010)
Dwelling Yield	1240 dwellings	1255 dwellings	1038 Dwellings total (student, hostel, seniors and standard) of which 500 are Standard Dwellings.
Conservation	18 ha	23.7 ha Environmental Conservation and 9.2 ha Environmental Management (majority of Residential East Precinct has been deleted as well as two buildings in Fox Valley Precinct)	31.4 ha Environmental Conservation. Deletion of Environmental Management Zone.
Environmental Management		Introduced as a transition zone between urban areas and the E2 zone.	Deletion of Zone.
Mixed Use Zone	Neighbourhood centre zoned Mixed Use.	Deleted, replaced with Neighbourhood Centre Zone.	No change from Proposed PPR.
SP2 Zone	Zone covers only Hospital Precinct.	Expanded to include hospital-related residential and faculty of nursing to south.	No change from Proposed PPR other than realignment of edge of with revised vegetation line.
R1 Zone	All residential land zoned R1.	Some R1 areas deleted and replaced by R2 zone.	No change from Proposed PPR other than realignment of edge of with revised vegetation line.
School	Oval partially in area existing vegetation.	Oval and portion of school reconfigured to allow retention of greater vegetation.	Relocated along Fox Valley Road due to bushfire constraints and oval location shifted as result of Conservation Boundary.
Central Church Precinct	6 storey height limit with height limit decreasing nearer to Fox Valley Road and school.	Area reconfigured to accommodate relocation of school oval. Height limit retained at 6 storeys in discrete areas away from Fox Valley Road and school to maximise opportunity at the same time as ensuring compliance with SEPP 65.	Area reconfigured due to vegetation / bushfire constraints. Retention of additional existing houses.

Fox Valley Precinct	4 storey apartment blocks set in 2 rows of blocks.	2 buildings in second row near EEC deleted. 4 storey height limit maintained along Fox Valley Road, with 6 storeys set behind as topography slopes down. Additional apartment block to the north with removal of 2 houses. APZ in areas of existing managed or cleared vegetation.	Area reconfigured due to vegetation / bushfire constraints. 4 storey height limit. Retention of additional existing houses.
Mt Pleasant Precinct	A mixture of senior's living, townhouses, apartments, and existing houses.	Osborn Road deleted. A mixture of senior's living, townhouses, some apartments, and existing houses. Some apartment blocks near site boundary deleted and replaced with townhouses to be more sympathetic with surrounding existing development. Moved remaining apartments to maximise vegetation retention and connectivity.	Reduction in apartments due to vegetation / bushfire constraints.
Residential East Precinct	97 dwellings	Majority of proposed development deleted and designated Environmental Conservation. 2 additional dwellings only.	Reduction in APZ

The project aims to upgrade and expand the health facilities and services on the site. The hospital related scope of works (subject to project approval) includes a new 23-hour Ward, new Clinic, additional specialist suites and theatre expansion. The hospital itself is intended to grow by up to fifty percent from that existing.

The intention is that external investment in the commercial, residential and research components of the development will provide additional capital to fund the expansion and operation of the hospital and associated health facilities as required.

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## 8.2 The Concept Plan (for which approval is currently sought)

Approval is not currently sought for individual building designs. Rather, Concept Plan approval is sought only for the following key development parameters.

- A coordinated precinct plan outlining future growth areas for each user of the site;
- Conceptual road design and traffic management options;
- Maximum gross floor areas for each precinct;
- Broad land use distribution across the development allotments;
- Landscape, open space and public domain concepts; and
- General building heights, build-to lines and setbacks.

Approval for the final designs developed within these parameters will be obtained in the future under separate Project Approvals.

The overall Concept Plan for the site is shown in **Figure 19**.

## 8.3 The Preferred Concept Plan

### 8.3.1 Initial Amendments

A number of amendments were made to the Concept Plan as exhibited in response to the submissions received throughout this exhibition period. These include the removal of the majority of housing in the Residential East Precinct to protect the existing vegetation in that area, as well as the removal of apartment blocks along the northern boundary on Mount Pleasant Avenue. The school playing field has been slightly re-positioned to protect EEC vegetation and the apartments in the Central Church Precinct have been reconfigured to accommodate the new oval position. Two buildings have been removed and some additional height in the Fox Valley Precinct has been added at the rear of buildings where the sloping topography allows for it while maintaining the 4 storey character along Fox Valley Road. These amendments were considered necessary to ensure a successful and viable outcome. Additionally, further investigations have been undertaken with regards to bushfire protection and flora and fauna mapping. Importantly, amendments have also included the removal of the Osborn Road link.

### 8.3.2 Final Amendments

The gazettal of the SSS listing on 18 Dec 2009 included amendments to the development parameters across the site. The concept plan has been amended accordingly, including:

- Retention of additional vegetation;
- Realignment of APZ's due to retention of additional vegetation;
- Reconfiguration of apartment buildings due to revised APZs;
- Relocation of school due to Revised APZs;
- Height limited to 4 storeys in Fox Valley Precinct;
- 4 storey height limit buffer in Neighbourhood Centre expanded; and
- Reduction in dwelling yield in accordance with SSS listing.





- Site Boundary
- Watercourses
- Detention Basins
- Existing Vegetation
- Existing Vegetation Managed
- Proposed Tree Planting
- Residential
- Seniors Living
- Educational
- Place of Public Worship
- Mixed Use
- Hospital and Hospital Related
- Commercial
- Existing Building Envelopes

Figure 19 – The Concept Plan



Figure 20 - Perspective looking south west



Figure 21 - Perspective looking north east



Figure 22 - Perspective looking north west



Figure 23 – Artists impression of Fox Valley Road and school and residential blocks



Figure 24 – Artists impression of internal road in Central Church precinct and residential blocks



Figure 25 – Artists impression of Neighbourhood Centre from Fox Valley Road

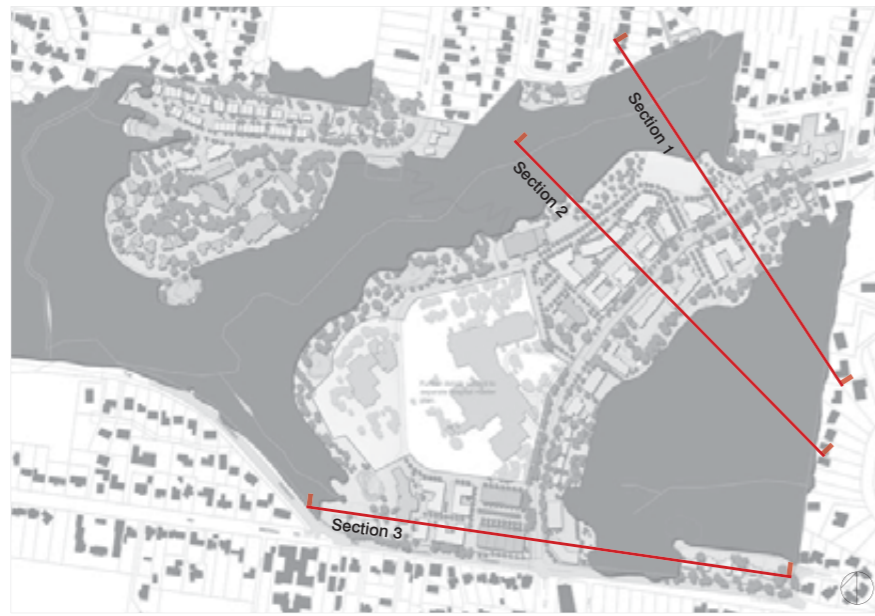


Figure 26 – Section locations (not to scale)

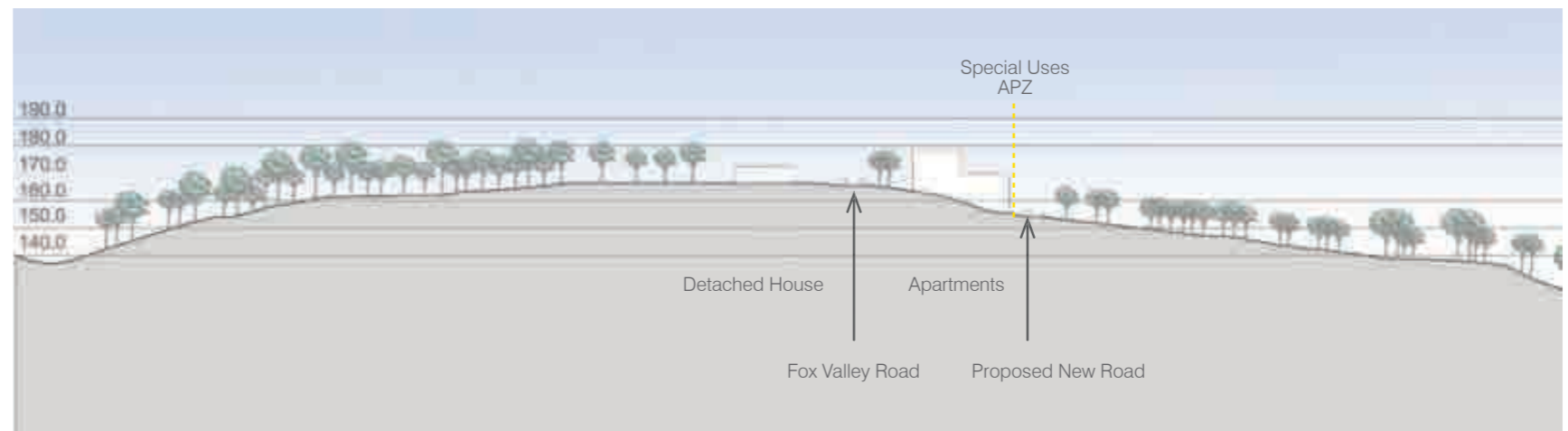


Figure 27 – Section 1

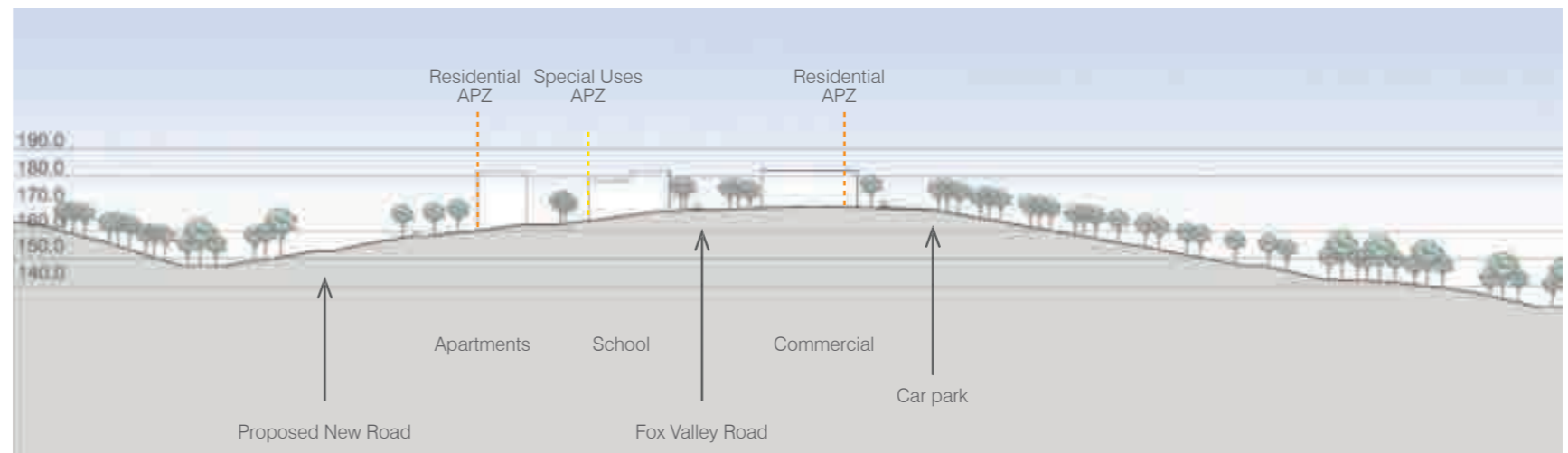


Figure 28 – Section 2

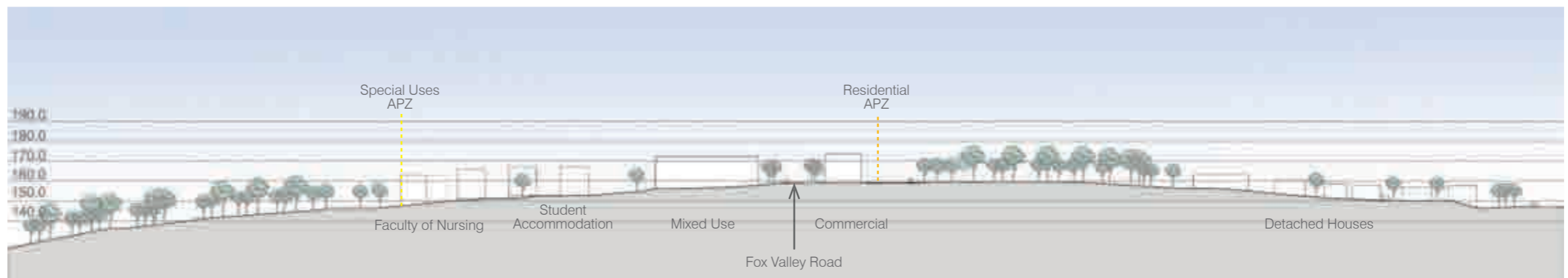


Figure 29 – Section 3



Figure 30 – Section locations (not to scale)

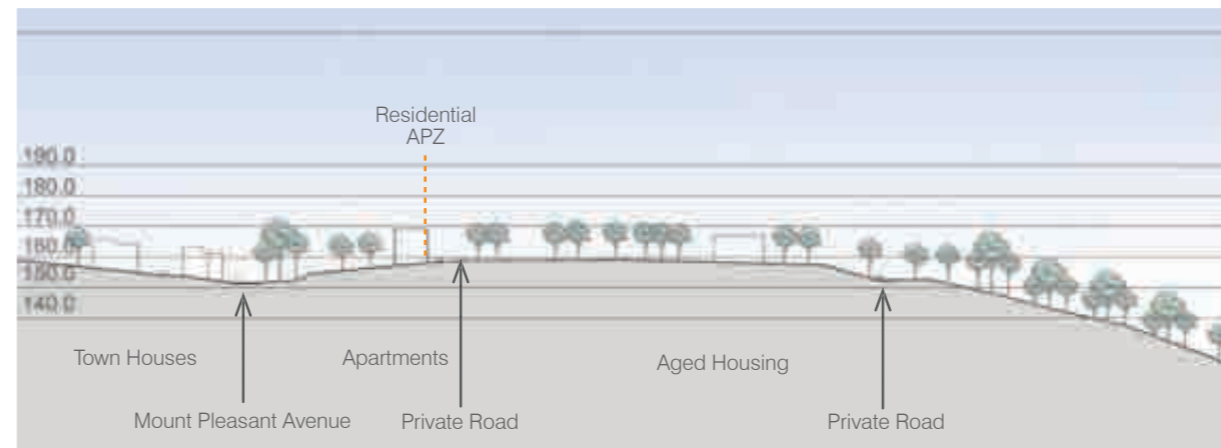


Figure 31 – Section 4



Figure 32 – Section 5



Figure 33 – Section 6



## 8.4 Land use and floor area

### 8.4.1 Land use

The proposed land usage in the Concept Plan has been grouped into precincts, as identified in **Figure 34**. Detail of the proposed land uses within each precinct, for which approval is sought, is identified in **Table 8**.

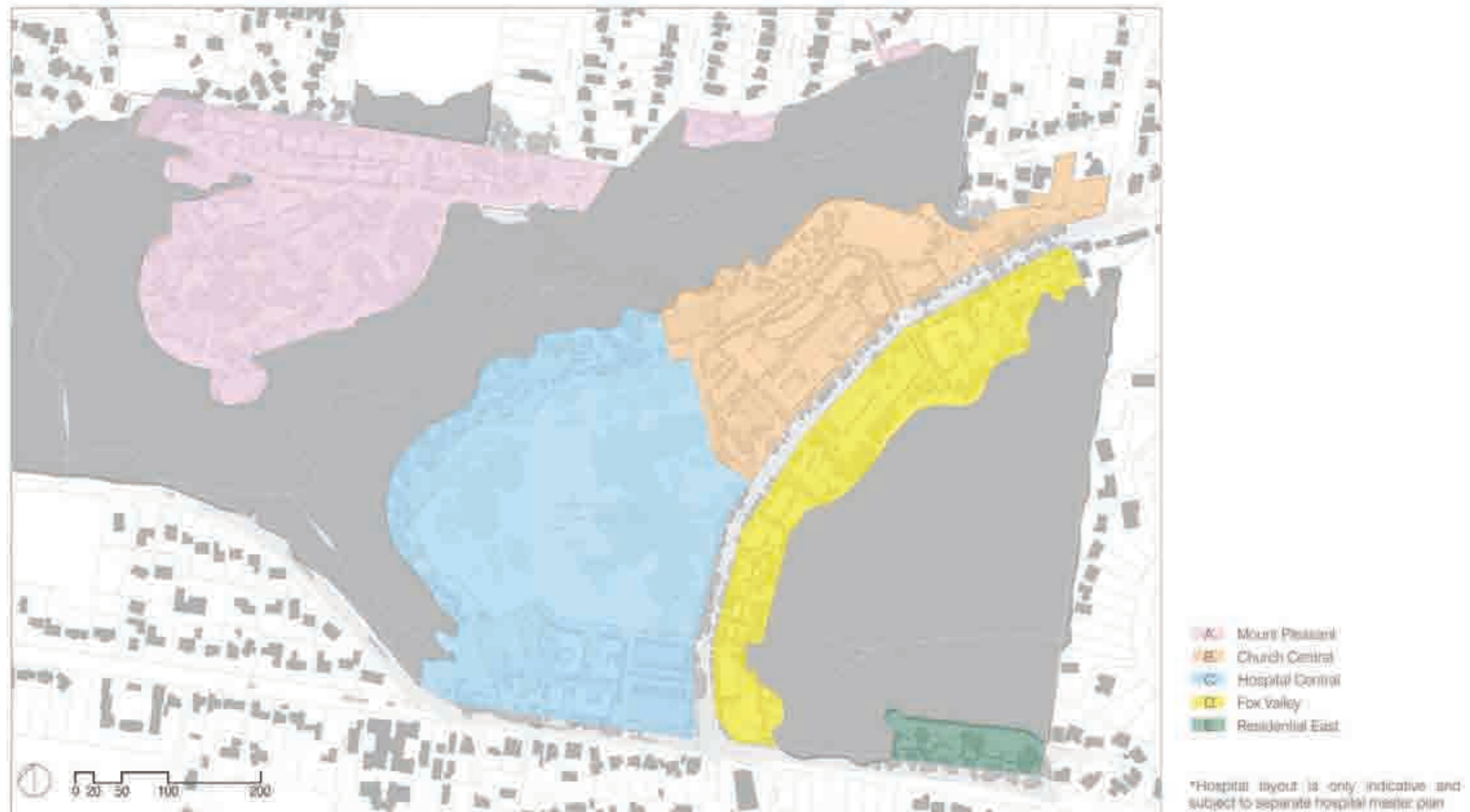


Figure 34 – Precinct Plan

Table 8 – The Concept Plan

Precinct	Type of use	Existing development	Proposed development
All	Open space, recreation and conservation	Informal use of undeveloped areas and existing bushland (privately owned land)	Approx 31.4ha land to be zoned Environmental Conservation with improved public access and management. Clearly defined active and passive recreation areas throughout development precincts.
Central Hospital	Hospital	Sydney Adventist Hospital and facilities – 66,000m <sup>2</sup> <ul style="list-style-type: none"> <li>• Inpatient beds – 345 beds</li> <li>• Intensive care unit – 12 beds</li> <li>• Coronary care unit – 11 beds</li> <li>• Day beds – 96 beds</li> <li>• Renal dialysis chairs – 14</li> <li>• Birthing – 8 suites</li> <li>• Cardiac catheter laboratory – 3</li> <li>• Endoscopy theatres – 2</li> <li>• Operating theatres – 12</li> <li>• Clinical activities including dental care</li> <li>• Faculty of Nursing including auditorium, conference space and library</li> <li>• Australasian research unit</li> <li>• Nurses residence</li> <li>• Child care centre</li> <li>• Chapel</li> <li>• Staff cafeteria</li> <li>• Staff amenities including swimming pool</li> </ul>	Upgrade and expand existing facilities over the short to medium term by an additional 28,000m <sup>2</sup> – 94,000m <sup>2</sup> in total. Details to be subject of a separate application to follow. Faculty of Nursing to be expanded to 3,500m <sup>2</sup> and relocated to within a dedicated facility within the Central Precinct
	Commercial	nil	1,000m <sup>2</sup> in proposed neighbourhood centre
	Retail	Minor retail (hospital support services including pharmacy, book store, San cafe) 1,000m <sup>2</sup> located in hospital precinct.	A total of 2,000m <sup>2</sup> of neighbourhood retail, that may include transferral of existing retail within the hospital building
	Residential	<b>Student Style Accommodation</b> 240 student beds Jacaranda Lodge - 30 rooms Mission Hostel - 17 rooms  <b>Dwelling Houses</b> 6  <b>High density (residential flat buildings)</b> nil	<b>Student Style Accommodation</b> 90 studios 11 x 1 bedroom 200 student / hostel rooms Jacaranda to be refurbished – 30 rooms Mission to be relocated – 12 rooms  <b>Dwelling Houses</b> 3 in total 3 to be retained, refurbished or replaced  <b>High density (residential flat buildings)</b> 105 in total 26 x 1 bedroom 53 x 2 bedroom 26 x 3 bedroom

Precinct	Type of use	Existing development	Proposed development
Central Church	Education	Primary school of approx. 1,200m <sup>2</sup> and catering for approx. 200 students	Allowances for a K-12 school of 9,000m <sup>2</sup> relocated to Precinct 2 and catering for approx. 800 students
	Church	Two churches totalling 1,600m <sup>2</sup>	A centralised church precinct catering for 3,200m <sup>2</sup> floor space
	Residential	<b>Dwelling Houses</b> 19  <b>High density (residential flat buildings)</b> nil	<b>Dwelling Houses</b> 9 in total 9 to be retained, refurbished or replaced  <b>High density (residential flat buildings)</b> 200 in total 50 x 1 bedroom 100 x 2 bedroom 50 x 3 bedroom
Residential East	Residential	<b>Dwelling houses</b> 4  <b>Medium density (town houses)</b> nil  <b>High density (residential flat buildings)</b> nil	<b>Dwelling houses</b> 6 in total 4 to be retained, refurbished or replaced 2 new dwelling houses proposed  <b>Medium density (town houses)</b> nil  <b>High density (residential flat buildings)</b> Nil