

MODIFICATION REQUEST: Sydney Adventist Hospital Lot 621 DP 1128314, Fox Valley Road, Wahroonga. (MP10\_0070 MOD1)

- Revised layout to temporary car park to provide 413 spaces;
- Alteration and reconfiguration of western atgrade car park to provide 84 spaces;
- Alteration to the design and location of approved multi-deck car park to provide 896 spaces; and
- Revised entry building to improve patient, visitor and staff movements and circulation.

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

December 2011

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### **EXECUTIVE SUMMARY**

This is an assessment of a Modification Application (MP10\_0070 MOD 1) prepared by MacroPlan Australia on behalf of Sydney Adventist Hospital Ltd (SAH) (the proponent) requesting modifications to the existing project approval (MP10\_0070) for expansion of the Sydney Adventist Hospital, to amend the layout and increase the capacity of the temporary car park, alter and extend the layout of the western car park, modify the setback, scale and capacity of the multi-deck car park and revise the building entry from the multi-deck car park.

The Modification Application was made publicly available on the department's website, and consultation was undertaken with Ku-ring-gai Council. One submission was received from Ku-ring-gai Council objecting to the proposed modifications to the multi-deck car park.

The department has assessed the merits of the proposed modification and is satisfied that the proposed modification is justified and any resultant environmental impacts can be adequately mitigated and managed.

The department recommends that the proposed modification application be approved subject to various amendments to the conditions.

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## 1. BACKGROUND

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

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

The project location is shown in Figure 1.

### Figure 1: Project Location



Construction works for the first stage of the development have commenced, including atgrade works for temporary car parking and access arrangements. Additional Stage 1

works, including the multi-deck car park and new entry building, are subject to the current modification proposal. Refer to Figure 2 for the approved project layout.



Figure 2: Approved Project Layout

The proposed modification is in response to the hospital's desire to facilitate an efficient and improved construction process and to achieve better operational outcomes for the future patients, visitors and staff of SAH.

#### **PROPOSED MODIFICATION** 2.

## 2.1 Modification Description

The proposed modification includes:

- revised layout and extension to the temporary at-grade car park to provide for 413 spaces (an additional 155 spaces);
- alteration and reconfiguration to the layout of the permanent western at-grade car parks to provide a total of 84 spaces (reduction of 2 spaces);
- alteration to the approved multi-deck car park and arrival podium to provide for 896 spaces, and moving the structure closer to the hospital buildings to allow for pedestrian access to the hospital at all levels;
- revised entry building and deletion of concourse building, to better integrate the multi-deck car park to the hospital buildings, connecting all levels of the car park with the hospital to optimise patient, visitor and staff circulation to hospital facilities; and

> revised design of the entry to the Clifford Building linking to the proposed entry building, (involving the deletion of the approved Chapel and retaining the existing Chapel at its current location inside the hospital entrance).

The proposed modified layout is shown in Figure 3.





## 3. STATUTORY CONTEXT

### 3.1 Modification of the Minister's Approval

Section 75W(2) of the *Environmental Planning and Assessment Act 1979* (the EP&A Act) provides that a proponent may request the Minister to modify the Minister's approval of a project. The Minister's approval of a modification is not required if the approval of the project as modified would be consistent with the original approval. As the proposal involves modifications to the capacity and configuration of the permanent and temporary at-grade car park, the design and scale of the multi-deck car park and to the entry building and conditions relating therein, the modification will require the Minister's approval.

### 3.2 Environmental Assessment Requirements

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

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## 3.3 Consistency with Wahroonga Estate Concept Plan

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

The proposed modifications to the multi-deck car park do not impact on the approved maximum building height. The proposed new entry building includes the deletion of the approved concourse building that results in a reduction to the additional hospital floor space by 353sqm.

### 3.4 Delegated Authority

In accordance with clause 3 of Schedule 6A of the EP&A Act, section 75W of the Act as in force immediately before its repeal on 1 October 2011 and as modified by Schedule 6A, continues to apply to transitional Part 3A projects.

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

The application is being referred to the PAC for determination as Ku-ring-gai Council has lodged a submission objecting to the modification proposal. A political disclosure statement was made from the Sydney Adventist Hospital who lodged a statement in relation the previous project application (MP10\_0070), but not for the current modification application.

## 4. CONSULTATION AND SUBMISSIONS

### 4.1 Exhibition

Under Section 75X(2)(f) of the EP&A Act, the Director-General is required to make the modification request publicly available. The department made the modification request publicly available on the department's website from 12 September 2011 until 26 September 2011 (14 days) and notified relevant State and local government authorities in writing.

The department received only one submission, from Council, during the exhibition of the modification request. A summary of the issues raised in its submission is provided below.

## 4.2 Public Authority Submissions

### Ku-ring-gai Council

Ku-ring-gai Council's submission raised no objections in principle to the modifications to the temporary car park and the western at-grade car parks, subject to recommended conditions.

Council did, however, raise objection to the proposed modifications to the multi-deck car park. A summary of Council's submission is provided below:

Temporary car park

- No objection in principle.

- Sydney Adventist Hospital MOD 1
  - Extent of new works not to exceed the existing footprint of the car park on its northern boundary;
  - No further encroachment on those lands to the northern boundary in terms of works, stormwater and construction material/spillage;
  - A date to be specified when the use of the temporary car park will cease (to coincide with the completion of the multi-deck car park);
  - Documentation to be submitted to show restoration works and use intended for car park area once temporary use ceases; and

- Access ways through car park for bushfire services are to be clearly indicated. *Western at-grade car parks* 

- No objection in principle;
- Landscape drawing to be provided of the new 24 space car park to be submitted specifying planting of 8 mature trees to replace those being removed;
- A detailed drawing is to be provided to show access, location and configuration of the new 60 space car park including landscape bays, similar to the existing adjacent car park; and
- The 60 space car park is to be designed so as not to encroach on the bushland along the eastern boundary.

- Access ways through car park for bushfire services are to be clearly indicated. *Multi-deck car park* 

- Council reiterates their position of objection from their original project application submission regarding the provision of the multi-deck car park above ground;
- Council objects to the modification as the alterations are significant and cannot be considered as minor modifications;
- Council recommends that no modifications to the multi-deck car park be approved as it removes fundamental elements of the original design and that the original approval be reinstated to retain the distance separation between the hospital buildings and car parking structure and other key design features:
- Substantial changes to the bulk, scale and appearance of the multi-deck car park are now proposed; and
- The modifications will generate a loss of amenity, landscaping elements, solar access, aspect and urban spatial quality of the main hospital entry.

Entry Building

Council does not object to the enclosure of the entry area off the arrival podium, but objects to its connection with the multi-deck car park and impact on the amenity and visual character of the main entry point of the hospital.

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

## 5. ASSESSMENT

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

- Built form and urban design;
- Access and car parking; and
- Amenity.

### 5.1 Built Form and Urban Design

### Multi-deck Car Park

The proposed modifications to the multi-deck car park seek to combine the approved 5/6 split-level car parking structure and 2 level arrival podium together and integrate car parking and patient drop-off into a single 6 level structure. As can be seen in Figures 4 and 5 below, the multi-deck car park was separated from the rear of the CSB hospital building in the approved design by the arrival podium. In the amended design, the podium is integrated into the car park.

As a consequence the height of the modified structure will increase by only 0.2m and the width of the approved multi-deck car park and arrival podium is reduced from approximately 52m to a combined width of approximately 32m (see Figures 4 and 5). It should be noted, however, that the structure's overall maximum height (RL177.05) will be approximately 4m higher than the approved maximum height (RL173.2) as less excavation is proposed in the construction of the modified multi-deck car park.



#### Figure 4: Approved multi-deck car park



The amended design reduces the separation of the car parking structure from the adjacent CSB and SAN Clinic hospital buildings from 18m to 12m. The setback of the multi-deck car park to the bushfire prone vegetation at the rear of the site will also be increased to outside of the 50m defendable space, thereby reducing the structure's exposure in the event of a bushfire. The length of the car parking structure is

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increased by approximately 30m, projecting just beyond the existing walkway between the CSB and SAN Clinic building (see Figures 6 and 7).



Figure 6: Approved Multi-Deck Car Park – Level 2





As a consequence of the amended multi-deck car park design, pedestrian access for patients and visitors would be provided from all levels of the car park to each level of the adjacent CSB hospital building through the proposed entry building. This will eliminate the necessity for patients and visitors to navigate to Level 2 of the multi-deck car park prior to entering the hospital, as was required in the original approval.

Council raised concerns that the relocation and approximate 4m relative height increase would result in a substantial increases to the bulk and scale of the car parking structure. The department acknowledges that the approved eastern and western elevations would have provided a greater sense of separation from hospital. However, the bulk and scale of the approved design would still have been evident from these locations. The proposed amendments shift the built form closer to the hospital, but retain a similar bulk and scale that is better integrated into the hospital campus and its associated functions.

Furthermore and as outlined above, the increase in height to the actual structure is only 0.2m and the proposed height increase in the context of the approved future built form of the CSB expansion, approximately 26m higher, is not considered to be significant.

The revised location of the multi-deck car park will provide increased opportunities for landscaping and tree retention within the separation between the multi-deck car park and existing hospital buildings, as confirmed by the proponent. Accordingly, a new condition is recommended requiring an amended landscaping plan be submitted to the department prior to the issue of the construction certificate for the multi-deck car park, detailing revised landscaping and trees proposed to be retained.

While the proposed amendments to the multi-deck car park reposition the built form of the car parking structure closer to hospital buildings, the department is satisfied that the proposed amendments would not detrimentally add to the bulk and scale of the hospital redevelopment, but rather help to integrate the structure into the expanded CSB building and consequently provide a greater setback to the existing bushfire prone land at the rear. The development is largely contained within the existing SAH campus footprint, with the existing bushland reserve behind the property screening much of the hospital's built form from surrounding residential areas to the north of the subject site. The department raises no objection to the amendments to the multi-deck car park and considers the design modifications satisfactory.

#### **Entry Building**

The new entry building, which encompasses 4 lifts, is proposed to provide improved pedestrian access for patients, visitors and staff, directly from each level of the multideck car park into the CSB hospital building adjacent. The entry building will also provide a direct linkage from Level 4 through to the existing main hospital entry and patient admissions area of the Clifford Building and Village Green (see Figure 8).



#### Figure 8: Proposed Entry Building

The proposed entry building, in conjunction with the modified multi-deck car park, continues to provide the key design and access functions from the original approval – i.e. linking the car park with the hospital buildings, main hospital entry and providing a sheltered patient drop-off and pedestrian access. The sense of arrival is also still provided for patients arriving to the hospital via the drop-off zone, which integrates with the entry building lift foyer, allowing patients, visitors and staff to access different levels of the hospital.

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The approved design requires pedestrians to navigate the multi-deck car park to the concourse forecourt at Level 2, prior to entering the hospital via the concourse building on Level 2 only. However, the integration of the multi-deck with the arrival podium has removed the necessity for the forecourt and concourse building, enabling the entry building to provide direct access to the hospital from all levels of the multi-deck car park.

The proposal also involves the relocation of the café space adjacent to the Clifford Building hospital reception/entry, providing an outlook for visitor and patients towards the Village Green. The approved new Chapel building is also sought to be deleted, with the existing Chapel within the Clifford Building being retained.

Council raised concerns that the proposed amendments do not enhance the quality of the main hospital entry, however, the proponent has stated that the former concourse or current proposed design of the entry building were never intended to be the "main entry" of the hospital. Architecturally, the main hospital entry was and remains at the front of the hospital site, in the Clifford Building on Level 4 and oriented to the Village Green.

The proposed entry building lift core will require the relocation of bicycle parking, approved at Level 1 adjacent to the approved medical records room. Accordingly, a new condition is recommended requiring details to be provided to the department showing a suitable revised bicycle parking/storage location of similar size and capacity, prior to the issue of the construction certificate for the entry building works.

The department raises no objections to the form and intended function of the proposed entry building. The integration of the structure with the amended multi-deck car park will provide direct pedestrian access from the patient/visitor car parking facility to the hospital. The entry building will provide sheltered and comfortable access to the hospital, linking patients and visitors to the main hospital entry/reception and new café space on Level 4, overlooking the Village Green.

### 5.2 Access and Car Parking

### Car Parking

SAH currently has a total of 1308 car parking spaces available across the hospital site. The major project application provided an additional 750 spaces for the campus resulting in a total of 2058 spaces across the site. Car parking was approved to be constructed at Stages 1a, 1b, 2 and 3.

As approved, Stages 1a, 1b and 2 provide an additional 544 spaces, or a total of 1852 spaces, prior to the approved Stage 3 works. Stage 3 works involve the redevelopment of the new Shannon Wing (+206 spaces).

The proposed modification seeks to allow the construction of car parking, previously approved in Stages 1a, 1b and 2 (excluding the 4 additional education centre car parking spaces), in a new Stage 1 scope of works.

Under the proposed modifications, Stage 1 is proposed to provide a total of 1842 spaces, including the multi-deck/arrival podium (896 spaces), retention of existing atgrade car parking (116 spaces) and the western car park extension (84). The revised parking arrangements provide an additional 534 spaces above the existing 1308, resulting in a loss of 6 parking spaces from that previously approved within

MP10\_0070. The loss of these 6 car parking spaces is not considered detrimental to the future operations and functions of the hospital.

Approved access arrangements into the site are not proposed to be modified under the current modification application.

### Multi-Deck Car Park

The amended multi-deck car park design, including the arrival podium, is proposed to provide 896 parking spaces, 26 spaces less than the approved structure. The loss of spaces is generated partially by the amended design and its integration with the arrival podium, provision of additional disabled parking spaces and location of internal boom gates. The loss of multi-deck spaces is offset by the additional at-grade parking spaces that are able to be retained due to the proposed amended position of the car parking structure.

The proposed integration of the multi-deck car park with the arrival podium would enable the retention of an existing section of at-grade car parking, located adjacent to the bushland reserve at the rear of the site and remove the requirement to construct the approved new access road adjacent to the bushland. An additional 4 disabled parking spaces, providing a total of 30, are also proposed, improving accessibility for all patients and visitors.

#### **Temporary Car Park**

The capacity of the temporary car park is proposed to be increased from 258 spaces to 413 spaces (+155) in response to a desire from the hospital to minimise the disruption to existing car parking services that will be lost during the construction phase. The extent of the amended car park will not encroach any further into its northern setback or the adjoining bushland.

The approved temporary car park was to be constructed during Stage 1A works and provide the necessary car parking to offset spaces lost during the construction of the approved multi-deck car park, also to be constructed during Stage 1A works. The arrival podium was approved to be constructed later during Stage 2 works. Details provided within the original EA show that the temporary car park was to cease use once the multi-deck car park is constructed after Stage 1A works.

Under the current proposal, the car parking works from Stages 1a, 1b and 2 are proposed to be completed at the same time, impacting on approximately 562 spaces, predominantly at the rear where the multi-deck and arrival podium structure are proposed to be constructed. In this respect, the department considers the increase in the capacity of the temporary car park to be an appropriate and satisfactorily offset for the impact on other parking spaces within the immediate surrounds of construction activities.

Council requested that a specific date be provided when the use of the temporary car park would cease, however, such a condition would be potentially problematic should construction works be delayed. The proponent originally committed to using the temporary car park until such time as sufficient permanent car parking was provided to meet the demand associated with both operational and construction activities. As noted above, the proponent also detailed within the original EA that use of the temporary car park cease upon completion of the multi-deck car park.

As the current modification application proposes to integrate the multi-deck car park with the arrival podium and rear at-grade car parking, the completion of these works will provide approximately 890 spaces, which is considered sufficient. Accordingly a new condition is recommended requiring the proponent to cease use of the temporary car park upon completion and prior to the issue of the occupation certificate for the multi-deck car park. The temporary car park area will be required to be restored to its original state no later than three months following the issue of the multi-deck car park occupation certificate.

### **Permanent Western Car Park Extension**

The approved permanent western car park included a new car park between the existing Beattie Building and existing western car park and a southern extension to the existing western car park providing 86 additional spaces.

The proposed modifications involve reconfiguring the layout and reducing the capacity of the car park adjacent to the Beattie Building, from 46 to 24 spaces due to engineering difficulties associated with the topography and service infrastructure. The southern extension to the existing western car park is proposed to increase its capacity to 60 spaces, resulting in a loss of 2 spaces, which is considered minor.

The department considers the proposed modifications to the form of the western atgrade car parks are minor in nature and will not detrimentally impact on hospital parking provisions or impact on the existing vegetation located within the E2 zone adjacent. The minor car park extension works are satisfactorily screened from Comenarra Parkway by existing vegetation along the site boundary.

### 5.3 Amenity

Council raised concerns regarding the impact the proposed design amendments to the multi-deck car park and entry building would have on the amenity of the hospital entry, sense of arrival, adjoining hospital buildings, namely the CSB and SAN Clinic Building, landscaping opportunities and on the visual outlook to the bushland reserve at the rear of the hospital site.

As noted by the proponent, the main hospital entry will remain at the front of the hospital site, overlooking the Village Green. The new hospital entry at the rear of the site, as approved, was designed to create a more pleasing and functional entrance for patients and visitors arriving by car and improve access to the main hospital buildings. This is retained within the proposed amended design. External glazing is proposed for the exterior of the entry building, offering visitors and patients views of the bushland reserve to the north of the site (see Figure 9).

The minor increase in height of the amended multi-deck car park design will not result in a significant impact on the existing bushland reserve outlook from the existing or proposed hospital buildings adjacent. Views to the bushland are retained from Level 5 and above, while the original approved multi-deck car park would have provided Level 4 with partial views towards the rear of the site. The loss of views from Level 4 is not considered detrimental to the future operation and functions of the hospital, with only endoscopy and day surgery medical procedures undertaken on Level 4 of the CSB adjacent. Importantly, views from the future hospital wards within the CSB expansion development will remain unobstructed.

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The original approved multi-deck car park was setback 18m from the existing hospital buildings, while the arrival podium structure was setback only 3m at Level 2. The revised integrated design now provides a consistent setback of 12m between the car parking structure and existing hospital buildings, providing for a more expansive area for landscaping. As noted above, a condition is recommended requiring the proponent to provide an amended landscaping plan complementary of the amended design.

The department considers the amendments to the design of the multi-deck car park and entry building will not detrimentally impact on the amenity of the hospital. Appropriate conditions are recommended to ensure additional landscaping is achieved within the building separation areas.

### 6. CONCLUSION

The proposed modification seeks approval for a revised layout and extension to the temporary at-grade car park, alteration and reconfiguration of the permanent western at-grade car parks, alteration to the approved multi-deck car park, and a revision to the entry building connecting the multi-deck car park and hospital.

The department has reviewed the proponent's modification request and accompanying amended plans and considers the key issues to be built form and urban design, access and parking and amenity.

In assessing the key issues, the department considers that the proposed modifications to the multi-deck car park and entry building will improve the integration and physical connection of the car parking facilities with the rest of the hospital, whilst ensuring that pedestrian accessibility is improved. The proposed modifications to car parking provisions for the hospital site will ensure that the hospital campus can continue to satisfactorily function during the redevelopment phases of the campus and following its completion and subsequent operation.

## 7. RECOMMENDATION

The department recommends that the PAC:

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

Heather Warton Director METROPOLITAN AND REGIONAL PROJECTS NORTH

1211

Chris Wilson **Executive Director** MAJORS PROJECTS ASSESSMENT

Richard Pearson  $\begin{bmatrix} 2 \\ 1 \\ 2 \end{bmatrix}$ Deputy Director-General DEVELOPMENT ASSESSMENT AND SYSTEMS PERFORMANCE