

MODIFICATION REQUEST:
**Sydney Adventist Hospital Alterations
and Additions**
185 Fox Valley Road, Wahroonga
(MP10_0070 MOD 2)

- Modification to the building form of the Clinical Services Building, including an increase in GFA and height.
- Modification to the staging schedule of works.



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

April 2012

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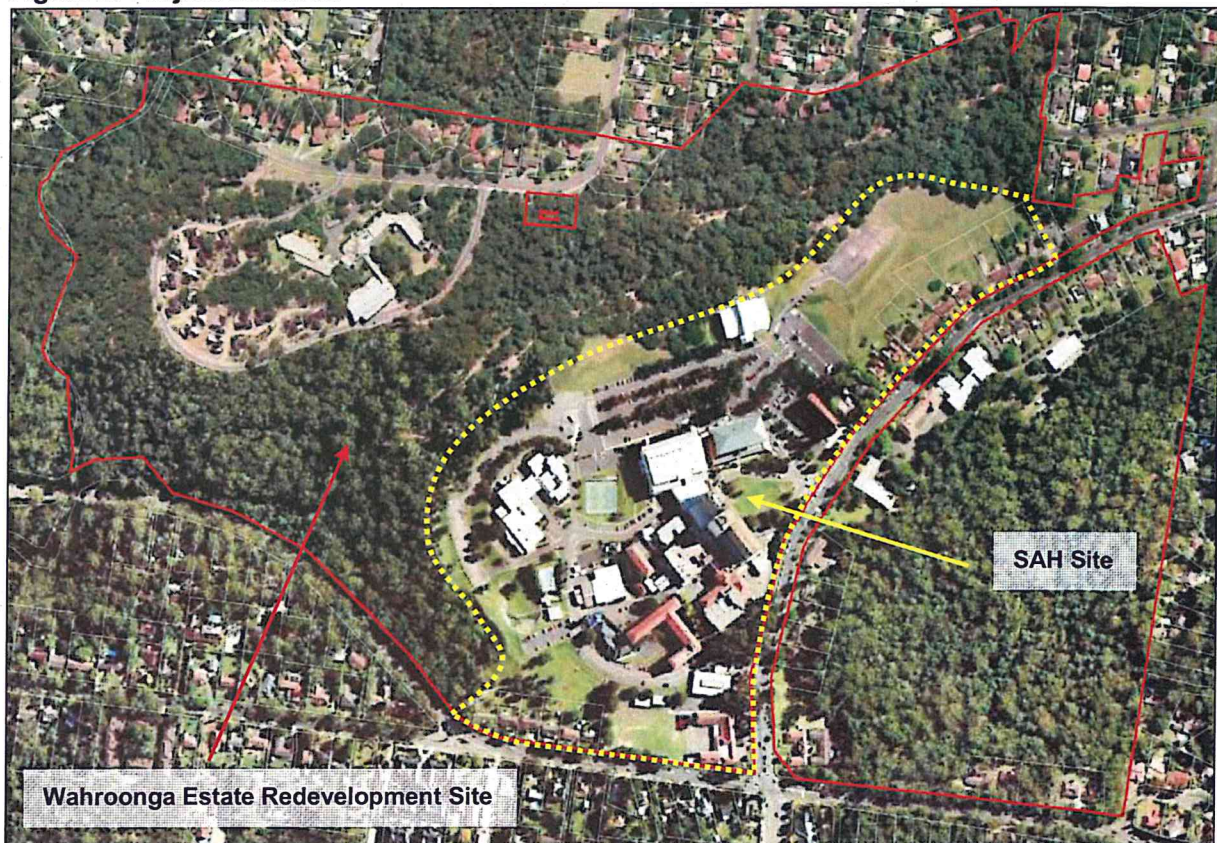
1. BACKGROUND

On 3 March 2011, the Planning Assessment Commission, as delegate for the Minister for Planning and Infrastructure, approved a project application (MP10_0070) for staged alterations and additions to the Sydney Adventist Hospital, Wahroonga. The approval consisted of:

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

The project location is shown in Figure 1.

Figure 1: Project Location

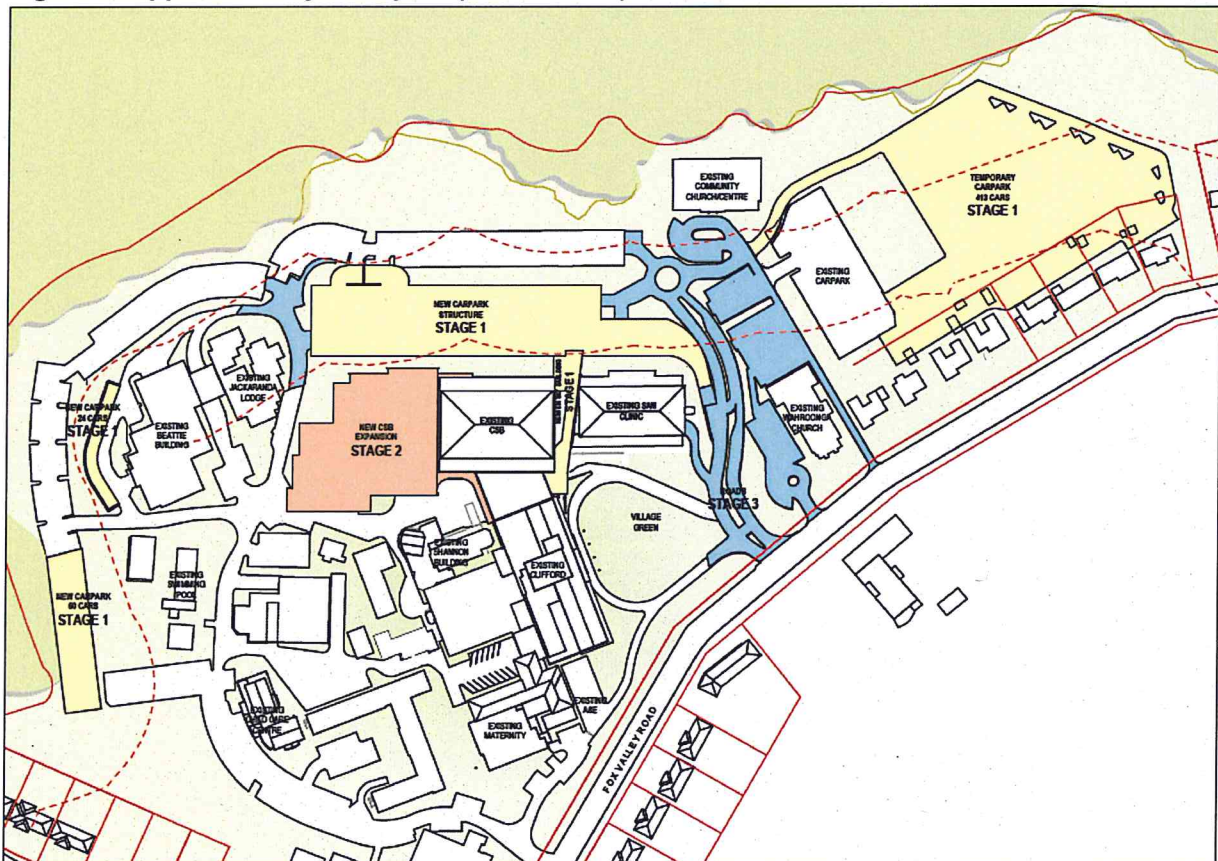


On 23 December 2011, the Planning Assessment Commissions approved modification application MP10_0070 MOD 1, modifying the original proposal as follows:

- 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).

Construction works for the first stage of the development have commenced, including at-grade works for temporary car parking, access arrangements and preparatory works for the multi-deck car park, subsequently amended under the first modification application. Further 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, as amended by MOD 1.

Figure 2: Approved Project Layout (as amended)



2. PROPOSED MODIFICATION

The proposed modification includes (as amended by the proponent's submissions response):

- A 27 space at-grade car park was originally proposed in the MOD 2 application, which has since been deleted from the proposal due to concerns raised by council.

The modification application also seeks to amend the approved stages of development. Stages 1a, 1b and the internal road works and arrival podium works of Stage 2 are now proposed to be undertaken at Stage 1. Stage 2 will retain the proposed education centre that fronts Comenarra Parkway, while Stage 3 will remain unchanged. The proposed amended stages are detailed in Figures 3 to 5.

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EXISTING BUILDINGS

STAGE 1 WORKS

STAGE 2 WORKS

STAGE 3 WORKS

3. STATUTORY CONTEXT

3.1 Modification of the Minister's Approval

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.

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

3.3 State Environmental Planning Policy (Major Development) 2005

The Wahroonga Estate state significant site listing made under Schedule 3 of the Major Development SEPP established land use zonings and maximum building height and gross floor area (GFA) development standards. These controls were adopted within the final concept Plan Preferred Project report prior to determination.

The proposed modifications to the CSB result in a non-compliance with the maximum 39.5 m building height control, with a maximum departure of 3.5 m in parts. Compliance is maintained with the maximum GFA and land use zoning controls.

Notwithstanding this, clause 20 of Part 25 of Schedule 3 of the Major Development SEPP, provides that development standards imposed by the SEPP or any other EPI do not apply to the proposed development if the Director-General is satisfied, and issues a certificate if compliance with the development standard is considered unreasonable or unnecessary and there are sufficient environmental planning grounds to justify the non-compliance. This matter is considered in Section 5.1 of this report.

3.4 Consistency with Wahroonga Estate Concept Plan

The approved concept plan adopted height and gross floor area controls that were established by the Wahroonga Estate listing as a state significant site in schedule 3 of the MD SEPP. In this respect, the definitions of the respective development standards are contained within the Standard Instrument pursuant to clause 2(2) of Part 25 of Schedule 3 of the MD SEPP, which provides that words or expressions used in Part 25 have the same meaning as it has in the standard instrument prescribed by the Standard Instrument (Local Environment Plans) Order 2006.

3.4.1 Maximum Height

The concept plan provides the SAH hospital site with a maximum building height of 39.5 m. The maximum building height for new development on the hospital site was

established to respond to the 12 storey (42 m / RL208.922) height of the existing hospital buildings (Clifford Tower), while taking advantage of the sloping site and providing a sympathetic scale with the surrounding environment.

The proposed modifications to the CSB seek to increase the height of the proposal to a predominant maximum building height of 42.8 m (RL207.00) at the highest point above the natural ground level. This represents a 3.3 m non-compliance from the maximum building height control. Notwithstanding this, the amended design ensures the existing 12 storey Clifford Tower maintains its prominence within the hospital setting, while also providing a built form of a similar scale to that of the future Shannon Building, approved adjacent to the south, at a maximum height of RL207.6.

The proposed height increase of the amended CSB retains the cluster of larger buildings at the centre of the site as envisaged by the concept plan. The department is satisfied that the proposed amended CSB design is consistent with the approved concept plan. Further consideration of the height non-compliance is addressed within Section 5.1.1 of this report.

3.4.2 Maximum Gross Floor Area

The approved concept plan provided the SAH hospital site with the maximum development potential of 28,000 sqm gross floor area. The approval of Major Project MP10_0070 granted consent to the development of 27,993 sqm of floor area. The subject modification application seeks to increase the floor area of the CSB from 18,818 sqm to 19,775 sqm (+957 sqm).

MP10_0070 MOD 1 previously reduced the total SAH gross floor area by 353 sqm in its approval of the new entry building. Furthermore, the proponent advised that based on a recalculation of the floor area of the Shannon Building, previously approved under the original project application, the actual floor area of the Shannon Building's is 8,041 sqm not 8,762 sqm, representing a decrease by 721 sqm. The recalculation of the floor area of the Shannon Building reflects a more accurate calculation based on the Standard Instrument definition of gross floor area.

Based on the reduction to the total gross floor area by the approval of the new entry building, recalculation of the approved Shannon Building gross floor area and the proposed increase in floor area of the CSB, a total gross floor area of 27,876 sqm is now proposed.

This represents a net reduction in SAH total gross floor area by 117 sqm. The proposed total gross floor area for the site remains consistent with the maximum gross floor area approved under the control plan.

3.4 Delegated Authority

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

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

4. CONSULTATION AND SUBMISSIONS

4.1 Exhibition

Under Section 75X(2)(f) of the EP&A Act, the Director-General is required to make the modification request publicly available. The department publicly exhibited it from 14 December 2011 until 31 January 2012 (49 days) on the department's website and at the department's Information Centre and at Ku-ring-gai Council. The modification request was also advertised in the Sydney Morning Herald and Daily Telegraph on 14 December 2011 and Hornsby Advocate on 15 December 2011 and landholders and relevant State and local government authorities were notified in writing.

The Department received six submissions during the exhibition of the modification request – five submissions from public authorities and one submission from the general public. A summary of the issues raised in submissions is provided below.

4.2 Public Authority Submissions

Five submissions were received from public authorities, including Roads and Maritime Services (RMS), the Office of Environment and Heritage (OEH), Rural Fire Service (RFS), Sydney Water and Ku-ring-gai Council.

No objections were raised from any public authority in relation to the proposed amendments to the design of the CSB or the additional car parking spaces. However, Ku-ring-gai Council raised concerns about the proposed location of the additional 27 car parking spaces and associated loss of soft landscaping. It is considered that council's concerns in relation to this issue have been satisfied, given the proponent's decision to delete the additional parking from the current modification request.

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

4.3 Public Submissions

One public submission was received from the general public, raising concerns about the approved Education Centre and future development identified within the approved Wahroonga Estate Concept Plan. These concerns relate to the approved Education Centre and original concept plan and are not relevant to the amendments proposed in MOD 2.

4.4 Response to Submissions

In response to council's concerns, the proponent has deleted the proposed additional 27 car parking spaces from the modification application. No further changes to the modification request are proposed.

5. ASSESSMENT

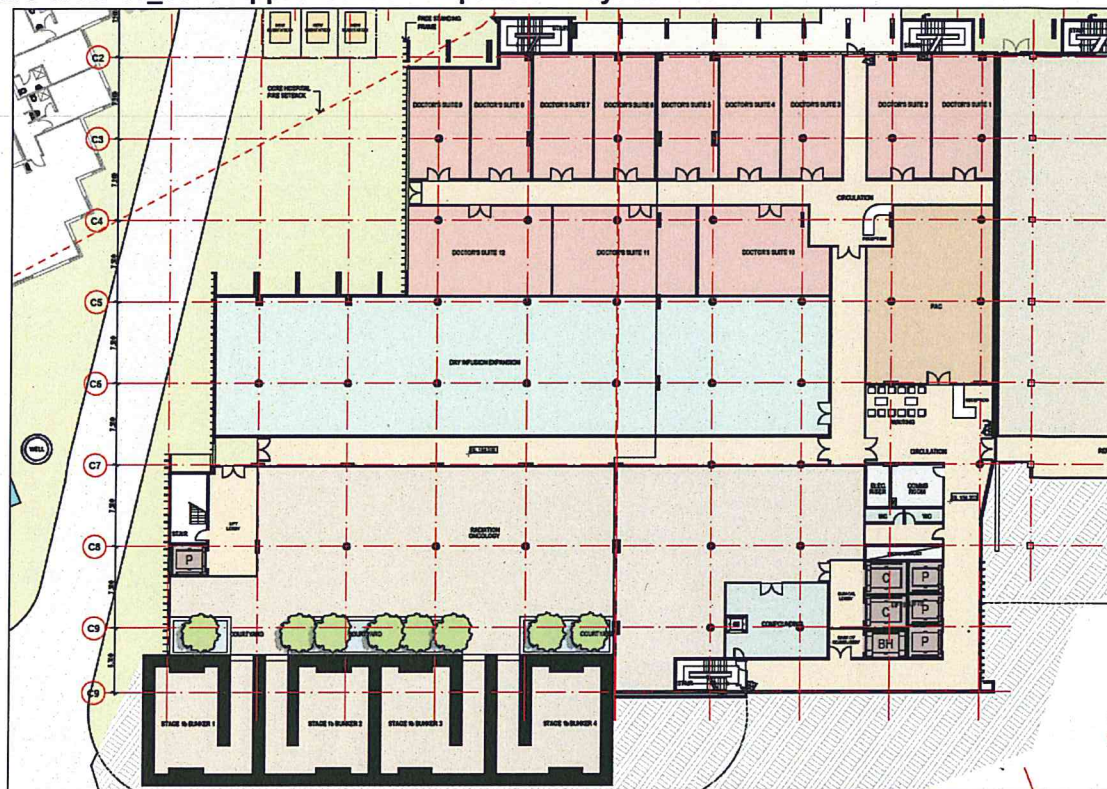
The Department considers the key issues for the proposed modification to be built form and urban design and transport.

5.1 Built form and urban design

5.1.1 Built form

The modification application seeks to amend the CSB by removing the north-western corner of the five floor CSB extension and introducing a new five floor 'L' shape

Figure 6: MP10_0070 Approved CSB Expansion Layout – Level 2



The floor plan is a detailed architectural drawing of the first floor of a building, likely a university or research facility. It features a grid system for orientation, with vertical labels C1 through C9 and horizontal labels 1 through 10. The plan includes a variety of rooms and spaces, such as lecture halls, classrooms, a library, a staff room, and restrooms. The layout is complex, with many corridors and service areas connecting the different functional spaces. The drawing is a black and white line drawing, typical of architectural blueprints.

Figure 8: MP10_0070 Approved CSB Tower – Levels 7-10

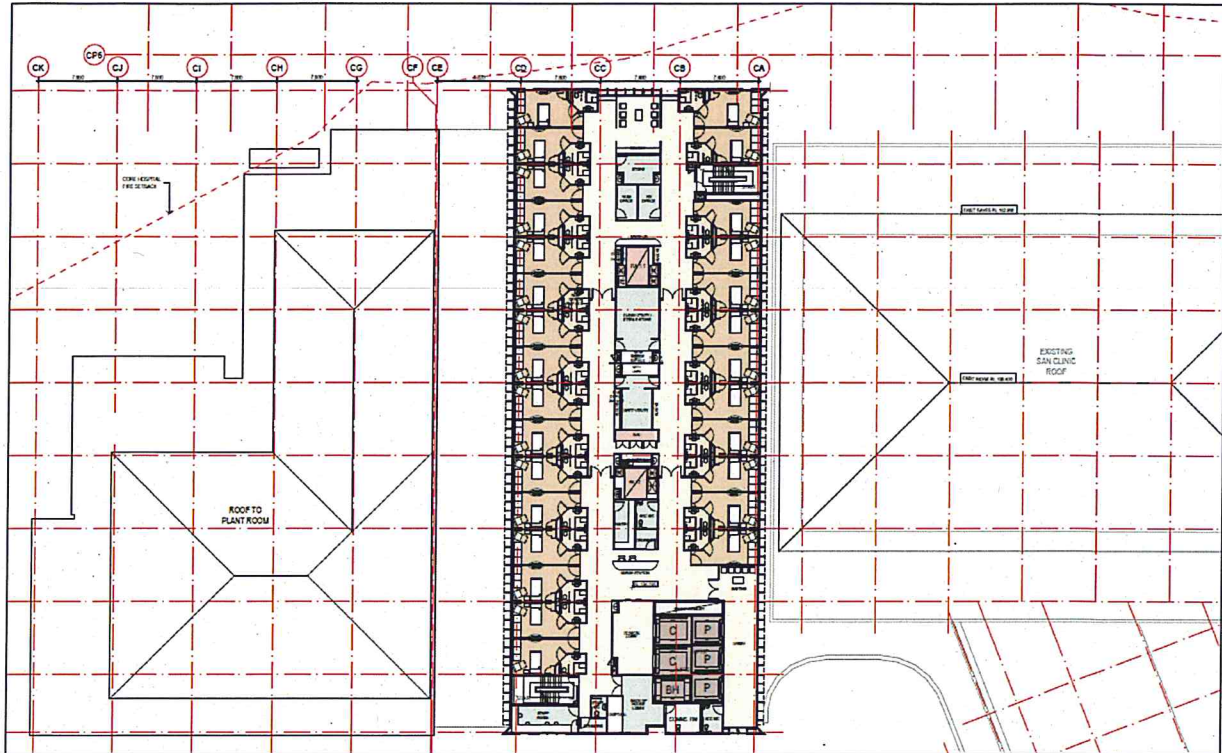


Figure 9: MOD 2 Proposed CSB Tower – Levels 7-11

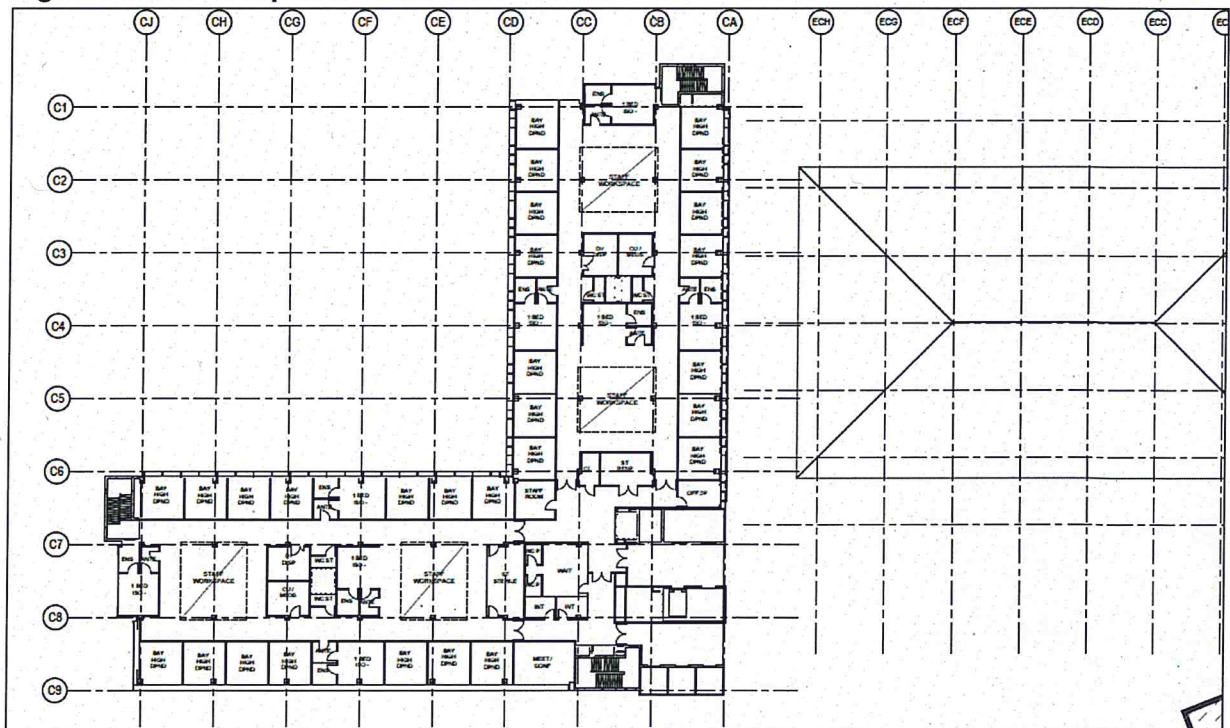


Figure 12: MP10_0070 Approved CSB – South Elevation

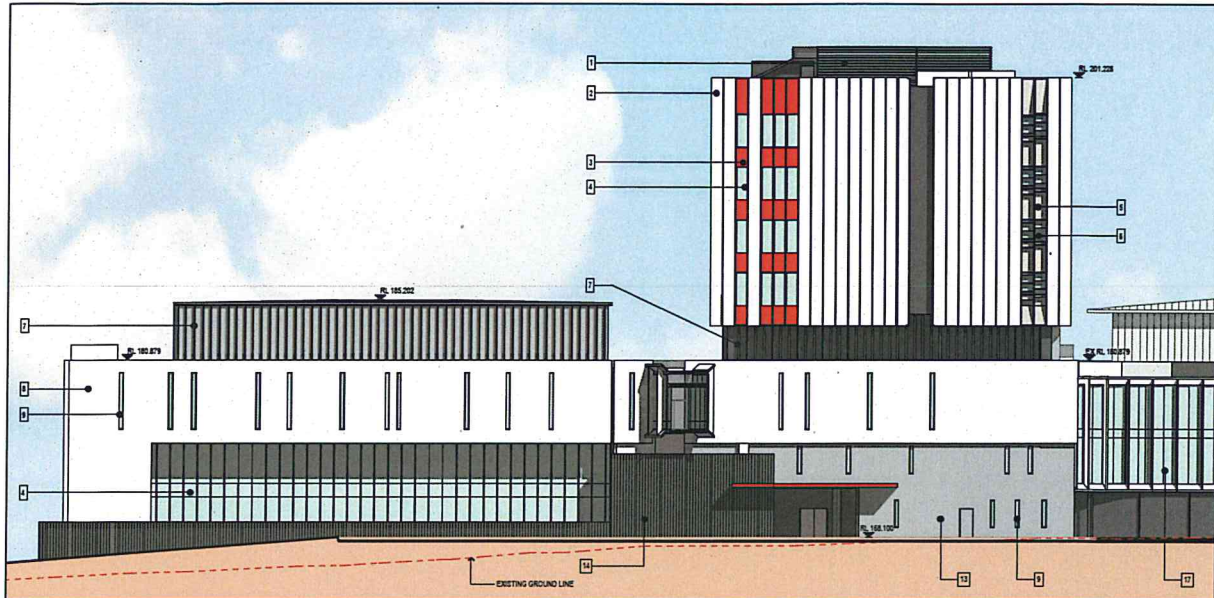


Figure 13: MOD 2 Proposed CSB – South Elevation



The proponent has advised that the proposed amendments to the built form and layout have resulted from a request from the hospital and requirements imposed by utility service providers. The amended 'L' shaped building design, requested by the hospital, is intended to assist and improve the operational characteristics of the future hospital wing. The amended design better supports the existing 10 patient per staff module, allowing for 40 beds per floor, split into two arms of 20 beds, with 10 beds on each side of each building arm and connected to the central core.

The updated service requirements for the redevelopment have required remodelling to accommodate for increased plant area. Plant areas were originally approved on Levels 6 and 11. The modification application seeks approval for plant area on all of Levels 1 and 12 and half of Level 6. The proposed plant areas are integrated into the amended building design to ensure that they form part of the overall building and not

detract from the design and to also mitigate any potential impacts generated by their operation.

Figure 14: MP10_0070 Approved CSB – South-western aerial photomontage



Figure 15: MOD 2 Proposed CSB – South-western aerial photomontage



In the context of the redevelopment of the hospital, the approved CSB expansion is the largest new building approved on the hospital site, providing 18,818 sqm of floor area, plus plant on Levels 6 and 11. The Shannon Building, by comparison, is approximately 10,000 sqm smaller. The proposed amendments to the CSB generate approximately 950 sqm of additional floor space, totalling 19,775 sqm.

The proposed amended built form reduces the bulk of the lower five floors of the extension and provides improved linkages to the western side of the hospital precinct, via a more formalised access point on Level 2 and large landscaped courtyard that would provide improved amenity for both staff and patients. It is acknowledged, however, that the proposed amended 'L' shape tower form will generate additional building bulk, specifically from the western arm of the tower.

The additional bulk generated by the amended built form is visually represented within Figures 19 to 26 in Section 5.1.2 of this report. The comparative 'approved versus proposed' photomontages demonstrate that the proposed additional building bulk will create some visual impacts within the immediate locality along The Comenarra Parkway. However, these minor visual impacts would be restricted to The Comenarra Parkway between the intersection with Browns Road and Fox Valley Road, and would be further integrated into the site's redevelopment upon construction of the approved Shannon Building adjacent. Despite the greater visual prominence of the proposed amended built form immediately adjacent to its surrounds, the visual impact generated from a district perspective is considered minor and will not detrimentally impact on the visual qualities of the skyline.

In addition, the scale and massing of the amended built form is not out of character with the approved Shannon Building and existing Clifford Building, while any direct impacts of the development's built form are largely contained within the SAH hospital site. The façade of the amended built form expresses variations in both materials and finishes which generates greater interest in the built form and is similar in character to the approved Shannon Building adjacent.

The department considers the amended 'L' shaped built form of the CSB to be satisfactory in that it provides for improved functionality and operation within the hospital. The proposal would also provide for improved linkages to the western side of the hospital precinct and offer a new formalised landscaped area that will increase patient and staff amenity. The proposed scale and finishes of the amended CSB building is in keeping with the theme of clustering larger buildings towards the centre of the SAH precinct and will not be out of character with the adjacent approved Shannon Building.

5.1.2 Height

As detailed above in Section 3.4.1 of this report, the proposed amended CSB design departs from the maximum 39.5 m building height control of clause 18(1) of Part 25 of Schedule 3 of the Major Development SEPP (see Figure 16). The proposed modification seeks approval for a predominant maximum building height of 42.8 m (RL207.0), representing a departure of approximately 3.3 m from the maximum 39.5 m height control.

The CSB development site is characterised by undulating ground levels, with the site falling approximately 4 metres towards the west and northwest, away from the centre of the SAH hospital precinct. The extent of the undulating slope influences the level of non-compliance, with the ends of the southern and western wings of the amended design displaying the greatest areas of the non-compliance. The extent of the varying non-compliance is depicted by the building elements above the red line on the western and southern building elevations (see Figures 17 and 18).

The proponent notes that the additional building height is generated by the necessity for additional plant and storage space within the building design, with the plant and services on Level 13 and fire stairs located at the northern and western ends of the building located above the maximum height.

Figure 16: SEPP Building Height Map

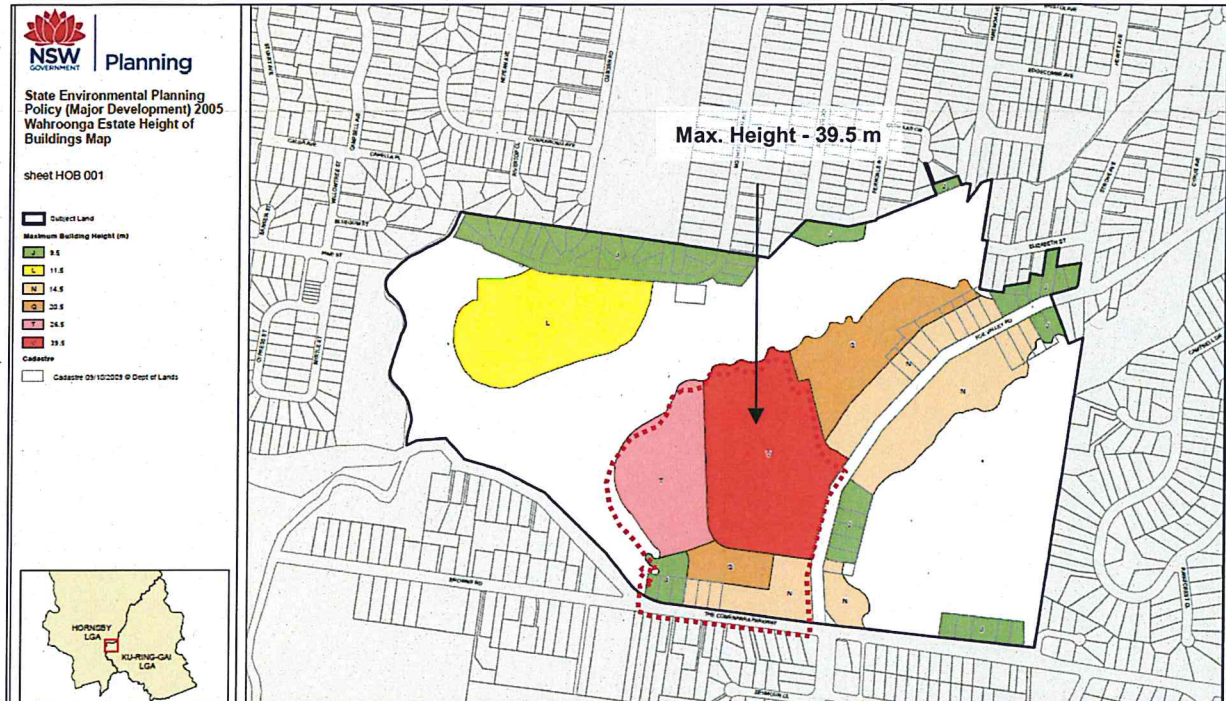


Figure 17: CSB West Elevation - Extent of non-compliance

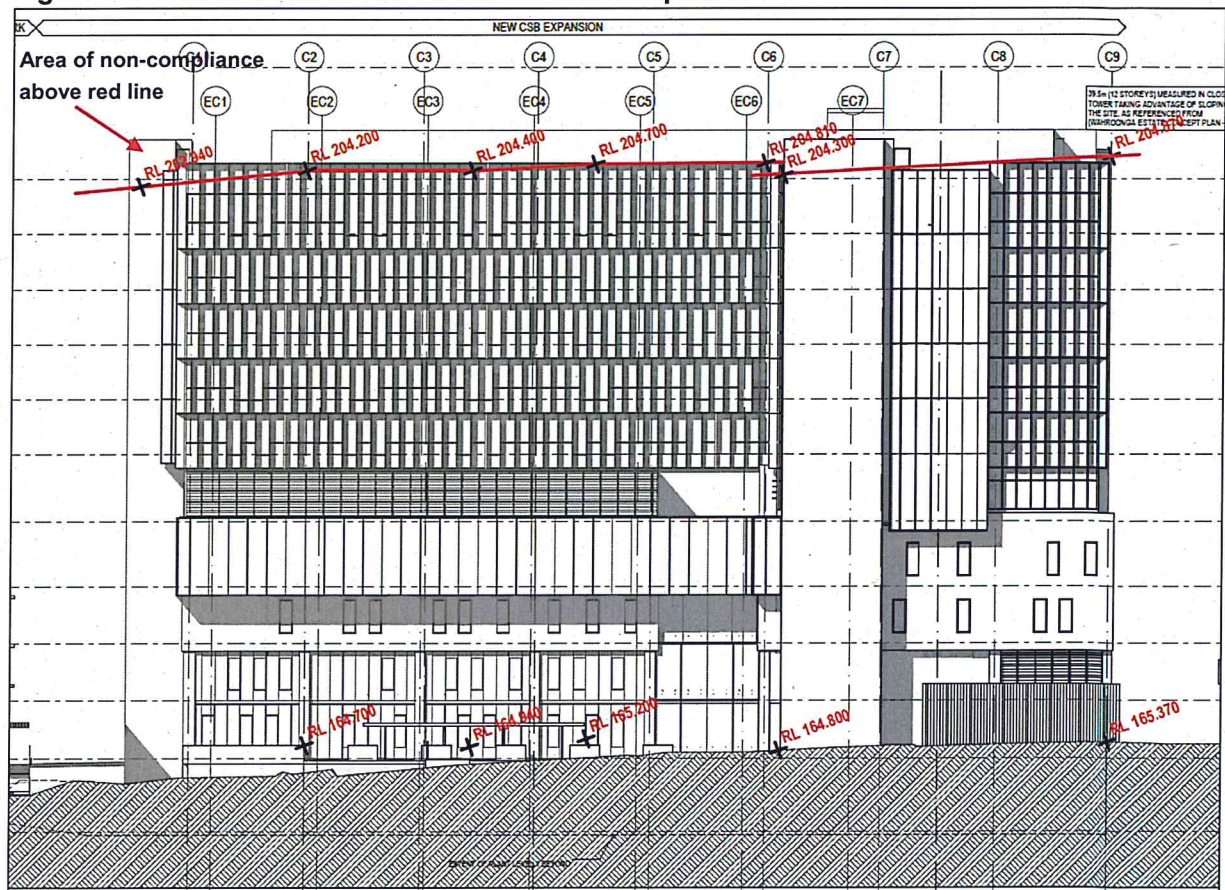
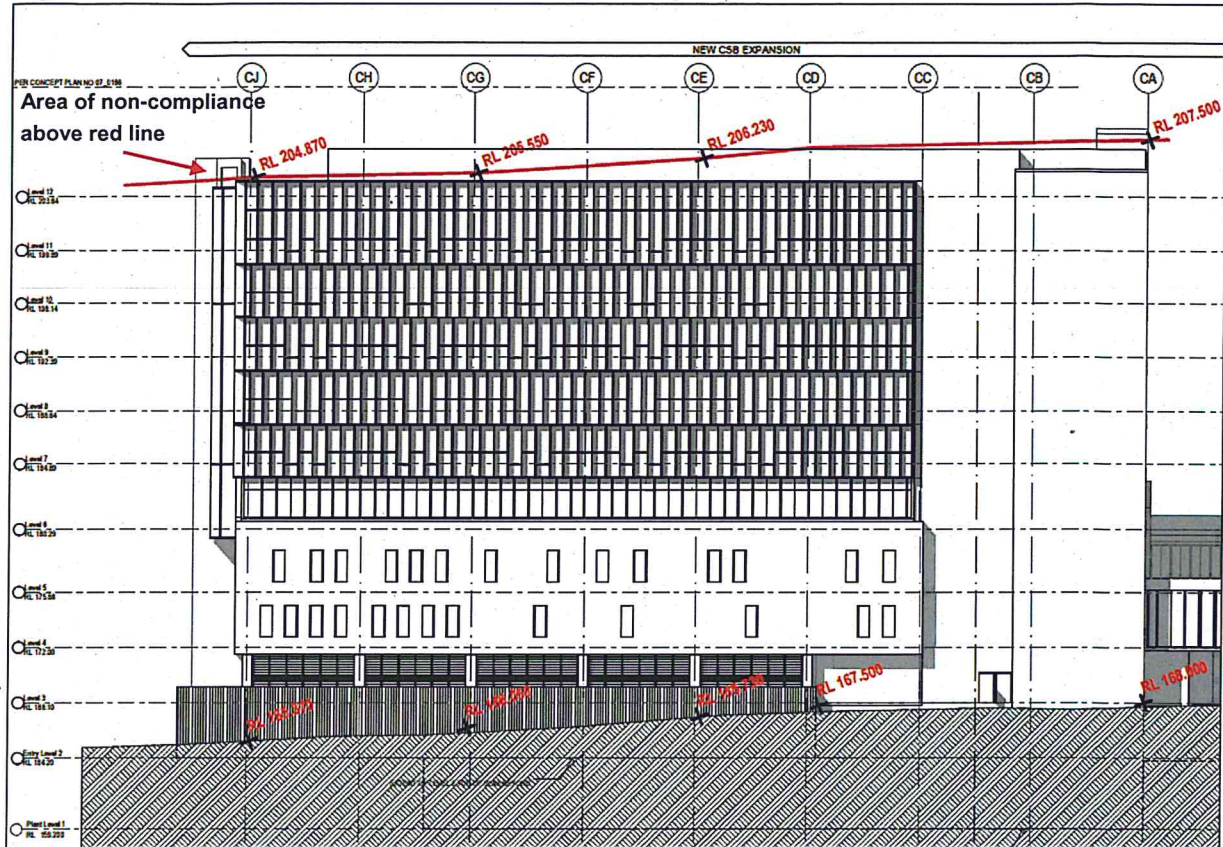


Figure 18: CSB South Elevation - Extent of non-compliance



Notwithstanding the departure of the proponent's amended design from the maximum building height control, clause 20 of Part 25 of Schedule 3 of the MD SEPP provides that a development standard imposed by any EPI does not apply if the Director-General is satisfied, and issues a certificate to the effect, that:

- (a) compliance with the development standard is unreasonable or unnecessary in the circumstances of the case, and
- (b) there are sufficient environmental planning grounds to justify exempting the development from that development standard.

In making his decision, the Director-General must consider whether any matter of significance for state or regional planning is raised, the public benefit of maintaining the development standard and any other matters required for consideration.

In seeking to rely on clause 20 of part 25 in Schedule 3 of the MD SEPP, the proponent states that the amended CSB design results in a minor exceedence of the maximum building height control and that the variation to the building height has minimal effect on the overall approved visual impact of the hospital redevelopment. Further, the proponent notes that the CSB building is located internally within the hospital precinct and is not visually intrusive in the immediate locality and is viewed predominantly from the surrounding district.

In support of this position, the proponent included an updated visual impact analysis with their modification request, detailing both the approved and proposed built forms within the hospital precinct (see Figures 19 to 26).

Figure 19: Approved North-Western Photomontage View – Canoon Road, South Turramurra



Figure 20: s75W North-Western Photomontage View – Canoon Road, South Turramurra



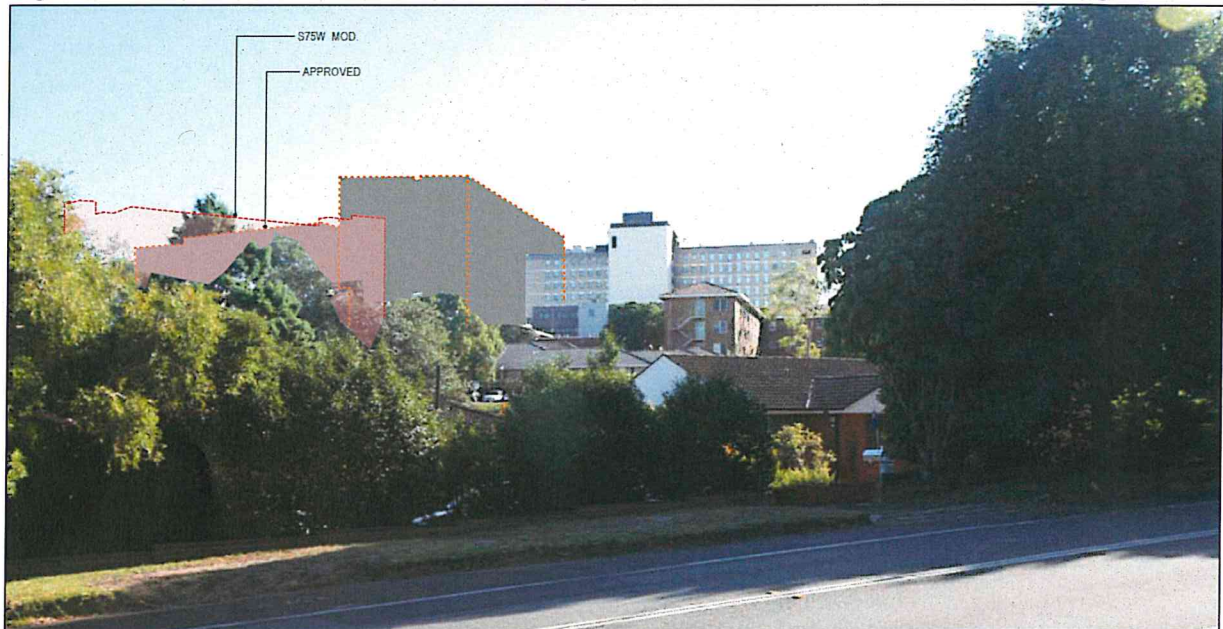
DoPI Comment

The proposed amendments to the design would have a minimal impact on the existing visual intrusion to the district landscape. The additional proposed height of the CSB building is not apparent from this position or detrimental to the surrounding built environment.

Figure 21: Approved South-Western Photomontage View – Comenarra Parkway, Wahroonga



Figure 22: s75W South-Western Photomontage View – Comenarra Parkway, Wahroonga



DoPI Comment

The visual prominence of the proposed amendments to the CSB design is most evident from The Comenarra Parkway, as depicted above. Notwithstanding this, it is the proposed amended design of the CSB rather than the proposed departure from the maximum building height control that generates the most notable change in the visual impact generated.

The siting of the CSB building within the centre of the hospital precinct and presence of the existing mature vegetation fronting The Comenarra Parkway will provide a level of visual relief and soften the immediate impact of the built form.

Figure 23: Approved Northern Photomontage View – Woods Street Reserve, North Epping



Figure 24: s75W Northern Photomontage View – Woods Street Reserve, North Epping



DoPI Comment

From a perspective approximately 2 km south of SAH, it can be seen that the proposed departure from the maximum building height has negligible impacts on existing skyline. The proposed amended built form would have greater visual impact than the additional building height, however, the building amendments generate very limited impact on the visual setting.

Figure 25: Approved South-Western Photomontage View – Leuna Avenue, Wahroonga



Figure 26: s75W South-Western Photomontage View – Leuna Avenue, Wahroonga



DoPI Comment

The prominence of the proposed amended design becomes more apparent from approximately 1 km south of SAH, but visually, the proposed departure from the maximum building height control has minimal impact on the skyline. The above view illustrates the clustering of buildings well, with the Clifford Tower building and new Shannon Building development located adjacent to the right.

In having regard to the visual impact analysis prepared, it is evident that there would be limited noticeable change to the visual impact generated by the amended CSB design and overall SAH redevelopment. The most noticeable change, visually, is present along The Comenarra Parkway, but this is largely due to the amended built form rather than the additional building height. In this regard, compliance with the maximum building height control is unnecessary in this circumstance. A reduction to the building height to comply would still present the current proposed built form and afford no greater visual outlook than the current approved CSB built form.

The proposed amended building height results in minor visual impacts to the district skyline from that which was originally approved. However, these minor impacts are largely related to the proposed amended building form, rather than the proposed height increase which itself would be difficult to distinguish between. Visual impacts generated by the proposed amended design would be greater when viewed from close proximity, but are predominantly restricted to along The Comenarra Parkway. Notwithstanding this, the amended built form will be complemented in the future by the approved Shannon Building adjacent.

The proposed departure from the maximum building height does not detrimentally impact on views or the district skyline, nor does it impact on the SAH redevelopment's compliance with the maximum gross floor area. The proposed amendments retain the building bulk of the hospital redevelopment to the centre of the hospital precinct and ensure that much of the visual impact associated with the proposal is internalised and is reduced on the surrounding built environment.

The granting of a certificate to waiver compliance with the maximum building height control will not raise any matters of state or regional planning significance nor is it likely that any further departures will occur or be necessary. The redevelopment of the SAH hospital precinct has reached its maximum development potential in terms of gross floor area, most of which has been taken up by the CSB and approved Shannon Building. In this respect, minimal scope exists for additional floor area and higher built forms, subject to future amendments. In addition, the redesigned CSB building will provide for an improved functionality and patient care, which will benefit the wider community.

In view of the above, the department considers that the proposed additional building height will not significantly impact on the redevelopment of the SAH or surrounding Wahroonga Estate and residential built environment. Further, Ku-ring-gai Council has not raised an objection to the additional height of the amended CSB design. The department considers that compliance with the development standard is unnecessary and that there are sufficient environmental planning grounds to justify the non-compliance. In this regard, it is recommended that the Deputy Director-General, in accordance with the Director-General's Instrument of Delegation, dated 23 September 2011, issues a certificate to this effect, pursuant to clause 20 of Part 25 in Schedule 3 of the MD SEPP.

5.2 Transport

The project approval conditioned road upgrade works to be undertaken relative to the stages of hospital development. Condition E1 requires the road upgrade works to be undertaken prior to the issue of an occupation certificate for the works undertaken at each respective stage as follows:

Stage 1A

- a. Initial upgrade at The Comenarra Parkway/Fox Valley Road intersection.
- b. Install 'No Parking' along Fox Valley Road in accordance with the requirements of the Ku-ring-gai Traffic Committee and Council.

Stage 2

- a. Upgrade hospital access intersection with an additional egress lane (LT 'slip lane').

Stage 3

- a. Ultimate upgrade at The Comenarra Parkway/Fox Valley Road intersection.
- b. Upgrade scheme at Pacific Highway/Fox Valley Road intersection.

The amended Stage 1 scope of works would consist of all works associated with the expansion of the CSB, multi-deck car park structure and new entry building (previously modified under MP10_0070 MOD 1) and the internal road layout and arrival podium works (approved as part of Stage 2). Stage 2 is now proposed to only comprise of works associated with the construction of the new education centre, while Stage 3, involving the redevelopment of the Shannon Building, remains unchanged.

In view of the proposed amendments to the staging of hospital works, specifically, bringing forward the internal road work upgrades and entire CSB redevelopment into the new Stage 1 scope of works, it is considered appropriate that the timing schedule for road upgrade works also be revised. In this respect, it is recommended that Condition E1 be amended to rename 'Stage 1A' to Stage 1 and that 'Stage 2' road upgrade works be integrated into the renamed Stage 1 schedule of works. 'Stage 3' is not required to be amended.

6. CONCLUSION

The modification request seeks approval to amend the built form of the Clinical Services Building (CSB), including an increase in gross floor area and building height.

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 and transport.

In assessing the key issues, the department considers that the proposed modifications to the CSB design will improve the functionality and operation of the services provided within the hospital and will not have a detrimental impact on the developing hospital precinct or surrounding built and natural environments. The recommended amendments to Condition E1 will ensure that road upgrades works are satisfactorily completed in conjunction with the redevelopment of the hospital and the proposed amended construction staging.

Prior to its referral to the Planning Assessment Commission for determination, the department recommends that the Deputy Director-General issue a certificate pursuant to clause 20, Part 25 of Schedule 3 of the MD SEPP to allow the minor 3.3 m building height non-compliance.

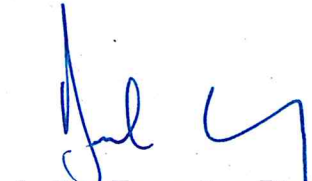
7. RECOMMENDATION

The department's recommends that the PAC:

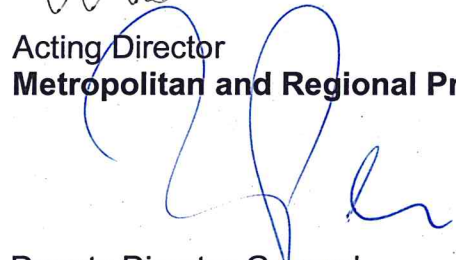
- a) **consider** the findings and recommendations of this report;
- b) **consider** the certificate issued by the Deputy Director-General pursuant to clause 20 of Part 25, Schedule 3 of the MD SEPP (Appendix C);
- c) **approve** the modifications, subject to conditions, under section 75W of the *Environmental Planning and Assessment Act, 1979*, and;
- d) **sign** the attached instrument of modification approval (Appendix D).

 5/4/12

Acting Director
Metropolitan and Regional Projects North

 5/4/12

Acting Executive Director
Major Projects Assessment

 8/4/12

Deputy Director-General
Development Assessment and
Systems Performance

APPENDIX A MODIFICATION REQUEST

Provided on disc or see the Department's website at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=4965