



NSW GOVERNMENT
Department of Planning

**MAJOR PROJECT ASSESSMENT:
Royal Rehabilitation Centre Sydney
(RRCS)
Health Facility and associated community,
open space and infrastructure works
Major Project MP 08_0054**

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

December 2008



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1 EXECUTIVE SUMMARY

This is a report on a project application for the construction of a new health facility and associated community, open space and infrastructure works on part of the Royal Rehabilitation Centre Sydney (RRCS) site, Ryde, pursuant to Part 3A of the *Environmental Planning and Assessment Act, 1979* ("the Act").

Royal Rehabilitation Centre Sydney (the proponent), is seeking approval for the demolition of existing RRCS buildings on part of the RRCS site, and construction of the following:

- Health Facility Main Building;
- New Weemala high care residential facility;
- Pharmacy/general store building;
- Recreation Circle comprising child care and community centre building, multi use courts;
- Open space comprising Central Parklands and Wetlands;
- Landscaping; and
- Internal roads and car parking for a total of 304 cars.

The estimated project cost of the development is \$68.855 million.

The proposal will create approximately 150 full time equivalent construction jobs and 650 full time equivalent operational jobs.

The proposal was exhibited from 21 May 2008 for 31 days until 20 June 2008 and was published in the Northern District Times and the Sydney Morning Herald. The Environmental Assessment was made available to the public in the Department's Information Centre, and Ryde Council Civic Centre. During the exhibition period, the Department received 4 submissions from public authorities and 4 submissions from the public.

Key Issues

Key issues raised by both public agencies and the public relate to consistency with the Concept Plan approval (especially height of Weemala and Pharmacy buildings), future of Weemala residents, land to be transferred to Council, drainage, traffic and access.

Preferred Project Report

On 25 September 2008, the applicant amended the application via the Preferred Project Report to address issues raised by the Department and submissions. The report provided:

- Amended design and additional details for the pharmacy building;
- Additional details of the drainage details for the site;
- Clarification of ESD measures to be implemented;
- Amendments to access and parking within the site;
- Revised Statement of Commitments.

Assessment

The Department has assessed the merits of the proposal and is satisfied that the impacts of the proposed development have been addressed via the proponent's Preferred Project Report, the Statement of Commitments and the Department's recommended conditions relating to staging of the Health Facility, future of Weemala residents, future approvals, and works to be dedicated to Council. Furthermore, the proposal adequately addresses the Director General Requirements for the project and is generally consistent with the approved Concept Plan. On these grounds, the Department is satisfied that the site is suitable for the proposed development and that the project will provide environmental, social and economic benefits to the region. All statutory requirements have been met.

2 BACKGROUND

2.1 SITE CONTEXT AND LOCATION

The RRCS site is located at 600 – 640 Victoria Road and 55 Charles Street, Ryde and is known as Lot 1010 in DP 836975. The site is owned by RRCS and is within the local government area of Ryde. Refer to Figure 1.



Figure 1 – The RRCS site

The proposed development is located on part of the RRCS site and has an area of 6.475 hectares. Refer to Figure 2 below:



Figure 2. Existing facilities on the RRCS site, and site of the proposed works (shaded red)

2.2 EXISTING SITE AND LAND USE

RRCS is a not for profit health organisation and operates as an independent public hospital. It provides rehabilitation programs for adults with acquired disabilities, neurological illness, spinal cord injury, traumatic brain injury and age related illness and disease. The proponent currently operates its specialist rehabilitation and aged care services from three precincts within the site, namely Coorabel, Weemala and Moorong.

The site contains internal access roads and car parking areas, including 2 access points from Morrison Road and a single access point from Charles Street, providing access to the Coorabel centre.

The site slopes down to the centre of the site to the proposed Central Parkland, and to Charles Street.

2.3 SURROUNDING LAND USES

Land uses surrounding the site comprise of a mixture of residential and retail. The site is predominantly surrounded by low to medium density residential development of up to two storeys. Calvary Retirement Community is located to the northwest, at the intersection of Victoria Road and Princes Street, and includes a range of one to four storey buildings.

Putney shopping village is located at the intersection of Charles Street and Morrison Road near the site's Morrison Road access point. Existing retail uses are of a small scale and therefore functions as a local neighbourhood centre. Other commercial uses lie on the opposite side of Victoria Road. The site is considered to be well served by public transport given its location adjacent to Victoria Road and in close proximity to Ryde bus depot and two local train stations.

2.4 APPROVAL HISTORY

2.4.1 RRCS Concept Plan

On 23 March 2006, the Minister for Planning approved a Concept Plan for the redevelopment of the Royal Rehabilitation Centre Sydney (MP 05_0001). The Concept Plan was approved to facilitate the development of:

- A new, purpose built specialised rehabilitation and disability facility;
- No more than 50 residential dwellings per hectare on land excluding the new, purpose built specialised rehabilitation and disability facility;
- Landscaped public and private open space;
- Associated services and infrastructure; and
- Land use distribution, building heights, densities, dwelling mixes and types.

A copy of the Concept Plan approval is located at **Appendix E**. The most significant issues in the approval that relate to the current application are:

- Provision of a new multifunctional Health and Disability Centre, and a range of accommodation facilities;
- Provision of recreation facilities, child care centre and community meeting room;
- Planning agreements or developer contributions with Council for works including community and educational facilities, public open space, traffic calming measures and relocation of Riding for the Disabled (RDA) Ryde;
- Commitment to a staged development of the site to ensure rehabilitation and disability services will continue to be provided throughout the development period;
- Submission of additional reports to address development issues on the site including as contamination, heritage, landscaping and traffic.

2.4.2 Subdivision

On 12 August 2008, the Minister for Planning approved a project application to subdivide the site into 7 Torrens title superlots. The development subject to this application will be located within Lots 5 and 6 of the approved subdivision plan.

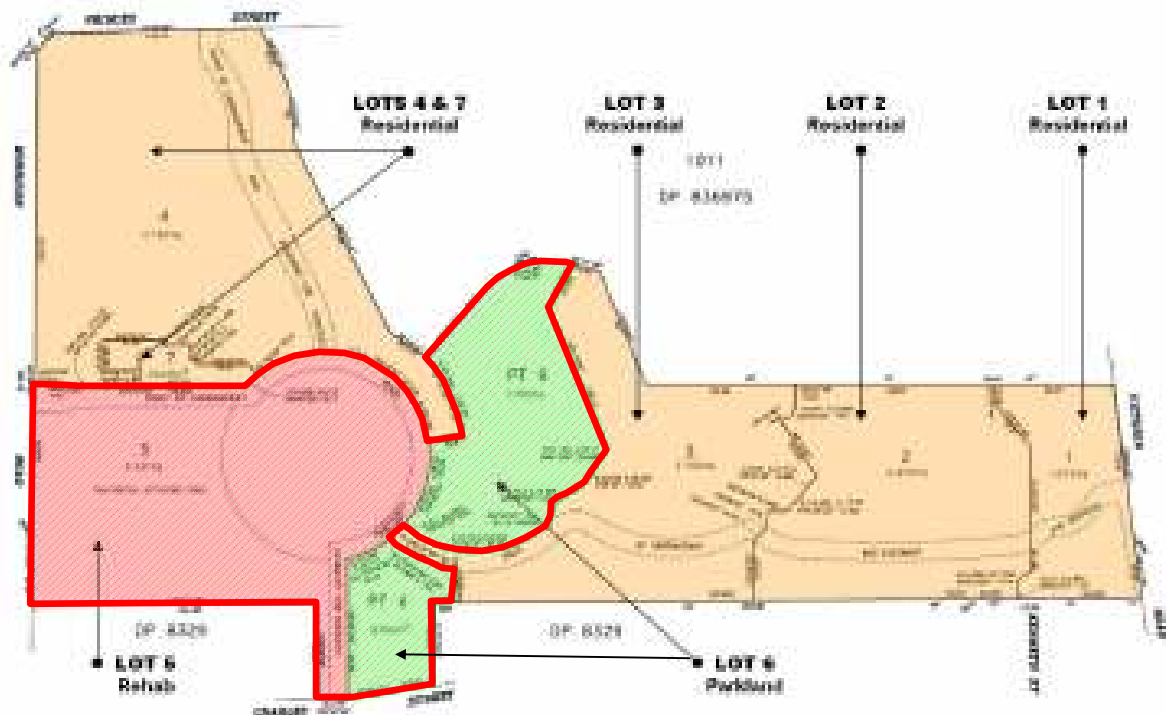


Figure 3. Approved plan of subdivision for the RRCS (Lots subject to this application within red boundary).

3 PROPOSED DEVELOPMENT

3.1 PROJECT APPLICATION

The proponent seeks project approval for the demolition of existing "Coorabel" hospital facility on part of the RRCS site and construction of the following:

- Health Facility Main Building containing rehabilitation facilities, and professional suites and 60 ward beds;
- New Weemala high care residential facility accommodating 32 residents;
- Pharmacy/general store building;
- Recreation Circle comprising child care and community centre building, and multi use courts;
- Open space comprising Central Parklands and Wetlands;
- Landscaping; and
- Internal roads and car parking for a total of 304 cars.

A summary of numerical compliance with the approved Concept Plan and Major Projects SEPP is provided in Table 1 below. A detailed description of each component of the development is provided in Section 3.2 of this report, and an assessment of the key issues is provided in Section 5 of this report.

Table 1 – Development Summary

	Concept Plan/MP SEPP	Proposed	Compliance
Site Area	-	6.475 hectares	N/A
Central Parkland	24,094m ²	23,384m ²	No*
Gross Floor Area			
Health Facility, Weemala & Pharmacy	25,000m ² (combined)	15,940m ² (combined)	Yes*
Community centre	3,056m ²	540m ²	Yes*
FSR			
Health Facility, Weemala & Pharmacy (Area "F" on SEPP Map)	1.2:1	0.67:1	Yes
Community centre	N/A	N/A	N/A
Height			
Health Facility	5 levels, max RL 51	3 levels, RL 43.55	Yes
Weemala	2 levels, max RL 29	2 levels, RL 31.7	No*
Pharmacy	2 levels, max RL 36	2 levels, RL 38.8	No*
Community Centre	2 levels, max RL 32	1 levels, RL 29.29	Yes
Setbacks			
Morrison Rd	6m	Min. 6m	Yes
Southern Boundary	3m	Min. 3m	Yes
Road 1	3m	4.785m	Yes
Road 2 (Rec. Circle)	6m	24m	Yes

* These issues are discussed in Section 5 of this report.

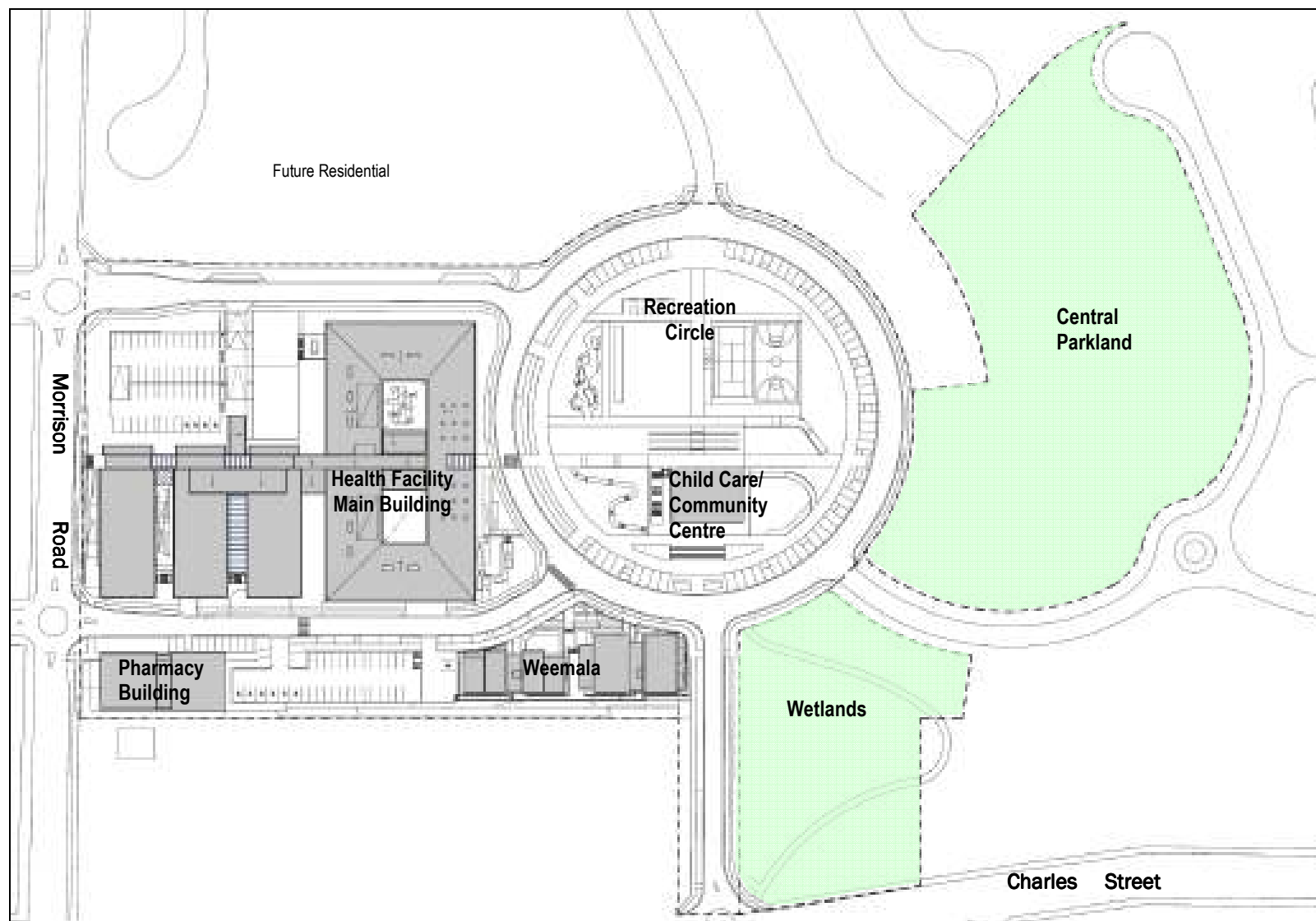


Figure 4. Site of the proposed development (Refer to Figure 5 for detail of Central Parkland and Wetlands)



Figure 5. Detail of Central Parkland and Wetlands



Figure 6 Level 1 floor plan of the Health Facility Main Building, showing the professional suites (blue) and rehabilitation (orange) sections of the building.



Figure 7. South Eastern corner of the proposed Health Facility Main Building as seen from within the site.



Figure 8. Front view of new Weemala.

3.2 DETAILED DEVELOPMENT DESCRIPTION

3.2.1 Health Facility Main Building

The Health Facility Main Building has a gross floor area (GFA) of 12,830m² over four levels and includes the following facilities:

Lower ground floor/ Basement:	Administration, food preparation and other ancillary facilities Car parking for 124 spaces Loading bay
Ground Floor:	Hydro pool, gyms, therapy and treatment rooms Dining rooms, conference rooms, library and administration suites John Walsh research institute Professional suites Car parking for 35 vehicles
First Floor:	Neurology ward, spinal ward, and ancillary facilities Administration suites and university polyclinic
Second Floor:	Professional suites

The professional and administration wings of the buildings (coloured blue in Figure 6) are located closest to Morrison Road, and the ward and rehabilitation wings (coloured orange in Figure 6) are located closest to the Recreation Circle.

The Health Facility is proposed as a modern, world class health facility providing 60 ward beds, with additional facilities to treat approximately 120 inpatients on any given day. This is a decrease of 16 beds compared to the existing facility, however the number of outpatients is expected to triple due to the increased provision of community and home based programs in addition to inpatient services.

The proposed floor plate has been designed to provide high levels of interconnectivity between the different operations in the building, and provide flexibility to allow for changes to configuration and use of parts of the building if necessary in the future. The at-grade parking area adjoining the building has been designed to also serve as a potential expansion area for the building, subject to future patient demand and funding arrangements, while still allowing compliance with the maximum GFA in the Concept Plan for this use.

The building has been designed with internal courtyards and extensive window frontage to increase natural light and improve the outlook for patients and staff. ESD measures include use of natural light, ventilation and insulation. Materials include face brickwork, and timber cladding and will be consistent with the other buildings proposed for the site in the application.

Demolition of the existing Coorabel facility and construction of the new Health Facility will be staged, with various wings of both buildings to be demolished and constructed in a way to ensure the RRCS is able to continue operating during the course of construction.

3.2.2 Weemala facility

The new Weemala has a GFA of 1,940m² and consists of 2 buildings, each 2 storeys in height. The proposed facility is to provide modern, high care residential accommodation for 32 residents (compared to 5 transitional and 30 long term residents at the existing Weemala). This new facility will replace the existing Weemala high care residential facility on the RRCS site which is over 100 years old and not up to current accessibility standards. Existing residents are to be relocated to either the new Weemala facility or alternative off site accommodation if agreed to by residents, their carers and relevant government agencies. The new facility has also been designed to provide significantly improved access to the Health Facility Main Building and other facilities on the RRCS site.

3.2.3 Pharmacy/General Store building

The Pharmacy building is 2 storeys in height and contains 4 separate units, and has a GFA of approximately 1100m². It is proposed to contain uses that are ancillary to the Health Facility, including a pharmacy. Additional plans were provided in the PPR detailing the elevations and materials.

3.2.4 Recreation Circle

The Recreation Circle has an area of 2.17 hectares and will include community centre, child care centre, 2 multipurpose courts, soft landscaping, and 54 car parking spaces.

The facilities on the Recreation Circle will be under the ownership of, and managed by RRCS although is subject to a Deed of Agreement with Council. The community and recreational facilities will be for the use of RRCS staff and patients, with provision for the use of the facilities by the general public, including 40 child care spaces available to the public. The perimeter road will be dedicated to Council, along with all the other internal roads.

3.2.5 Central Parkland and Wetlands

The Central Parklands and Wetlands has a combined area of 23,384m² and is proposed to function as both a stormwater detention basin and public open space that will be available to the general public. It will contain a number of facilities including pathways, access for disabled persons, central pond, viewing deck and children's playground. The Central Parkland and Wetlands is to be dedicated to Council, as part of the Deed of Agreement with Council.

3.2 PROJECT CHRONOLOGY

- On 23 March 2006, the Minister for Planning approved the Concept Plan for the RRCS. The approval included a number of conditions to be satisfied prior to lodgement of additional applications. Three of the conditions, relating to traffic, planning agreements and public domain management, were not satisfied until April 2008.
- On 12 August 2008, the Minister for Planning approved the subdivision of the site into 7 superlots.
- On 12 November 2007, the project application for the Health Facility was lodged with the Department.
- The project was publicly exhibited from 21 May 2008 until 20 June 2008 for a period of 31 days.
- On 25 July 2008, copies of the agency submissions, and a summary of the public submissions was sent to the proponent.
- On 25 September 2008, the proponent lodged the Preferred Project Report.

3.3 PREFERRED PROJECT REPORT

On 25 September 2008, the proponent submitted a report titled Supplementary Report, hereafter referred to as the Preferred Project Report (PPR).

The PPR included amended details and report, which can be summarised as follows:

- Improved pedestrian/accessible paths throughout the site;
- Amended plans and additional design details for the proposed pharmacy/general store building including elevations, sections and shadow diagrams and alignment to Morrison Road frontage;
- Archaeological report amended to correct error of ownership details;
- Clarification of drainage details to address Council's issues;
- Revision to the Draft Statement of commitments including:
 - Improved traffic and pedestrian safety including around the Recreation Circle;
 - Management of the meeting room lift and toilets;
 - Commitments to ESD measures to be implemented;
 - Heritage implementation strategy to be presented to Council and Department for comment;
 - Further liaison with Council for design of Community Centre and Child care centre, roads and drainage

- Encouragement of non-car travel.

The PPR was not formally exhibited, however has been placed on the Department's website.

4 STATUTORY CONTEXT

4.1 MAJOR PROJECT DECLARATION

The proposal is a Major Project under Part 3A of the Act as it meets the criteria in Schedule 3, Part 3, Clause 5(1) of *State Environmental Planning Policy (Major Projects) 2005* as the project is on the RRCS site and has a capital investment value of \$5 million. On 8 May 2008 the proposal was declared a Major Project.

The Capital Investment Value of the development is approximately \$65 million.

4.2 ZONING/PERMISSIBILITY

The site is listed under Schedule 3 of the Major Projects SEPP, and comprises the following zones:

- a) General Residential Zone
- b) Public Recreation Zone
- c) Special Activities (Royal Rehabilitation Centre Sydney) Zone

The Health Facility main building, pharmacy building and new Weemala facility are located within the Special Activities zone, and are permissible in the zone.

The community facility building, child care centres, recreation areas are permissible in the Public Recreation zone.

4.3 DIRECTOR GENERAL'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

On 8 May 2008, the Director General issued environmental assessment requirements (DGRs) pursuant to Section 75F of the EP & A Act. The key issues to be addressed in the DGRs issued related to:

- Compliance with Concept Plan approval
- Urban form and design
- Amenity impacts
- Traffic, parking and access
- Contamination
- Construction and operational impacts
- Stormwater drainage and flooding
- Waste management
- Open space
- Services

These issues were adequately addressed in the proponents EA and subsequent documentation to enable a thorough assessment of the proposal and identification of appropriate mitigation measures through recommended conditions of approval.

4.4 OBJECTS OF THE ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

The objects of any statute provide an overarching framework that informs the purpose and intent of the legislation and gives guidance to its operation. The Minister's consideration and determination of a project application under Part 3A must be informed by the relevant provisions of the Act, consistent with the backdrops of the objects of the Act.

The objects of the Act in section 5 are as follows:

(a) to encourage:

- (i) the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment,
 - (ii) the promotion and co-ordination of the orderly and economic use and development of land,
 - (iii) the protection, provision and co-ordination of communication and utility services,
 - (iv) the provision of land for public purposes,
 - (v) the provision and co-ordination of community services and facilities, and
 - (vi) the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats, and
 - (vii) ecologically sustainable development, and
 - (viii) the provision and maintenance of affordable housing, and
- (b) to promote the sharing of the responsibility for environmental planning between the different levels of government in the State, and
- (c) to provide increased opportunity for public involvement and participation in environmental planning and assessment.

Of particular relevance to the assessment of the subject application is consideration of the Objects under section 5(a). Relevantly, the Objects stipulated under section 5(i) (ii), (iv) (v),(vi) and (vii) are significant factors informing the determination of the application. The project does not raise significant issues with regards to (iii), and (viii).

With respect to ESD, the Act adopts the definition in the *Protection of the Environment Administration Act 1991* including the precautionary principle, the principle of inter-generational equity, the principle of conservation of biological diversity and ecological integrity, and the principle of improved valuation, pricing and incentive mechanisms.

The Department has considered the Objects of the Act, including the encouragement of ESD in the assessment of the project application.

4.5 ECOLOGICALLY SUSTAINABLE DEVELOPMENT (ESD) PRINCIPLES

There are five accepted ESD principles:

- (a) decision-making processes should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations (the integration principle);
- (b) if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation (the precautionary principle);
- (c) the principle of inter-generational equity - that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations (the inter-generational principle);
- (d) the conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making (the biodiversity principle); and
- (e) improved valuation, pricing and incentive mechanisms should be promoted (the valuation principle).

The Department has considered the proposed development in relation to the ESD principles and has made the following conclusions:

1. Integration Principle - The proposed development will be generally consistent with the approved Concept Plan, providing vital rehabilitation and care facilities, whilst also providing a number of community facilities and recreational areas that will either be dedicated to the Council or provisions made for use by the public.

2. Precautionary Principle – Issues of threatened or vulnerable species, populations, communities or significant habitats were addressed at Concept Plan stage, with the site identified as having low level of environmental sensitivity. Issues of potential flooding on the site were also addressed under the Concept Plan approval, including the creation of the Central Parklands to incorporate drainage works.

3. Inter-Generational Principle – The redevelopment of the site will result in upgraded rehabilitation facilities and high care accommodation, additional community facilities, open space and improved landscaping on the site, with a number of facilities available to the general public.

4. Climate Change - The proposed development is not likely to be impacted by potential rises in river or sea levels due to the height of the site above sea level (at least RL 18). The Central Parkland area is affected by the 1 in 100 year flood, however management of drainage on the site is considered to adequately address stormwater and drainage of the site. Vegetation removal and planting is not considered to have a significant impact on climate change.

5. Biodiversity Principle – Issues of ecology and biodiversity were addressed in the approved Concept Plan. There is little natural vegetation on the site and the site does not contain any threatened or vulnerable species, populations, communities or significant habitats. The proposal will result in improved landscaping and vegetation cover that will contribute to improved conservation of biological diversity or ecological integrity.

6. Valuation Principle – The development will result in modern, high quality health facilities, including high care residential care facility, and community and open space works.

The proponent is committed to ESD principles and has reinforced this through the Statement of Commitments and the Environmental Assessment which explores key ESD opportunities, including mechanical, electrical and hydraulic systems as well as architectural designs to ensure high environmental performance is delivered.

4.6 SECTION 75I OF THE ACT

Section 75I(2) of the Act provides that the Director-General's report to the Minister is to address a number of requirements. These matters and the Department's response are set out as follows:

Section 75I(2) criteria	Response
Copy of the proponent's environmental assessment and any preferred project report; and	The Proponent's EA and Preferred Project Report are located on the assessment file.
Any advice provided by public authorities on the project; and	Submissions provided by public authorities on the project for the Minister's consideration is set out in Section 6 of this report.
Copy of any report of a panel constituted under Section 75G in respect of the project; and	No statutory independent hearing and assessment panel was undertaken in respect of this project.
Copy of or reference to the provisions of any State Environmental Planning Policy that substantially govern the carrying out of the project; and	Each relevant SEPP that substantially govern the carrying out of the project is identified in Appendix D, including a brief assessment of the impact of the SEPP on the development proposal.
Except in the case of a critical infrastructure project – a copy of or reference to the provisions of any environmental planning instrument that would (but for this Part) substantially govern the carrying out of the project and that have been taken into consideration in the environmental assessment of the project under this Division, and	An assessment of the development relative to the prevailing environmental planning instrument is provided in Sections 4 and 5 of this report
Any environmental assessment undertaken by the Director General or other matter the Director General considers appropriate; and	The environmental assessment of the project application is this report in its entirety.

A statement relating to compliance with the environmental assessment requirements under this Division with respect to the project.	The proponent's EA addressed the DGR requirements and the EA is considered to have satisfied those requirements as addressed in this report. Refer to the Conclusion in Section 7 of this report for a statement relating to this requirement.
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Clause 8B of the Regulation sets out the matters which the Director General must present in his report for environmental assessment and Ministerial consideration. It states that the Director General's report is to include an assessment of the environmental impact of the project, any aspect of the public interest that the Director General considers relevant to the project, the suitability of the site for the project and copies of public submissions received by the Director General. These issues are discussed in this report.

4.7 ENVIRONMENTAL PLANNING INSTRUMENTS (EPIS)

Appendix D sets out the relevant consideration of legislation (including other Acts) and environmental planning instruments as required under Part 3A of the Act. They include the following:

- State Environmental Planning Policy (Infrastructure) 2007;
- State Environmental Planning Policy No. 55 (Remediation of Land) (SEPP 55).

5 ASSESSMENT OF ENVIRONMENTAL IMPACTS

Key issues considered in the Department's assessment of the Environmental Assessment include:

- Compliance with the approved RRCS Concept Plan;
- Terms of the Concept Plan;
- Relocation of Weemala residents;
- Childcare centre;
- Traffic;
- Drainage;
- Disabled access;
- Heritage;
- Public Interest.

5.1 RRCS CONCEPT PLAN APPROVAL

There are some minor inconsistencies between the approved Concept Plan and the submitted project plan, relating to the Central Parkland area, height of Weemala and Pharmacy buildings, floor area of proposed buildings, and parking and access.

Central Parkland

The proposed Central Parkland is 23,384m², a reduction of 710m² from the approved Concept Plan. This is solely due to the exclusion of No. 53 Charles Street which was incorrectly included as part of the site under the Concept Plan application, and corrected in the approved subdivision plan of the RRCS site approved on 12 August 2008. The reduced area has been agreed to by Council, and still meets all the commitments contained in the Deed of Agreement with Council, as detailed in their submission to the proposal.

Height of Weemala and Pharmacy buildings

Both the Weemala and the Pharmacy buildings comply with the 2 storey height limit and floor space ratio controls under Clause 11, Part 3, Schedule 3 of the MP SEPP. The buildings also comply with the maximum storey height in the Concept Plan approval (which is consistent with the controls in the MP SEPP), however both buildings exceed the maximum RL heights as approved in the Concept Plan.

The Weemala facility exceeds the maximum height by 2.7m. The additional height has been justified by the slope of the site and the need to provide internal configurations and access to the buildings and other facilities on the site that meet the needs of the future residents. The proponent has sought to reduce the impact of the additional height by increasing the setback from the adjoining residential properties from 3m to 8.17m, thereby minimising the potential for overlooking and overshadowing of these properties. The retention of large trees along the boundary with the residential properties will also achieve high levels of amenity both for Weemala residents and the adjoining residents.

The Pharmacy exceeds the maximum height by 2.8m. This is also due to the existing ground line and slope and need to maintain adequate access paths for those using the health facility. The ground level and roof RLs in the Concept Plan only provide for a 3.5m high building, which is an inadequate height for a 2 storey building. The amenity impacts for the adjoining property are not considered to be significant, especially as it is a commercial property, not residential. The PPR amended the footprint of the building to address Council's request for the building to maintain the alignment of shops in Morrison Road, whilst still being consistent with the Concept Plan approval.

Gross Floor Area (GFA) of Health Facility and Recreational Circle facilities

The building footprint and design of the Health Facility Main Building differs to the indicative plan in the Concept Plan approval, although complies with all numerical requirements. The Concept Plan did not provide a GFA specifically for the Health Facility Main Building, only an overall maximum GFA for the combined health facility, new Weemala and Pharmacy buildings. The proponent states that the proposed Main Building has been

designed by the architects based on extensive research into the world's leading rehabilitation centres, along with extensive consultation with user groups at the existing facility.

Table 2 provides a comparison between the Health Facility as proposed in the Concept Plan and current application:

Table 2 – Comparison of health facility proposals in Concept Plan and Project Application

	Concept Plan proposal	Project Application proposal
CIV	\$40 million	\$45 million
Beds	Up to 64	60
Jobs	600	650

Most of the facilities proposed in the Concept Plan proposal have been provided in the current application, including residential rooms with ensuites, conference and educational facilities, medical consulting rooms, library, cafeteria, Wheelchair Sports Association and Technical Aid for the Disabled. The proposed health facility has a more efficient and integrated design compared to the modular design with distinct building components, as detailed in the indicative design in the Concept Plan application.

The floor area of buildings provided in the Recreation Circle (community centre and child care centre building) is less than that approved in the Concept Plan. The swimming pool and gym proposed in the Concept Plan are not included in this application. These facilities are not considered to be essential, especially as the Ryde Aquatic Leisure Centre is located approximately 500m east of the site on Victoria Road. In addition, Council stated in its response to the exhibition of the EA that all commitments in the Deed of Agreement for provision of community facilities has been met. In addition, nothing in the application precludes future expansion of the facilities.

Parking and access

Minor changes have been made to visitor car parking design and pedestrian pathways through the site to improve access arrangements. Changes to the design of parking around the Recreation Circle have also been committed to in order to improve safety.

It is considered that the proposal is generally consistent with the approved Concept Plan and the discrepancies are not significant. In relation to Weemala, the increased boundary setback is a significant improvement to design and amenity for adjoining residential properties.

5.2 TERMS OF THE CONCEPT PLAN

The Concept Plan approval is attached at **Appendix E**. Conditions that are relevant to the Health Facility application are discussed below:

- Condition C1. Health and Community Facilities

The condition has 5 parts, as summarised below:

- Provide a new multi-function Health and Disability Centre
- Provide a range of accommodation choices for people with disabilities
- Provide recreation facilities, a child care centre and community meeting room, available for clients of RRCS health facilities and the general public
- Negotiate a planning agreement to provide community facilities and infrastructure
- Commit to a staged development to enable rehabilitation and disability services to continue during construction.

Each of the above criteria have been satisfactorily addressed in the application, however conditions are recommended to ensure the staging plan is finalised prior to issue of a Construction Certificate.

- Condition B5. Planning Agreements

A copy of the Deed of Agreement, signed by RRCS and Ryde City Council is provided at Appendix D of the EA. The agreement covers the following:

- Community and educational facilities
- Open space
- Traffic calming measures
- Provision of infrastructure.

The submission to the EA from Ryde City Council dated 14 July 2008, states that all commitments contained in the Deed of Agreement with Council are met. However Council did state that further consultation between the proponent and Council staff is recommended in finalising the design of facilities such as the childcare centre, roads, drainage and landscaping. This issue has been previously in the Deed, or addressed through either the revised Statement of commitments, or in the recommended conditions for further approvals from Council.

Arrangements for the relocation of Riding for the Disabled (RDA) Ryde were resolved prior to approval of the subdivision of the site. *State Environmental Planning Policy (Infrastructure) 2007* was amended on 17 October 2008 to enable RDA to move to Marsfield Park. A legal agreement regarding funding for relocation has been made, which was facilitated by the Department of Planning.

- Condition C13. Staging of Development

Condition C13 of the Concept Plan approval required a staging plan to be prepared to ensure ongoing care available while the new facility is being constructed.

The proponent provided 2 options for the staging strategy for the Health Facility. Both enable concurrent demolition and construction of the new facility, including temporarily relocating staff off site or in temporary facilities. Both staging options are similar and are considered to be satisfactory, however a condition is recommended for the final staging strategy to be finalised prior to issue of a Construction Certificate. The staging of Weemala is discussed in section 5.3 below.

In addition, in the proponents Statement of Commitments, point No. 2 states *"the development will be staged to enable the RRCS to continue to provide a fully functioning rehabilitation and disability service, throughout the development period"*.

- Planning reports

The Concept Plan approval required a number of reports to be provided. These reports were also required under the DGRs. They included the following:

- Contamination
- Heritage
- Archaeological
- Geotechnical
- Landscaping
- Utilities
- Traffic and Transport
- Stormwater Management
- Construction Management

Each report has been provided and considered to be satisfactory, subject to relevant conditions to mitigate the impacts of the development.

5.3 RELOCATION OF WEEMALA RESIDENTS

The new Weemala high care facility is to replace the existing Weemala facility on the RRCS site. The existing facility is located on Lot 4 in the approved subdivision plan and has been zoned for residential development under Schedule 3 of the Major Projects SEPP. The demolition is to be considered in a future application for the redevelopment of this lot.

To ensure ongoing care of Weemala residents, Condition E7 of the subdivision approval was included which required a restriction on the use of the land to require the existing Weemala to continue to operate until all existing residents are relocated to either the new Weemala or alternative off-site accommodation as agreed to by residents, carers and relevant government agencies.

Point No. 7 of the proponent's Statement of Commitments for this application states the existing Weemala residents will have the choice of transition to other appropriate accommodation or remain on the site within the new Weemala. A condition of approval has also been recommended to ensure that residents will remain on site or moved to alternatives as agreed to be residents, carers and relevant government agencies.

5.4 CHILDCARE CENTRE

The proponent is only seeking approval for the child care centre building in this application. A future application for the use and fit out of the centre is to be lodged with and determined by Council, as detailed in the proponent's Statement of Commitments, and supported with a recommended condition of approval. The management of the child care centre is covered in the Deed of Agreement, with the centre to be owned and managed by RRCS, with 40 spaces available to the public with preference given to high need groups as defined by the Department of Children's Services. The final number of spaces to be provided for each age group will be determined in the application to be lodged with Council.

5.5 TRAFFIC

Traffic issues relating to the development were addressed in detail in the assessment of the Concept Plan. The proposed traffic and access arrangements proposed in this application are consistent with the Concept Plan approval, as well as the Deed of Agreement with Council. These include the following works:

- Roundabouts at the intersections of Morrison Road with Princes Street, Payten Street and Douglas Street;
- Roundabout on Charles Street at the entrance to the site;
- Traffic calming devices on Morrison Road and Charles Street, including road narrowing and contrasting pavement.

The issues raised in the submissions by the Ministry of Transport and RTA have been addressed by the proponent in the PPR. Conditions are recommended for the most significant issues, including the following:

- Roads and paths to be designed in accordance with relevant standards as prescribed by the RTA;
- Line marking and signage within the site;
- Provision of minibus parking;
- Provision of bicycle storage and amenities;
- Preparation of a Travel Access Guide and promotion of the use of car share schemes.

In regards to pedestrian and bicycle linkages, plans and cross sections were provided with the application detailing the pedestrian and bicycle paths for the part of the site subject to this application. Additional details will be provided in applications for the development of the residential lots. It is considered that the proposal is satisfactory in this regard.

5.6 DRAINAGE

Council raised a number of concerns about the technical design details for drainage works, in particular the stormwater detention basin on the site, as these works are to be dedicated to Council under the Deed of Agreement. The concerns were addressed by Cardno Willing Pty Ltd on behalf of the proponent and submitted with the PPR, and included additional details such as the use of Council's standard floodway signs and amended retaining wall materials, and revised plans. The revised Statement of Commitments in the PPR state that further consultation will take place with Council in the preparation of final design details of the drainage works. Notwithstanding this, section 4 of the Deed of Agreement specifies arrangements for the finalisation of the detailed design of public open space and drainage works, including further consultation between Council and the proponent. Due to the additional consultation that has been agreed to by both parties, the issue is considered to be satisfactorily addressed, and no additional conditions are recommended to address this issue.

5.7 DISABLED ACCESS

The site has a varied topography, with the Health Facility Main Building on the high part of the site. Patients and clients with different levels of mobility will be moving between the Health Facility, Weemala, Pharmacy building and other community and recreational facilities on the site. Design components that have been incorporated into the proposal include 1:14 ramps from the street to the new Weemala entries, and changes to the locations of pedestrian crossings in the PPR to ensure adequate access from Weemala to the Main Building. Recommendations were also made in the access report (Appendix O of the EA) including compliance with relevant Australian Standards and the Building Code of Australia. This issue is considered to have been satisfactorily addressed.

5.8 HERITAGE

The existing building on the RRCS site are not listed as heritage items under Council's planning instruments, and are not listed as State Heritage Items. Submissions from the public claimed that the Weemala building is a State heritage item, however this facility is incorrectly listed on the Department of Health's heritage register as it is no longer owned by NSW Health. Notwithstanding this, the demolition of Weemala is not being proposed in this application.

The Historical Archaeological Assessment submitted with the EA incorrectly listed NSW Health as the owner of the site. This was corrected in the revised report submitted with the PPR. No other changes to the report were made.

The Statement of Commitments was revised in the PPR to include a commitment for the Council's Heritage Advisory Committee to be consulted prior to the finalisation of the heritage interpretation strategy for the site. This is supported by the Department and is considered to satisfactorily address Council's concerns about this issue.

5.9 PUBLIC INTEREST

The public interest can be satisfied on the basis that the proposed health facility will provide a modern rehabilitation centre, along with high care residential facilities, and additional open space, community and infrastructure works that will be of benefit not just for existing clients of the RRCS, but also for the wider community.

6 CONSULTATION AND ISSUES RAISED

6.1 PUBLIC EXHIBITION DETAILS

The EA was publically exhibited from 21 May 2008 until 20 June 2008 for a period of 31 days and was published in the Northern District Times, Sydney Morning Herald. Copies of the EA were also available for inspection at City of Ryde Council offices and the Department of Planning's offices in Sydney during the exhibition period. Details of the application were placed on the Departments website, in accordance with S75 of the Act.

The advertisement provided details of the proposal, exhibition locations at and dates, and how interested parties could make a submission.

6.2 AGENCY SUBMISSIONS

The Department received 4 submissions from Government agencies in response to the public exhibition of the project. The following issues were raised:

Agency	Issues Raised
City of Ryde	<ul style="list-style-type: none">• Weemala residents should have opportunity to be accommodated in the new facility.• Conditions should be included to reinforce Statement of Commitments.• Council should have input into interpretation of the site's heritage values.• Not clear why Health Facility is smaller than in the Concept Plan approval.• Conditions should be included for further liaison with Council for child care/community centre building and works to be dedicated to Council.• Siting of Pharmacy building should be reconsidered to maintain alignment of shops in Morrison Road.• Adequate access from Weemala to Recreation Circle, Health Facility, Putney shops etc.• Public domain works in Putney shopping centre should be linked to proposed for better physical and visual connections.• Drainage proposal do not meet Council's requirements.
Ministry of Transport	<ul style="list-style-type: none">• More detailed assessment needed for the transport impacts of the current proposal.• Little detail on pedestrian or bicycle linkages provided.• Minimalist approach to car parking should be undertaken.
RTA	<ul style="list-style-type: none">• Car parking to comply with relevant Australian Standards.• Minibus parking should be considered.• Safe and convenient bicycle parking and changing rooms/lockers.• Safety issues including clear delineation of entry/exit points site lines, line

	<p>marking, adequacy of loading dock manoeuvring, clear signage and markings for pedestrian crossing and travel paths, provision of pram ramps, vehicles located wholly on site before being required to stop</p> <ul style="list-style-type: none">• Adequacy of traffic management plan.
NSW Health	<ul style="list-style-type: none">• Consultation was not required as a clinical services plan was not provided. No other issues raised by NSW Health.

A summary of the response to these issues is located at **Appendix C**, as well as a discussion of the major issues in sections 5 and 6 of this report.

6.3 PUBLIC SUBMISSIONS

The Department received a total of 9 submissions from the public, including 5 letters from one community group, and 2 from another individual.

The issues raised in the letters included future of Weemala residents, heritage significance of Weemala, permissibility of use of the Pharmacy building. A more detailed summary of the public submissions is located at **Appendix C**.

7 CONCLUSION

The Department has assessed the EA and considered the submissions in response to the proposal. The key issues raised in submissions related to consistency with the Concept Plan, and future of Weemala residents, Deed of Agreement with Council, drainage, traffic and access. The Department has considered these issues and a number of conditions are recommended to ensure the satisfactory addressing of these issues and minimal impacts as a result of the proposal.

The proposed development will allow for the provision of a new, modern rehabilitation and specialised care centre, whilst also providing new open space and community facilities. Furthermore, the project application has satisfied the environmental assessment requirements, generally complied with the existing environmental planning instruments and generally meets the intent of the existing approved Concept Plan.

On these grounds, the Department considers the site to be suitable for the proposed development and that the project is in the public interest. Consequently, the Department recommends that the project be approved, subject to the conditions of approval.

8 RECOMMENDATION

It is recommended that the Minister:

- (A) **consider** the findings and recommendations of this report; and
- (B) **approve** the proposal under section 75J(1) of the NSW *Environmental Planning and Assessment Act, 1979*, subject to conditions, and **sign** the Determination of the Major Project (**Tag A**).

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APPENDIX A. CONDITIONS OF APPROVAL

APPENDIX B. STATEMENT OF COMMITMENTS

APPENDIX C. RESPONSE TO SUBMISSIONS

APPENDIX D. COMPLIANCE WITH RELEVANT EPIS

APPENDIX E. CONCEPT PLAN APPROVAL
