

**MAJOR PROJECT ASSESSMENT:
Alterations and Additions to Sydney
Adventist Hospital
Wahroonga
MP 10_0070**



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

February 2011

ABBREVIATIONS

CIV	Capital Investment Value
Council	Ku-ring-gai Council
Department	Department of Planning
DGRs	Director-General's Requirements
Director-General	Director-General of the Department of Planning
EA	Environmental Assessment
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPI	Environmental Planning Instrument
MD SEPP	State Environmental Planning Policy (Major Development) 2005
Minister	Minister for Planning
PAC	Planning Assessment Commission
Part 3A	Part 3A of the <i>Environmental Planning and Assessment Act 1979</i>
PEA	Preliminary Environmental Assessment
PFM	Planning Focus Meeting
PPR	Preferred Project Report
Proponent	Sydney Adventist Hospital
RtS	Response to Submissions
SAH	Sydney Adventist Hospital

Cover Photograph: aerial perspective from the north-east

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*NSW Government
Department of Planning*

EXECUTIVE SUMMARY

Sydney Adventist Hospital (SAH) is seeking approval for staged alterations and additions, including refurbishments, to its hospital site located on the corner of Fox Valley Road and The Comenarra Parkway, Wahroonga. The site, commonly referred to as the 'SAN', is within the Central Precinct of the Wahroonga Estate and is approximately 3km south of Hornsby Town Centre.

The application is proposed in accordance with the provisions of the Wahroonga Estate Concept Plan (MP 07_0166), which was approved by the Minister for Planning on 31 March 2010. This approval specifically included an additional 28,000m² of hospital floor space and 3,500m² for an upgraded Faculty of Nursing on the SAN site, subject to the lodgement and approval of a more detailed application under Part 3A or Part 4.

The subject proposal would provide an additional GFA for the SAN hospital of 27,993m², which equates to a total floor space of 86,441m² once the staged additions are completed. A new Education Centre for the Faculty of Nursing has a proposed GFA of 3,490m².

The project also proposes additional permanent car parking in the form of a new multi-level car park in the location of the existing at-grade car park at the rear of the SAN site, resulting in a net additional 561 permanent spaces (922 in total for use by hospital staff and visitors), and the expansion of existing at-grade staff car parks to the west, providing an additional permanent 86 spaces. A temporary car park accommodating 258 cars during construction of the staged development also forms part of this application.

The proposal has a Capital Investment Value (CIV) of **\$283.3 million** and is anticipated to generate **400** full time equivalent construction jobs and **1600** full time equivalent operational jobs following completion of all stages of development.

The Wahroonga Estate concept plan determination states that *"under section 75P(1)(b) of the Act, approval to carry out the project or any particular stage of the project is to be subject to the provisions of Part 4 of the Act, except where it meets the criteria in Schedule 1 of the Major Development SEPP"*.

On 13 May 2010, the Director, Government Land and Social Projects, as a delegate for the Minister, formed the opinion that the project is a major project pursuant to Clause 18 of Schedule 1 of the MD SEPP, as it is a hospital with a CIV of more than \$15 million. Therefore the Minister is the approval authority.

The site is zoned SP1 Special Activities – Health Services Facility under the MD SEPP. The subject proposal is permissible in this zone.

The proposal was exhibited from 15 September 2010 until 15 October 2010. The Department received 9 submissions during the exhibition of the EA – 6 submissions from public authorities (including Ku-ring-gai Council) and 3 submissions from the general public, one of which supported the proposal. Key issues raised in the submissions included: urban design and long term planning, relationship with the overall Wahroonga Estate Concept Plan, increased car parking and the potential impacts on achieving sustainable transport measures and impacts on amenity of surrounding locality.

On 11 November 2010 the Proponent submitted a Preferred Project Report to address the issues raised during the exhibition of the project. Key additional details to the proposal include:

- Additional documentation such as a materials board, supplementary architectural drawings that include additional section and elevational details, photomontages, and GFA schedule to clarify compliance with the relevant planning controls for the Wahroonga Estate; and
- A revised Statement of Commitments to mitigate and/or minimise the potential impacts of the development.

The Department has considered all relevant documents and submissions in accordance with the objects of the EP&A Act and has found the key issues associated with the project include:

- Compliance with Concept Plan & MD SEPP
- Built Form & Urban Design
- Transport
- Open Space & Landscaping
- Amenity
- Heritage
- ESD
- Bushfire Protection
- Flora & Fauna
- Construction Management
- Public Interest

The Department is satisfied that the impacts of the proposed development have been adequately addressed within the Environmental Assessment, Preferred Project Report and revised Statement of Commitments, and can be adequately managed through the imposition of the recommended conditions of approval.

Accordingly, the Department considers the project is in the public interest and recommends its approval, subject to conditions.

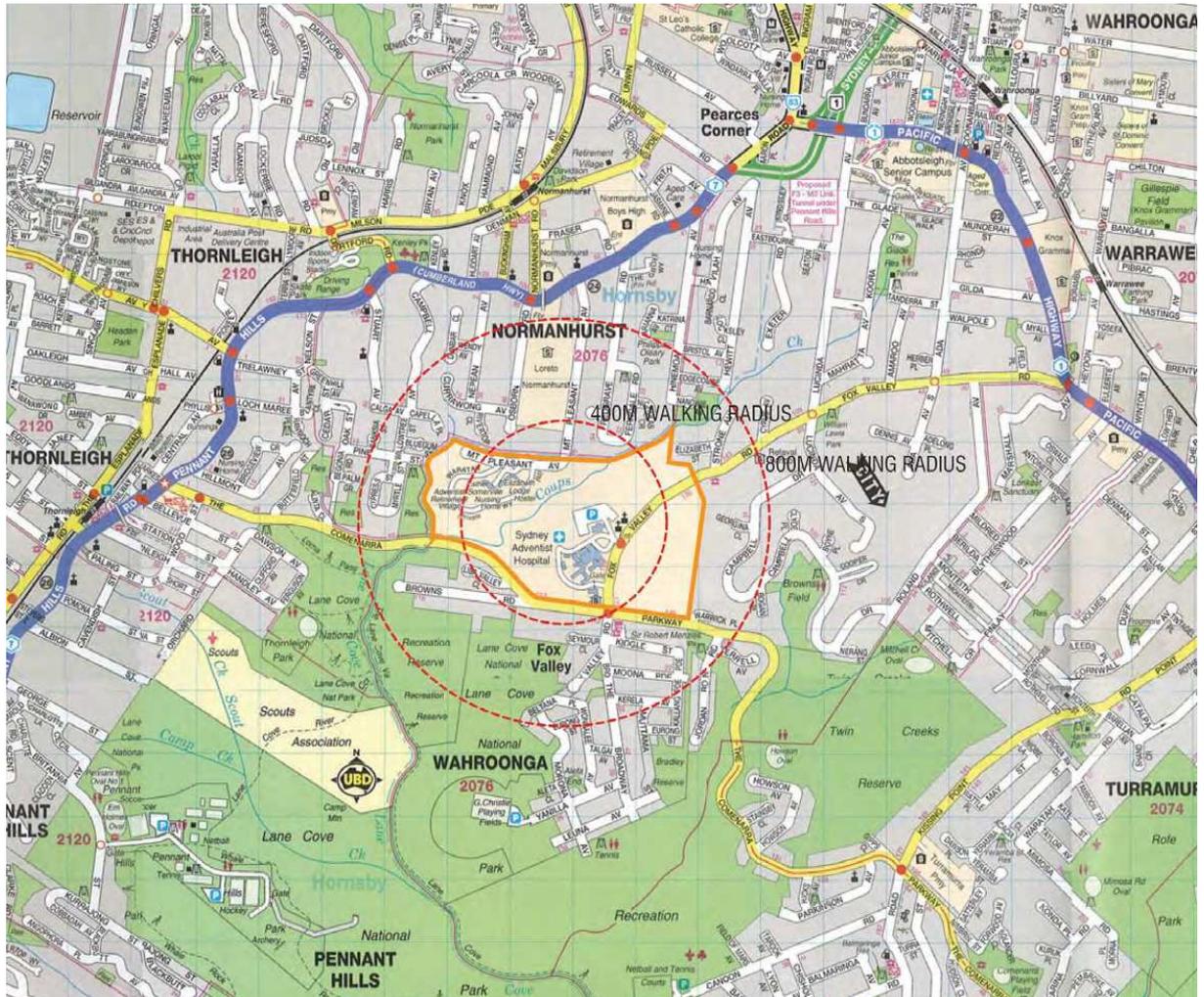
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1. BACKGROUND

Sydney Adventist Hospital (the Proponent) proposes alterations and additions to their existing hospital facility at 185 Fox Valley Road, Wahroonga. The SAN hospital is within the Wahroonga Estate site, which is located on the boundary of Ku-ring-gai and Hornsby Local Government Areas within the suburbs of Wahroonga and Normanhurst. The site is approximately 18km northwest of the Sydney CBD and 1km south of the intersection of the Pacific Highway, Pennant Hills Road and the F3 Freeway. **Figure 1** shows the subject site and the surrounding locality.

Figure 1: Site Location



The majority of the 62.4ha Wahroonga Estate site is located within the Ku-ring-gai Local Government Area, with a small portion located in the Hornsby Local Government Area. It consists of 59 separate property titles managed by the Australasian Conference Association as property trustees of the Seventh Day Adventist Church and 2 titles in private ownership.

Figure 2 shows an aerial photograph of the Wahroonga Estate site and surrounds. Features of the site include:

- Frontages to both Fox Valley Road and The Comenarra Parkway
- Northern access from Mount Pleasant Avenue
- Sydney Adventist Hospital, ancillary medical services, health education facilities and associated car parking

- Fox Valley Seventh Day Church, headquarters and associated community facilities
- Retirement Village and aged care accommodation
- Wahroonga Adventist Primary School
- Residential dwellings and staff housing
- Large areas of remnant vegetation including species of national environmental significance.

Figure 2: Aerial Photograph of Wahroonga Estate (with SAN)



Land uses surrounding the subject site comprise of residential and commercial development, aged care and retirement accommodation, and open space and bushland, ranging from managed landscaped gardens and lawns to remnant urban bushland. The land immediately surrounding the Wahroonga Estate is predominantly residential development, with large areas of native bushland.

Wahroonga Estate Concept Plan

The Minister for Planning approved the Wahroonga Estate Concept Plan (MP 07_0166) on 31 March 2010. The Concept Plan allows for the expansion of the existing Sydney Adventist Hospital, new low, medium and high density dwellings, supporting commercial and community uses and conservation land. Approval was not sought for development of buildings or subdivision, rather Concept Plan approval was granted for the following key elements:

- General layout of land uses.

- Maximum gross floor areas for land uses.
- Maximum number of dwellings and other accommodation types.
- Building heights.
- Asset Protection Zones.
- Road design and traffic management works.
- Landscape, open space and public domain treatments.

The Concept Plan also provides for the protection and management of conservation areas and protection of heritage items.

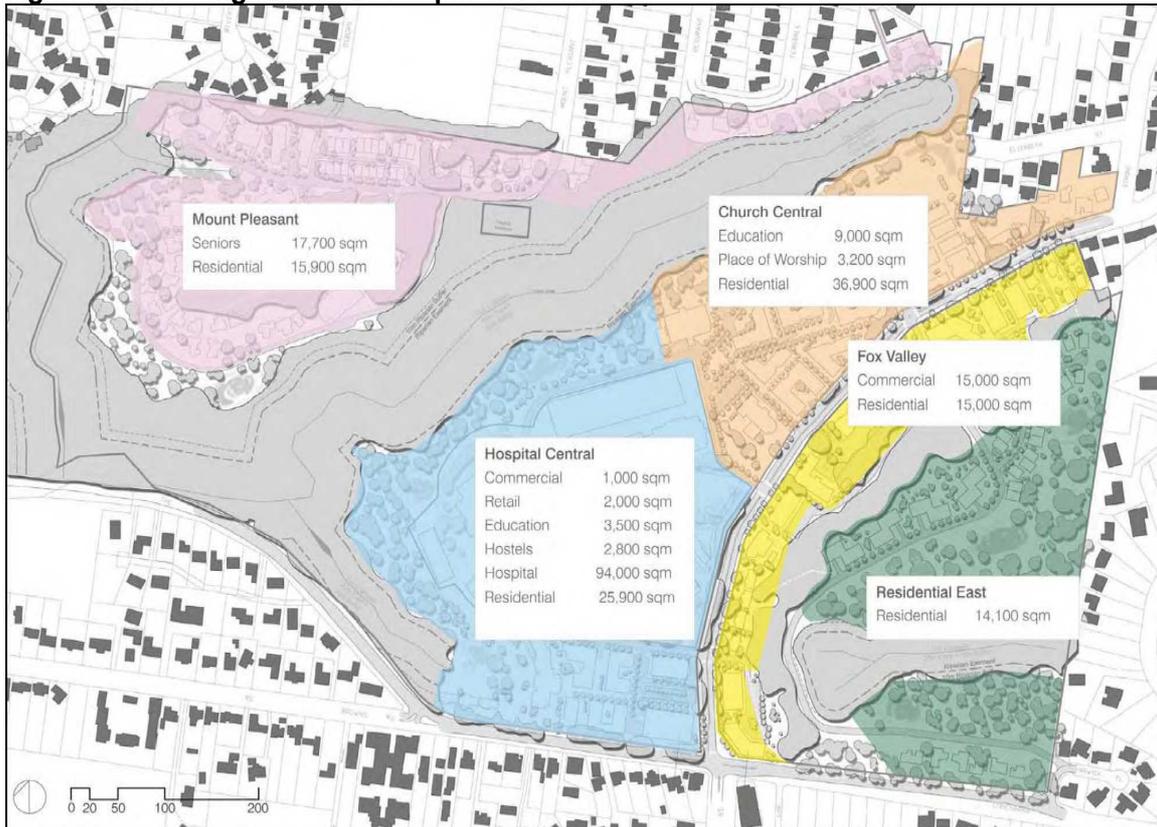
The Concept Plan layout, as approved, is shown in **Figure 3** below.

Figure 3: Wahroonga Estate Concept Plan Layout



The Concept Plan was broken up into five development precincts. The precincts and proposed GFAs are shown in **Figure 4** below:

Figure 4: Wahroonga Estate Development Precincts



The SAN hospital is within Precinct C: Central Hospital of the Wahroonga Estate, as identified in the approved Concept Plan. Precinct C comprises the existing hospital development (SAH), a school, churches, residential accommodation and car parking. The campus-style hospital layout contains numerous buildings providing various hospital-related services. An aerial photograph detailing the existing development and building location plan is provided in **Figures 5 and 6**.

Figure 5: Existing Development and Site Layout

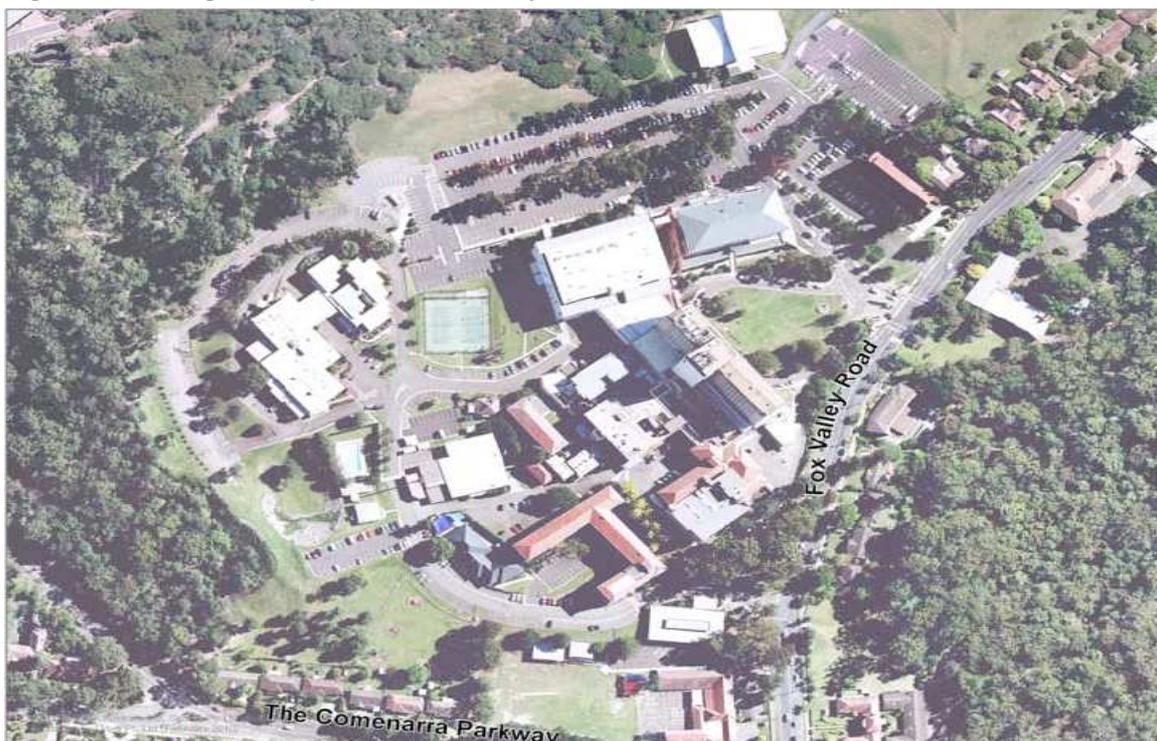


Figure 6: Existing Building Location Plan

2. PROPOSED PROJECT

2.1. Project Description

The Wahroonga Estate Concept Plan Approval includes 28,000m² of additional floor space for the SAH. To facilitate the construction of these approved hospital additions, this project application proposes to undertake staged alterations and additions to the existing buildings on the SAH site, including:

- Stage 1A – Construction of the first stage of Clinical Services Building (CSB) extension, multi-deck car park and extensions to at grade car parks, temporary car park and perimeter road, landscaping works, upgrading of services and refurbishment works;
- Stage 1B – Construction of second stage of CSB, regrading and resurfacing of loading dock and landscaping;
- Stage 2 – Construction of concourse, arrival podium and main entry road works, education centre and refurbishment works; and
- Stage 3 – Demolition of existing Shannon Wing and replacement with new wing and ancillary car parking, relocation of Bethel House and Memorial Fountain and refurbishment works.

Specifically, the Project Application seeks consent for works as described below.

Stage 1A

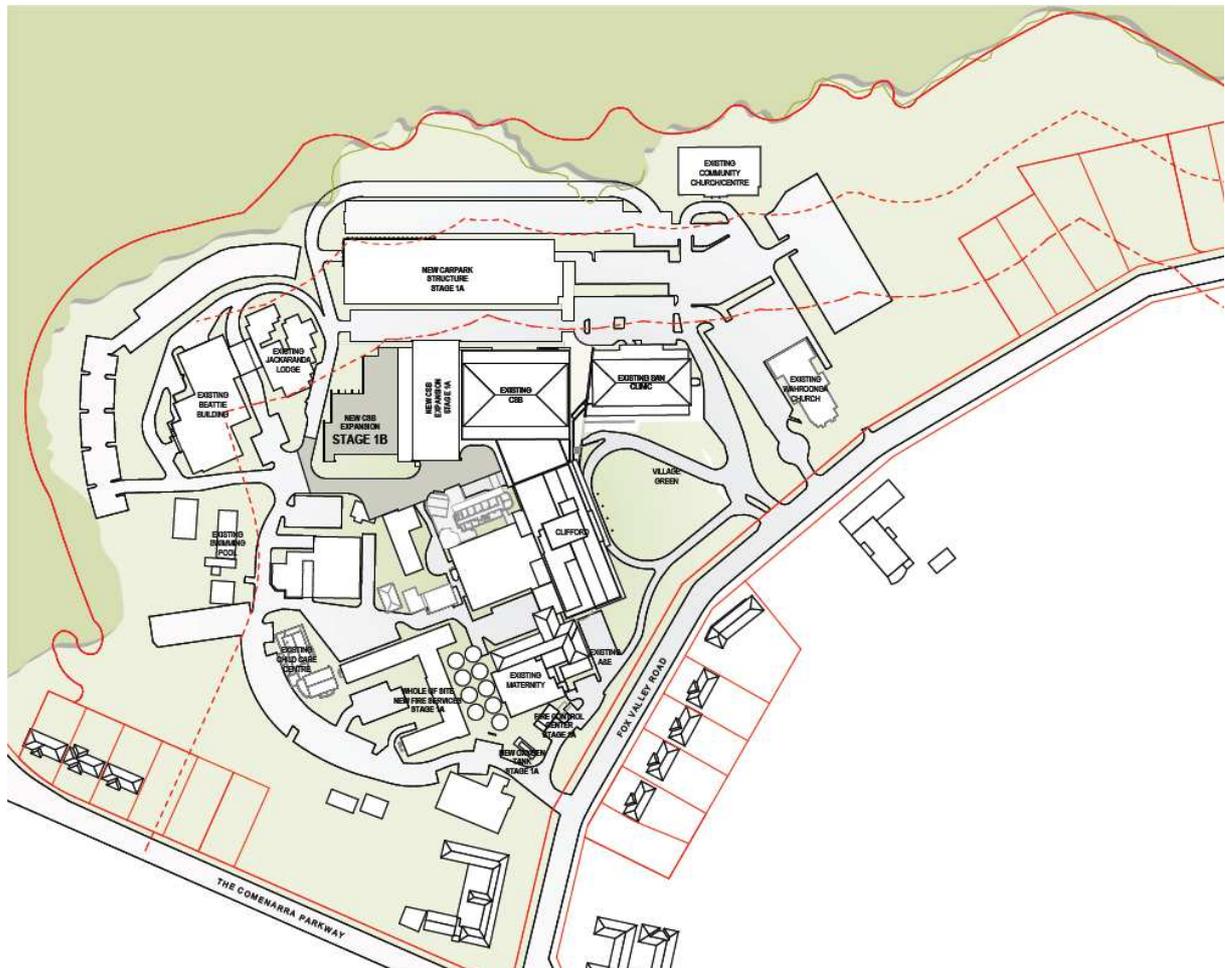
Expansion of the Clinical Services Building (CSB) to the west of the existing structure and comprising a Surgical Precinct with the following features:

Level	Key Features
1	IT Centre
2	Medical consulting rooms pre-admissions clinic and waiting area day infusion centre compounding lab
3	ICU Medical imaging Loading dock Medical gases Linen rooms, fire control panel, sprinkler valve room
4	Day surgery centre - endoscopy suite, operating theatre, pre and post operative beds, waiting and change rooms, pre admission office, CSSD expansion
5	Operating theatre expansion – 6 theatres, set up area and pre operative beds, waiting and change rooms
6	Plant room above theatres with additional plant serving down to Level 1 and up to Level 10
7-10	Typical surgical ward floors (total 112 beds)

- Refurbishment of existing hospital buildings as follows:
 - Refurbishment of Level 4 Day Surgery, including access connection to new multi-level car park.
 - Expansion of doctors and nurses lounge.
 - Location of concierge station, public toilets and waiting area adjacent to arrival lifts.
 - Rationalising of Central Sterilising Services Department (CSSD) to enable clear connection to new expansion of CSSD.
 - Refurbishment of Level 5 Pre Operative and First Stage Recovery Area
 - Expansion of ICU/CCU.
 - Relocation of Pathology Department to Level 2.
- Provision of additional ancillary car parking on a permanent basis, including:
 - Construction of multi-level car park in location of existing at-grade car park, resulting in a net additional 561 permanent on-site spaces (922 in total for use by hospital staff and visitors).
 - Expansion of existing at-grade staff car parks to the west, providing an additional permanent 86 spaces.
- Provision of a temporary car park accommodating 258 cars during construction of the staged development.
- A new perimeter road around the multi-level car park, connecting to the existing main access road and existing service road.

- Regrading and resurfacing of truck turning area to provide clear trucking access to the future Shannon materials handling area.
- Landscaped area to Level 2, to be developed as a visual release to the Radiation Oncology, Day Infusion and Consulting Suites.

Figure 8: Stage 1B site plan



Stage 2

- Construction of the Concourse - an open, covered walkway between the existing CSB and San Clinic buildings, providing a link to the main hospital entry and patient admissions area in the existing building.
- Construction of a new entry to the hospital and link from multi-level car park to the CSB and SAN Clinic.
- Construction of a 3-4 storey Education Centre, with frontage to Comenarra Parkway.
- Refurbishment of Level 2 of existing hospital building to accommodate Pathology Department and Central Pharmacy, and relocation of Nursing Faculty to new Education Centre.
- Upgrade of main entry from Fox Valley Road to car park, removal of ring road around village green and upgraded landscaping of village green.

Figure 9: Stage 2 site plan

3. STATUTORY CONTEXT

3.1. Major Project

On 31 March 2010, the Minister for Planning approved a concept plan for the Wahroonga Estate. The concept plan determination states that *“under section 75P(1)(b) of the Act, approval to carry out the project or any particular stage of the project is to be subject to the provisions of Part 4 of the Act, except where it meets the criteria in Schedule 1 of the Major Development SEPP”*.

On 13 May 2010, the Director, Government Land and Social Projects, as a delegate for the Minister, formed the opinion that the project is a major project pursuant to Clause 18 of Schedule 1 of the MD SEPP, as it is a hospital with a CIV of more than \$15 million. Therefore the Minister is the approval authority.

On 18 November 2008, the Minister for Planning delegated to the Planning Assessment Commission the function as a consent authority to determine a project application under section 75J and 75JA of the Environmental Planning and Assessment Act 1979 if the application:

- has a reportable political donation; or
- is within the electoral district of the Minister for Planning; or
- in which the Minister has a pecuniary interest

The Proponent has disclosed a reportable political donation. Consequently, this project meets the terms of the Minister's delegation requiring the application to be determined by the Planning Assessment Commission under delegated authority.

3.2. Permissibility

The site is zoned SP1 Special Activities – Health Services Facility under the MD SEPP. The subject proposal is permissible in this zone.

3.3. Environmental Planning Instruments

Under Sections 75I(2)(d) and 75I(2)(e) of the EP&A Act, the Director-General's report for a project is required to include a copy of, or reference to, the provisions of any State Environmental Planning Policy (SEPP) that substantially governs the carrying out of the project, and the provisions of any environmental planning instruments (EPI) that would (except for the application of Part 3A) substantially govern the carrying out of the project and that have been taken into consideration in the assessment of the project.

The Department's consideration of relevant SEPPs and EPIs is provided in Appendix D.

3.4. Objects of the EP&A Act

Decisions made under the EP&A Act must have regard to the objects of the Act, as set out in Section 5 of the Act. The relevant objects are:

- (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.*

The Department has considered the objects of the EP&A Act and determined that the application is consistent with the relevant objects. The assessment of the application in relation to these relevant objects is provided below and in Section 5.

3.5. Ecologically Sustainable Development

The EP&A Act adopts the definition of Ecologically Sustainable Development (ESD) found in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of:

- (a) *the precautionary principle - namely, that 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. In the application of the precautionary principle, public and private decisions should be guided by:*
 - (i) *careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment, and*
 - (ii) *an assessment of the risk-weighted consequences of various options,*
- (b) *inter-generational equity - namely, that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations,*
- (c) *conservation of biological diversity and ecological integrity - namely, that conservation of biological diversity and ecological integrity should be a fundamental consideration,*
- (d) *improved valuation, pricing and incentive mechanisms - namely, that environmental factors should be included in the valuation of assets and services, such as:*
 - (i) *polluter pays—that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement,*
 - (ii) *the users of goods and services should pay prices based on the full life cycle of costs of providing goods and services, including the use of natural resources and assets and the ultimate disposal of any waste,*

- (iii) *environmental goals, having been established, should be pursued in the most cost effective way, by establishing incentive structures, including market mechanisms, that enable those best placed to maximise benefits or minimise costs to develop their own solutions and responses to environmental problems.*

Detailed assessment of the economic and environmental issues associated with the project is provided in Section 5. The proposal is located within an urban footprint on a previously developed and disturbed site and would not result in loss of any threatened or vulnerable species, populations, communities or significant habitats. The site will not be impacted by changes in sea level rising resulting from climate change. The Proponent has incorporated ecologically sustainable design initiatives in this proposal.

On the basis of this assessment, the Department is satisfied that the proposal encourages ESD, in accordance with the objects of the EP&A Act.

3.6. Statement of Compliance

In accordance with section 75I of the EP&A Act, the Department is satisfied that the Director-General's environmental assessment requirements have been complied with.

3.7. Consistency with approved Concept Plan

The proposed hospital redevelopment is consistent with the terms of approval of the Wahroonga Estate Concept Plan as it will facilitate the redevelopment of the SAH as envisaged in the concept plan. A detailed assessment of the proposal against the concept plan approval is provided in Section 5 of this report.

4. CONSULTATION AND SUBMISSIONS

4.1. Exhibition

Under section 75H(3) of the EP&A Act, the Director-General is required to make the environmental assessment (EA) of an application publicly available for at least 30 days. After accepting the EA, the Department publicly exhibited it from 15 September 2010 until 15 October 2010 (31 days) on the Department's website, and at the Department's Information Centre and Ku-ring-gai Council. The Department also advertised the public exhibition in *The Sydney Morning Herald*, *The Daily Telegraph* and *The Hornsby Advocate* on Wednesday 15 September 2010 and notified landholders and relevant State and local government authorities in writing.

The Department received 9 submissions during the exhibition of the EA - 6 submissions from public authorities and 3 submissions from the general public.

A summary of the issues raised in submissions is provided below.

4.2. Public Authority Submissions

Six submissions were received from public authorities. The issues raised are summarised below.

Northern Sydney Central Coast Area Health Service (NSCCAHS)

Whilst specific objection was not raised about the subject proposal, NSCCAHS identified factually incorrect information provided in the SAN Social and Economic Benefits Report.

Comment

This was noted and forwarded to the Proponent, who subsequently corrected the errors.

Roads and Traffic Authority

The proposal and its traffic impacts were considered by the Sydney Regional Development Advisory Committee (SRDAC), which provided recommendations and conditions for inclusion in the determination of the application.

Specifically, it recommended that a binding Deed of Agreement be entered into between the Proponent and the RTA and Council to undertake works specified in Condition B7 of the Wahroonga Estate Concept Plan approval (MP 07_0166) relating to the upgrade of existing traffic signals, intersection improvements and road widening works.

Comment

The Proponent of this proposal is different to that of the Concept Plan approval, thus SAH does not have a role in the execution of the Deed of Agreement as required by Condition B7. The Deed of Agreement as required by Condition B7 of MP 07_0166 is to be signed and executed prior to the release of the first Construction Certificate for the site, thus the subject development relies on this action prior to commencement of works.

Ku-ring-gai Council

Council submitted a comprehensive submission strongly supporting the expansion of the hospital facilities, however in light of the DGRs, raises key concerns with aspects of the proposed development. Key issues include: absence of Biodiversity Management Plan (BMP), lack of plans showing the relationship between the hospital masterplan and the Wahroonga Estate Concept Plan approval, proliferation of car parks and the need for underground car parking, inadequate ESD principles, removal of trees and lack of adequate open space, and bushfire protection.

Comment

The BMP has been approved by the Department of Sustainability, Environment, Water, Population and Communities (DSEWPC) as per Condition B4 of the Wahroonga Estate Concept Plan approval and submitted with the PPR. Compliance with this BMP is part of the Proponent's Statement of Commitments. Other key issues raised by Council have been responded to in the PPR and discussed in Section 5 of this report.

Transport NSW

Concern was raised regarding a perceived 'pro rata' increase in existing car parking and the potential impacts on achieving sustainable transport measures. Consideration of a car share scheme and the provision of bicycle parking in suitable locations were also requested in the submission.

Comment

Car parking associated with a hospital is not directly a floor space pro-rata relationship and is discussed in Section 5 of this report. Sustainable transport measures, such as car sharing with staff, are also discussed.

Sydney Water

Required that drinking water main is to be upsized to a 200mm main and the wastewater main is required to be upsized to a 400mm main to service the proposed development.

Comment

In consultation with their engineers, the Proponent acknowledges that the water and sewer mains will need to meet additional demand generated by the proposal. However, as works are to be staged over time, it is considered appropriate to stage delivery of services upgrade over time. The Proponent intends to resolve this matter with Sydney Water as part of the Section 73 certificate process, which is also covered by a condition in the recommended instrument of approval.

DECCW

Concern was raised that the EA did not adequately address the requirement for consistency with a Biodiversity Management Plan (BMP) as per Condition B4 of the Wahroonga Estate Concept Plan Approval, and recommended that a BMP, including a Fire Management Plan, be finalised and approved prior to determination of the application.

Comment

A BMP has been prepared by the Proponent as per Condition B4 of the Wahroonga Estate Concept Plan Approval and approved by the Department of Sustainability, Environment, Water, Population and Communities (DSEWPC).

4.3. Public Submissions

Three submissions were received from the public. Of the three public submissions, two (66.7%) objected to the project and one (33.3%) supported the project. The key issues raised in public submissions are listed in Table 1.

Table 1: Summary of Issues Raised in Public Submissions

Issue	Proportion of submissions (%)
Growth and expansion will provide high-quality health care	33.3%
Paid on-site parking will adversely affect public roadways and local amenity as available free on-street parking will be utilised by hospital clients who do not wish to pay.	33.3%
Development of bushland will encroach on existing residential property	33.3%

The Department has considered the issues raised in submissions in its assessment of the project in Section 5.

4.4. Proponent's Response to Submissions

The Proponent provided an initial response to the issues raised in submissions on 11 November 2010 (see Appendix C). The response included a Preferred Project Report which provides amended and updated drawings and additional visual material, and a revised Statement of Commitments to mitigate and/or minimise the potential impacts of the development. Further information was provided on 13 December 2010, including a final version of the BMP.

5. ASSESSMENT

The Department considers the key environmental issues for the project to be:

- Compliance with Concept Plan & MD SEPP
- Built Form & Urban Design
- Transport
- Open Space & Landscaping
- Amenity
- Heritage
- ESD
- Bushfire Protection
- Flora and Fauna
- Construction Management
- Public Interest

5.1. Compliance with Concept Plan & MD SEPP

The subject proposal complies with the approved Wahroonga Estate Concept Plan as it provides for the expansion of the existing hospital facility within the development controls that apply to the site.

The Wahroonga Estate Concept Plan approved 115,000m² maximum GFA for Precinct C, of which 28,000m² of additional floor space is allocated for the upgrade and expansion of the SAN hospital (providing a total of 94,000m²), and 3,500m² for expansion of the Faculty of Nursing.

The Concept Plan does not provide specific details regarding the allocation of this additional floor space in terms of building siting and design, and this was generally deferred to be dealt with at the project application stage. The Concept Plan approval does not contain maximum height controls.

The State Significant Site listing in the MD SEPP also permits a maximum GFA of 115,000m² within Precinct C and establishes a maximum building height of 39.5 metres.

The proposed additional GFA for the hospital is 27,993m², which equates to a total floor space of 86,441m² once the staged additions are completed. The Education Centre associated with the Faculty of Nursing has a proposed GFA of 3,490m². This totals 89,931m² of floor space for Precinct C, which complies with the Concept Plan and MD SEPP controls.

The Central Services Building (CSB) at its highest point is 39.23m above ground level and the Shannon Building at its highest point is 39.16m above ground level, meaning both buildings are within the maximum building height of 39.5m as prescribed by the MD SEPP.

The Concept Plan approval required further approvals and modifications to be met prior to lodging a Project Application. Specifically, a Biodiversity Management Plan (BMP) was to be prepared and approved by the Commonwealth for the concept plan site. This requirement has been satisfied as a BMP for the Estate has subsequently been approved by DSEWPC.

Council raised concerns that the proposal does not show the relationship, spatially and in terms of staging, between the hospital masterplan and the approved Wahroonga Estate Concept Plan. The PPR provides additional documentation and plans demonstrating the integration between this application and the Wahroonga Estate Concept Plan. It is stated in the PPR that the hospital masterplan for long term future growth, as referred to by Council, is only an internal planning document demonstrating how future growth *could* be accommodated within the existing and proposed development, and is indicative only. The subject proposal has been designed with reference to the Wahroonga Estate Concept Plan approval, as discussed above.

A detailed table outlining the compliance of the Project Application with the relevant provisions of the Concept Plan approval is provided on pages 29-33 of the EA. The Department is satisfied that the subject application is generally consistent with the terms of approval of the concept plan.

5.2. Built Form & Urban Design

The proposed additions and alterations have regard to topography and the existing built form across the site, as well as its surrounding location within the Wahroonga Estate. The expansion, including the new CSB and Shannon Wings, has been designed to respond to the bulk and scale of the existing Main Building as well as the overall campus-style setting that is the SAN hospital site.

The development has been designed to complement the existing built form, taking into account the existing visual dominance of the Main Building (HE Clifford Tower) and the potential impact of additional buildings being provided within the existing site.

Figure 11 shows an aerial perspective of the proposed redeveloped hospital from the north east, with the Main Building clearly visible at the front of the site and the multi-level car park at the rear.

Figure 11: Aerial perspective of the proposed SAH redevelopment

The creation of the new covered, semi-enclosed, major pedestrian thoroughfare – The Concourse – through the central part of the site, adjacent to the eastern side of the Main Building and the existing CSB, will create a major civic space, a major new entry, and improved connectivity between the principal buildings on the site (**Figure 12**).

Figure 12: View of main vehicle entry, including The Concourse

The proposed multi-deck car park structure in the north-west (rear) of the site also connects to the hospital buildings via The Concourse. The perceived scale of the car park structure is reduced by the site's topography and location of an "arrival podium" which essentially divides the car park 'below' and 'above' the podium level (see **Figures 13** and **14**). The location of the car park also provides clear access to visitors entering the hospital as well as for pedestrians from the car park to the hospital.

Figure 13: Hospital main entry at Level 2 Arrival Podium (with multi-level car park on the right)



Figure 14: View of arrival podium from the east



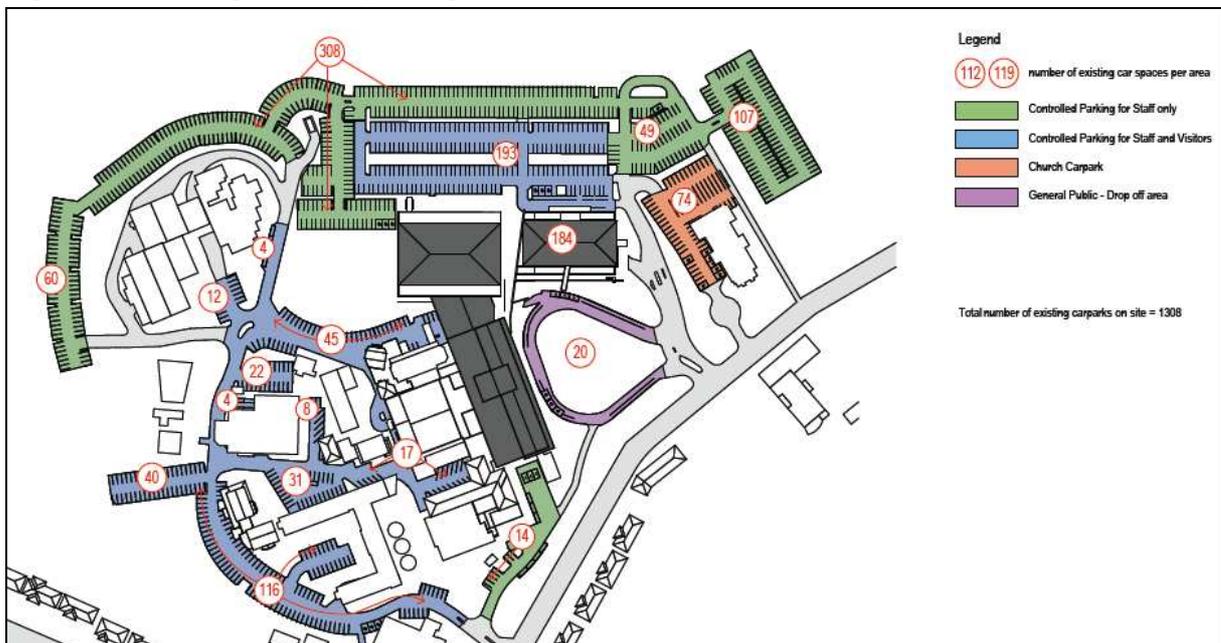
Having regard to the approved increase in floor space, indicative building footprints, internal road location and siting of buildings as stated in the Wahroonga Estate Concept Plan, the proposed built form and design is considered to appropriately respond to the site, existing built form, and surrounding locality whilst meeting the requirements for significant hospital upgrade and refurbishment works. The proposed additions have been sited appropriately with regard to minimising impacts on ecological communities, and to achieve an appropriate relationship with the existing and surrounding development.

5.3. Transport

5.3.1 Car parking

There are currently 1,308 parking spaces on the SAN hospital site, as can be seen in **Figure 15** below.

Figure 15: Existing SAH car parking



An additional 561 permanent on-site spaces will be provided in the proposed multi-deck car park, a further 86 permanent spaces will be provided through the expansion of existing at-grade staff car parks to the west, and a further 206 staff car parking spaces will be provided as part of the new Shannon Wing development. Minor alterations to various other small at-grade parking areas across the SAH site are also proposed. Overall, the development will increase car parking for the SAH to 2,058 spaces, which equates to a net increase of 750 spaces.

Condition B9 of the Wahroonga Estate Concept Plan Approval requires the application to have regard to the RTA's *Guide to Traffic Generating Development* and Council's DCP requirements for car parking for non-residential land uses. The Proponent's traffic consultants considered the above documents and concluded that the RTA's *Guide to Traffic Generating Development* contains criteria for parking at hospitals, however this is based on surveys of small private older style hospitals with an average size of approximately 2000m² and a maximum daytime staff of 100. Council's DCP also contains criteria for parking at hospitals but is relevant to small hospitals and not large hospitals providing a wide range of facilities and services such as the SAH.

The Proponent's traffic consultants submit that car parking demand for a large hospital such as the SAH is a result of a combination of factors, including significant 'overlap' of shifts for staff of some 30 minutes to provide for briefing/updating on patients and significant day-to-day and week-to-week patient admissions (range 200 per week to over 600).

Concern was raised by Transport NSW regarding a perceived 'pro rata' increase in existing car parking and the potential impacts on achieving sustainable transport measures. The Department considers the explanation provided above confirms that the requirements for car parking are not just a floor space pro-rata relationship but, rather a combination of factors associated with the operation of a hospital. Issues of public transport usage are further discussed in Section 5.3.3.

The proposed increase in on-site car parking takes into account previous parking surveys and additional demand arising from the proposed development. On-site car parking is proposed to be staged to respond to:

- Increased staff numbers resulting from hospital expansion.
- Operational characteristics of the hospital, including overlap between shift changes.
- Increased demands by construction workers.
- The need to absorb cars displaced from parking along Fox Valley Road.

Overlap of shifts and day-to-day and week-to-week patient admissions present unique characteristics associated with parking at hospitals. Parking assessment reveals that there is very little on-street or alternative parking available for users of the SAN hospital site. Upon completion of the expansion and upgrade, it is anticipated by the Proponent that the total daily population will increase by about 42%, however the increase during peak times with shift changeover and the like will be about 60%. The proposed parking provision for the project represents an increase of approximately 57%, and is considered reasonable by the Department in light of the operational requirements of the hospital.

It is proposed to retain paid car parking for patients and visitors. Although concern was raised from the public that the provision of paid parking would adversely affect available on-street parking, it is noted that future traffic arrangements along Fox Valley Road will restrict on-street parking, thus negating any potential parking pressure caused by the SAN development. It is also noted that hospital developments in general provide paid parking which is utilised effectively. The Department considers the proposal to retain paid car parking as an adequate response to the hospital upgrade.

The assessment undertaken by the Proponent's traffic consultants, which takes into account current parking space occupancy, population increase on peak days and limited on-street parking supply, is considered to adequately address proposed parking provisions.

5.3.2 Traffic

It is anticipated that a hospital upgrade of this scale will have potential impacts on existing traffic movements, both in terms of construction and operational traffic. An assessment by the Proponent's traffic consultants identified opportunities to upgrade

key intersections to achieve appropriate levels of service and avoid unreasonable impacts on the existing operation of the local and regional road network, including:

Stage 1A

- Initial upgrade at The Comenarra Parkway/Fox Valley Road intersection.
- Installation of 'No Parking' signage along Fox Valley Road (the extent of signposting and details of operational times to be determined by Council and its Traffic Committee).

Stage 2

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

Stage 3

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

Additionally, Condition B7 of the Wahroonga Estate Concept Plan approval requires key intersection upgrades and improvements, key road widenings, key signage, and a traffic management plan as part of addressing the impacts on traffic and transport arrangements around the site.

Whilst a car share scheme has not been considered for this proposal, the Proponent has considered the allocation of spaces for use within an estate managed car share scheme. The EA also outlines the way in which the SAN currently fosters, promotes and supports car sharing with staff. The project also proposes to incorporate bicycle spaces in areas which are sheltered and subject to surveillance.

It is considered that traffic impacts can be managed subject to implementation of the improvements outlined above. The Department has recommended a condition of consent to ensure that road improvements identified occur in accordance with the staged development of the site.

5.3.3 Public transport

SAH already has in place measures in relation to Transport Access and Work Place Travel, including:

- An Access Guide in the form of 'How to Find Us', which is available on the SAH website.
- Funded provision of the bus used for Route 589 bus service which runs through the site and connects to Thornleigh, Waitara and Hornsby railway stations.
- Encouraging and facilitating car pooling.
- Provision of bicycle parking facilities including lockers and showers for staff.
- Provision of a shuttle bus within the site connecting to the external bus stops.

A Transport Access Guide and Workplace Travel Plan has been prepared in accordance with the provisions of the DGRs, having regard to the staged development of both the hospital and Wahroonga Estate generally. The Workplace Travel Plan has been prepared to support the further development of the hospital and the resultant increased travel to/from the site by various users.

The Proponent commits to:

- Constructing pedestrian and bicycle connections located within the SAH site as identified in the Pedestrian and Bicycle Opportunities Plan.
- Providing bicycle storage facilities and end-of-trip facilities.

- Amending the existing 'How to Find Us' guidelines by highlighting and prioritising alternative modes of transport over private vehicles and showing walking/cycling distances from nearby rail stations.
- Implementing the Workplace Travel Plan over two years and evaluating progress/change by repeat survey and audit after three and five years.

The Department is satisfied that the proposal will benefit from current and proposed measures in place to promote non-car use and accessibility to public transport services.

5.4. Open Space & Landscaping

Approximately 40% of the Wahroonga Estate comprises open space and bushland. The SAH site is set amongst landscaped grounds and surrounded by mature trees and plantings. The proposed hospital expansion commits to retaining these mature trees and plantings, and proposes improvements to the existing landscape including:

- Enlarging the 'Village Green', removal of surrounding ring road to provide a new pedestrian path with allied tree planting to link to the new 'Main Building' and 'SAN Clinic Building'.
- New tree planting to replace ageing and lesser quality tree.
- Landscaped treatment of new multi-level car park, including a 'green wall' of climbers to the southern side, and tree planting to the eastern end adjacent to new plaza space.
- Courtyard areas and spaces to the bulk of new buildings to the western side of the existing core hospital area.

The subject development does not propose any buildings on bushland zoned E2 – Environmental Conservation.

Condition B4 – Biodiversity of the approved Wahroonga Estate Concept Plan requires the preparation of a Biodiversity Management Plan (BMP) and its approval prior to the determination of any Major Project Application. A BMP has been prepared by the Proponent as per Condition B4 of the Concept Plan Approval and approved by the Department of Sustainability, Environment, Water, Population and Communities (DSEWPC).

Council raised concern regarding tree removal and outlined that the proposal did not provide adequate and useable open space. The PPR responded by stating that the extent, number and varying types of accessible open space areas proposed for the SAN provide a high level of amenity for the wide range of users of the hospital grounds. The proposed open spaces include:

- The Village Green.
- Broad terraces adjoining the Village Green.
- Reflective garden courtyard adjoining the Chapel adjacent the Village Green.
- Civic plaza space extending from the Concourse, north of the new main entry.
- Large landscaped seating area below the new north entry.
- Open space near the Community Church Centre, with walkways linking into the bushland walkway network.
- Landscaped courtyards to the west of the new CSB.
- Improved amenity/heritage garden adjacent the new location for Bethel House, adjacent to Jacaranda Lodge.

- Jacaranda Lodge landscape courtyard spaces.
- Series of pocket-park type lawn, seating, playground, exercise areas across the north of the site adjacent the edge of the existing bushland.
- Upgrade of the swimming pool area with the additional seating, barbeque and exercise equipment as part of a circuit across the northern part of the site.

Landscape spaces to the north are located to take advantage of views into the adjacent bushland. The Concourse plaza area provides a large civic area with formal and informal seating to take in bushland views, and large canopy trees frame the plaza space. Lawns provide informal opportunity for passive recreation, and further west there are nominated seating/exercise equipment/passive recreation located in close proximity with the edge of the bushland.

Tree retention has been maximised in the design and where removal is required, new tree planting is proposed to create an appropriate setting and relationship to adjacent areas.

The Department considers the proposed open space and landscaping provisions to respond adequately to the scale of alterations and additions whilst also having regard to the existing context of the site and its surrounds. Provisions to soften the impact of the built form and maintaining and enhancing outlooks to landscaped and open spaces have been incorporated into the design and are considered appropriate.

5.5. Amenity

5.5.1 Solar access

Analysis of solar access takes into account both the existing site conditions and potential impacts of the proposed additions. Shadow impacts generated by the proposal will generally be contained within the hospital site, with habitable areas in buildings (i.e. wards) receiving acceptable levels of solar access throughout the day due to the general location and orientation of the buildings. The provision of large landscaped spaces will also enable high levels of solar access.

5.5.2 Acoustic impacts

The Proponent engaged consultants to undertake a quantitative assessment of the potential demolition, construction, operation and traffic noise impacts of the project. Key findings indicate that noise resulting from the general operation of the hospital and site activities, including plant noise, can be adequately controlled using conventional measures – this has been incorporated into the Statement of Commitments. A commitment is also made to the development of a noise management plan for the operation phase of the site with appropriate noise mitigation measures to protect the amenity of neighbouring residents.

5.5.3 Visual impacts

A Visual Impact Analysis was undertaken to assess the potential impact of the development in terms of height, bulk and scale of the proposed building additions with regard to views to the site. This analysis found that visual impacts from the proposed development would be acceptable as the additional built form is proposed to be expanded horizontally in-line with the existing tree line and surrounding landscape, which is considered the element most valuable to the identified views. Views further from the site are minimally impacted as the development appears distant behind a line of trees. The analysis recommends that appropriate materials and finishes be used that respond to the surrounding bushland character of the site.

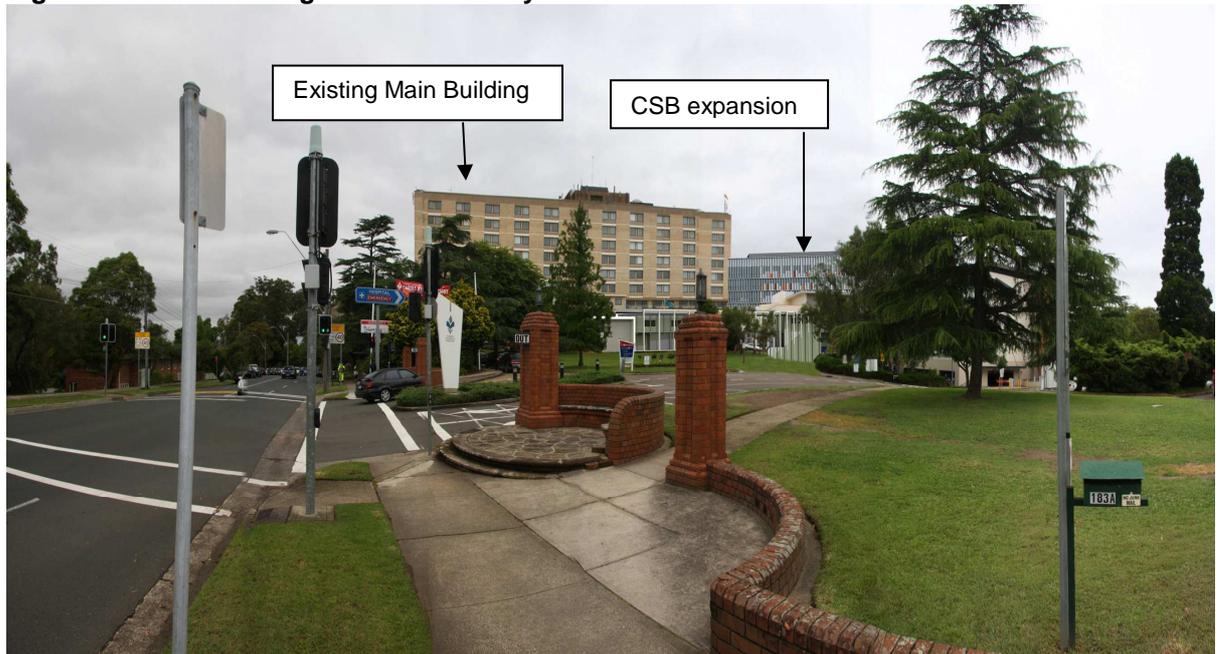
Clarification was sought by the Department following exhibition on visual impacts in relation to height, bulk and scale, particularly as viewed from The Comenarra Parkway and Fox Valley Road. Further details were requested on selection of colours, materials and finishes, the transition of the development through the site and its relationship within the local context, and design of the development with regard to opportunities for reducing bulk towards the top of the buildings (as also noted in the Visual Impact Analysis).

The PPR provided a materials board, supplementary architectural drawings including additional section and elevational details, photomontages of the development as viewed from The Comenarra Parkway and Fox Valley Road supported by a written response from the architects.

Figure 13: Photomontage from Comenarra Parkway



Figure 14: Photomontage from Fox Valley Road



The Department considers the proposed built form additions, including car parking areas, acceptable when viewed from key locations and main roadways. The existing hospital building presents a significant built form in terms of height, bulk and scale and the proposed additions complement this form. The proposed materials and finishes are also considered to be reasonable and will provide for integration with the surrounding landscaped, bushland and residential locality. The Statement of Commitments commits to implementing recommendations in the Visual Impact Analysis.

Council has requested that the proposal provide underground car parking so as to minimise the visual impacts of parking across the site. The PPR states that as additions to the Central Services Building will be staged it is not practical to provide basement parking under this building. The size and layout of the proposed additions would not facilitate an efficient car parking layout and multiple levels would be required thus requiring extensive earthworks. The Shannon Building car park is located partially underground and is considered appropriate.

The PPR details that all aboveground car parking areas are located away from public streets and have been sited and designed to avoid any significant visual impacts.

The perceived scale of the proposed multi-deck car park when viewed from Fox Valley Road is reduced by its location at the lower, rear part of the site, behind the 'core' hospital buildings. The car park structure will only project two levels above the main hospital arrival area whilst the bottom two levels will not be visible.

Currently car parking on the site is at-grade, and the site's topography enables the location of the new multi-deck car park structure to be located in such a way so as to minimise impacts on views. It is also proposed to provide landscaped treatment to the car park structure and other parking areas across the hospital campus to soften their visual impact.

5.5.4 Contamination

Stage 1 assessments previously undertaken for the site have confirmed that the site is suitable for the proposed use. Coffey Environmental prepared a geotechnical and site contamination assessment in early 2008 and Environmental Investigation Services undertook another site contamination investigation in 2009.

A Targeted Contamination Assessment was undertaken by Coffey Environmental to further satisfy Condition B13 of the Wahroonga Estate Concept Plan approval. The assessment discussed the detection of asbestos in shallow soil at two sample locations in the area of the CSB expansion – Stage 1A and 1B. SAH indicated the asbestos impact could be associated with a previously demolished small structure in that area. The report recommends that asbestos impacted soils need to be appropriately managed during works so as not to pose a risk to workers, and that a qualified environmental consultant should be engaged to advise on managing the asbestos impacted soils during redevelopment.

Higher than adopted levels of compounds detected in the areas of the Shannon Ward building and car park Stage 3 are most likely attributable to the petrol underground storage tanks (UST) that had been previously decommissioned. WorkCover records indicate that appropriate procedures had not been conducted during the decommissioning works of these UST, and it is possible that there is residual soil contamination in this area causing groundwater contamination. The

report also states that it is also possible that the groundwater was contaminated by the UST or other sources, prior to removal of the UST. Due to the uncertainty about the extent of groundwater contamination and incorrect decommissioning of the two USTs, report's from the Proponent recommends an additional groundwater assessment be undertaken in this area.

Accordingly, the Department has recommended as condition of approval requiring the Proponent to undertake further contamination assessment as per the recommendations of the Targeted Contamination Assessment undertaken by Coffey Environmental. The Proponent has also committed to this action via their Statement of Commitments.

5.6. Heritage

5.6.1 European heritage

The Adventist Administration Building is the only building in the vicinity that is a locally listed heritage item, and is physically separate from the main hospital buildings. The impact of the subject development on the Administration Building is considered to be very low and a heritage assessment is not required.

A Statement of Heritage Impact addresses the potential impacts on 'Bethel' House and the Shannon Wing, in accordance with the provisions of the Wahroonga Estate Concept Plan. Bethel House is proposed to be relocated and Shannon Wing will be demolished as part of Stage 3 - neither of these buildings is listed as items in a statutory instrument.

The relocation of Bethel House and demolition of the Shannon Wing is considered acceptable due to the fact that both buildings have had their integrity compromised and have lost their original context and setting. An archival photographic recording of Bethel House and the Shannon Wing and Interpretation Strategy for the SAH site have been prepared in accordance with the Wahroonga Estate Concept Plan approval.

5.6.2 Aboriginal heritage

An Aboriginal Cultural Heritage Survey was undertaken, accompanied by Aboriginal community representatives. Key findings and recommendations presented in the report stated that no new sites were located however a registered site is located adjacent to Coups Creek. Areas adjacent to the creekline have potential archaeological or cultural sensitivities and should remain undisturbed and undeveloped. Should these areas be encroached during the Wahroonga Estate redevelopment, further consultation must be undertaken with the local Aboriginal community groups. The Department has recommended a condition of approval to this effect.

5.7 ESD

The proponent has provided an Ecologically Sustainable Development Statement which concluded that the proposed development has the potential to achieve a minimum 4 star Green Star rating (under the Green Building Council of Australia's Green Star Healthcare V1 Design tool).

Council recommends that the proposal achieve a minimum 5 Star Green Star Rating, but preferably a 6 Star Green Star Healthcare Tool, as the current proposal does not incorporate adequate ESD principles. The PPR provides a supplementary ESD report stating that rather than addressing sustainability in construction terms, the SAH is about providing long-term sustainable healthcare and as such the project

seeks a high percentage of points within the Indoor Environment Quality category of the Green Star Healthcare Tool.

The proposal has incorporated a number of environmentally sustainable measures in the design and functionality of the building including:

- Façade systems to implement climate control technology to heat and cool the interior of the building, maximising the amount of light entering the building without compromising energy efficiency
- On-site potable cold water storage
- On-site rainwater harvesting
- Water saving conservation devices
- Efficient landscape watering system
- Provision of bicycle parking facilities

The Department considers that the response to Council's concerns and recommendations through the PPR is satisfactory. The proposed ESD measures satisfy the DGRs which request the proposal to demonstrate that it can achieve a minimum 4 star Green Star rating. Further, the Proponent's Statement of Commitments to incorporating measures that will contribute to the ESD of the proposed development.

5.8 Bushfire Protection

The premise on which the bushfire planning and development of bushfire protection measures were determined for the project, and approved by the NSW Rural Fire Service, has been based on providing maximum protection to the hospital precinct from bushfires which may occur in the Lane Cove National Park and the vegetation within the Coups Creek/Lane Cove River corridors.

The protection measures include the provision of maximum width Asset Protection Zones (APZ) to 'core hospital' uses and construction of buildings to a level which will address the potential levels of radiant heat and ember attack. Ember attack is also addressed in the provision of complying construction standards and the impact of bushfire smoke will be addressed in the provision of smoke filters on the fresh-air intakes to the air-conditioning system.

These precautionary measures have been designed to provide a safe environment and avoid the need to relocate patients, staff or visitors due to bushfire risk.

Council raised concerns in relation to bushfire risk, specifically with regard to evacuation, access and egress for emergency vehicles, construction standards, building footprints, landscaping, a fire management plan, location and design of oxygen tanks, and static water supply. A response from Australian Bushfire Protection Planners is submitted as supporting material with the PPR, adequately addressing each of Council's concerns primarily through the clarification of a number of concerns Council raised with the documentation submitted with the EA. The Proponent commits to complying with the requirements of the Bushfire Protection Assessment.

The Department considers the Proponent's response to concerns raised by Council and commitments to bushfire protection to be satisfactory.

5.9 Flora & Fauna

Cumberland Ecology was engaged to assess the potential impacts of the development on flora and fauna, and provided recommendations to facilitate the protection and management of the habitat areas in accordance with the BMP and avoid impacts on canopy trees in the general location of the new oxygen tanks.

Further correspondence from Cumberland Ecology submitted with the PPR states that a qualified Arborist would be required to assess the potential damage to existing native trees within areas on the eastern edge of the site, and to prescribe ameliorative measures as necessary to retain and protect significant trees. A condition of consent will ensure this assessment is undertaken.

Council also raised concern about impacts resulting from Asset Protection Zone requirements along the western edge of the site and the impacts of earthworks along the interface with bushland. The PPR states that a majority of APZs are already in existence and considered adequate for bushfire protection. Some minor adjustments were made to the APZ, however this will not result in removal of native trees in this particular area. The conservation value within the E2 zone will not be significantly impacted as a result of this adjustment.

The Statement of Commitments commits to complying with the Biodiversity Management Plan for the Wahroonga Estate, and locating the new oxygen tanks In Stage 1A so as to avoid removal of the existing Sydney Turpentine-Ironbark Forest trees.

The Department is satisfied that the proposed development will not cause unreasonable impacts on local flora and fauna.

5.10 Construction Management

The Proponent has committed to noise and vibration monitoring throughout demolition and construction works, as well as to the development of specific noise control measures during the design stages to ensure that noise from all new noise generating mechanical equipment meets relevant criteria.

The Proponent is also committed to preparing and submitting detailed Construction Traffic Management Plans prior to the issue of Construction Certificates for each stage, and this is reflected in the recommended conditions of approval.

The Department is satisfied that the proposed construction of the SAN upgrade will not have a detrimental impact on the surrounding local road network during its development, and that the preparation of a Noise and Vibration Management Plan, Construction Management Plan and Construction Traffic Management Plan will appropriately address the necessary safety precautions to ensure that minimal impacts are achieved during construction.

5.11 Public Interest

The proposed development will make a significant contribution to the existing medical facilities on the site, and will assist in meeting the current and future health service demands for the growing population in the region, as well as the wider community. The project will attract close to \$300 million worth of capital investment and will create approximately 1600 full time operational jobs. The Department therefore considers the proposal in the public interest.

6. CONCLUSION

The Department has assessed the EA and considered the submissions in response to the proposal. The key issues relating to the proposal include: compliance with the Wahroonga Estate Concept Plan and MD SEPP, built form and urban design, transport, open space & landscaping, amenity, heritage, ESD, bushfire protection, flora and fauna, construction management, and the public interest.

The Department considers that the proposal is an appropriate response to the existing built environment on the site and surrounding bushland character of the locality. The proposal would provide enhanced healthcare benefits to the locality and wider community, as well as additional employment opportunities.

The development is consistent with the provisions of the Wahroonga Estate Concept Plan.

The Department has reviewed the environmental assessment and duly considered advice from public authorities as well as issues raised in public submissions in accordance with Section 75I(2) of the EP&A Act. All key environmental issues associated with the proposal have been extensively assessed, and appropriate conditions are recommended.

The development is consistent with the strategic objectives for the area, the Metropolitan Plan for Sydney 2036, the draft North Subregion Draft Subregional Strategy and is generally consistent with the requirements of the relevant planning instruments, policies and objectives.

The Department is of the view that the recommended conditions and implementation of the measures detailed in the Proponent's EA and appendices, PPR and appendices and Statement of Commitments adequately mitigate the environmental impacts of the proposal.

The draft conditions have been reviewed by the Proponent and Council, with comments incorporated where appropriate.

The Department considers the site to be suitable for the proposed development and that the Project Application is in the public interest. Consequently, the Department recommends that the project be approved, subject to conditions.

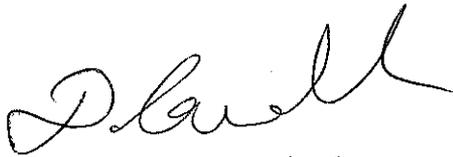
The Proponent has made a reportable political donation and accordingly, the Planning Assessment Commission will be the determining authority in accordance with current delegations.

7. RECOMMENDATION

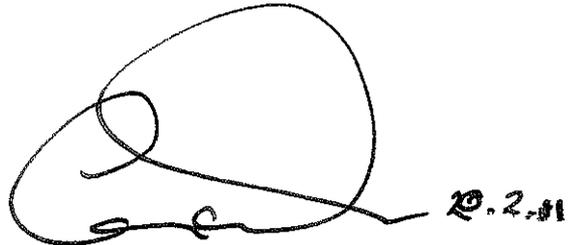
It is recommended that the Planning Assessment Commission:

- a) **Consider** the findings and recommendations of this report;
- b) **Approve** the project application, subject to conditions, under section 75J(1) of the EP&A Act, having considered all relevant matters in accordance with (a) above; and
- c) **Sign** the attached Instrument of Approval (TAG A)

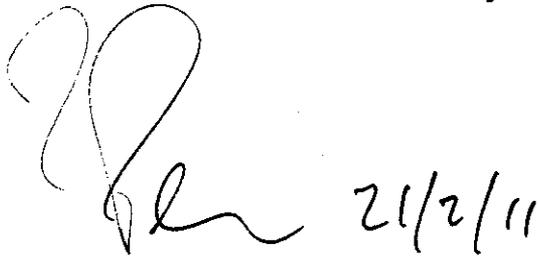
Endorsed by:



Daniel Cavallo 11/2/11
**A/Director
Government Land and Social Projects**



Chris Wilson 20.2.11
**Executive Director
Major Project Assessment**



Richard Pearson 21/2/11
**Deputy Director General
Development Assessment & Systems Performance**

APPENDIX A ENVIRONMENTAL ASSESSMENT

See the Department's website at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=3934

APPENDIX B SUBMISSIONS

See the Department's website at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=3934

APPENDIX C PROPONENT'S RESPONSE TO SUBMISSIONS

See the Department's website at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=3934

**APPENDIX D CONSIDERATION OF ENVIRONMENTAL PLANNING
INSTRUMENTS**

Environmental Planning Instruments (EPIs)

The primary controls guiding the assessment of the proposal are:

- State Environmental Planning Policy (Major Development) 2005;
- State Environmental Planning Policy No.55 Remediation of Land;
- State Environmental Planning Policy No. 33 Hazardous and Offensive Development;
- State Environmental Planning Policy (Infrastructure) 2007; and
- State Environmental Planning Policy No. 19 Bushland in Urban Areas

Other planning controls to be considered in the assessment of this proposal are:

- Ku-ring-gai Development Control Plan No 31 - Access;
- Ku-ring-gai Development Control Plan No 40 – Construction and Demolition Waste;
- Ku-ring-gai Development Control Plan No 43 – Car Parking Code; and
- Ku-ring-gai Development Control Plan No 47 – Water Management

Pursuant to Clause 5, Part 25, Schedule 3 of the MD SEPP the only environmental planning instruments that apply, according to their terms, to land within the Wahroonga Estate are:

- (a) *this Policy, and*
- (b) *all other State environmental planning policies, other than State Environmental Planning Policy No 1 – Development Standards*

The State Significant Site listing of the Wahroonga Estate under the MD SEPP introduced a comprehensive set of planning controls that will now guide future development of the site, including the Sydney Adventist Hospital. Accordingly, the Ku-ring-gai Planning Scheme Ordinance does not apply to the site.

The Department has considered the proposed project application against the objectives and aims of these instruments, and is satisfied that the proposed project is consistent with the provisions of all of these instruments. Assessment of each of these is considered as follows:

1 State Environmental Planning Policy (Major Development) 2005

The Major Development SEPP applies to the project as it specifies that development for the purpose of a Hospital with a capital investment value of more than \$15 million is a Part 3A project. The project has an estimated capital investment value of \$283.3 million, and is therefore a project to which Part 3A applies.

2 State Environmental Planning Policy No. 55 – Remediation of Land

The object of SEPP 55 is to provide for a state wide planning approach to the remediation of contaminated land. SEPP 55 requires a consent authority to consider whether the land is contaminated, and if so, whether the land will be remediated before the land is used for the intended purpose.

Stage 1 assessments previously undertaken for the site have confirmed that the site is suitable for the proposed use. Coffey Environmental prepared a geotechnical and site contamination assessment in early 2008 and Environmental Investigation Services undertook another site contamination investigation in 2009.

A Targeted Contamination Assessment was undertaken by Coffey Environmental to further satisfy Condition B13 of the Wahroonga Estate Concept Plan Approval. A report, dated 8 December 2010, discussed the detection of asbestos in shallow soil

at two sample locations in the area of the CSB expansion – Stage 1A and 1B. SAH indicated the asbestos impact could be associated with a previously demolished small structure in that area. The report recommends that asbestos impacted soils need to be appropriately managed during works so as not to pose a risk to workers, and that a qualified environmental consultant should be engaged to advise on managing the asbestos impacted soils during redevelopment.

Levels of TRH C6-C9 and BTEX compounds higher than adopted levels were detected in the well MW112 in the areas of the Shannon Ward building and car park Stage 3, and this is most likely attributable to the petrol underground storage tanks (UST) that had been previously decommissioned. WorkCover records indicate that appropriate procedures had not been conducted during the decommissioning works of these UST, and it is possible that there is residual soil contamination in this area causing groundwater contamination. The report also states that it is also possible that the groundwater was contaminated by the UST or other sources, prior to removal of the UST.

Due to the uncertainty about the extent of groundwater contamination and the evidence that the decommissioning of the two USTs may not have followed appropriate procedure, Coffey Environmental recommends an additional groundwater assessment in this area to:

- Further assess the extent of groundwater contamination in this area;
- Assess the potential for contaminated groundwater to impact the proposed construction work (design of basements to manage vapour intrusion and seepage of contaminated groundwater, treatment of dewatered contaminated water, health risks posed by contaminated groundwater to construction workers etc);
- Assess potential for contaminated water to pose a health risk to the future site occupants including the occupants at the adjacent child care centre; and
- Assess management options for the contaminated groundwater, if required.

It is also recommended that the groundwater assessment should be conducted by a suitably qualified environmental consultant.

The Department has recommended via a condition of approval, as has the Proponent through their statement of commitments, that the Proponent undertake further assessment as per the recommendations of the Targeted Contamination Assessment undertaken by Coffey Environmental, 2010.

3 State Environmental Planning Policy No. 33 – Hazardous and Offensive Development

The object of SEPP 33 is to provide a state wide planning approach to hazardous and offensive development. The Environmental Assessment provides discussion regarding the storage and management of potentially hazardous waste, and details regarding the assessment and management procedures in accordance with the provisions of SEPP 33. It is noted that the provisions of SEPP 33 do not apply to the proposed development.

4 State Environmental Planning Policy (Infrastructure) 2007

The Infrastructure SEPP aims to facilitate the effective delivery of public infrastructure across the state. Under Clause 8 of the Infrastructure SEPP, the provisions of the MD SEPP prevail to the extent of any inconsistency with the Infrastructure SEPP. As the proposal is being assessed under Part 3A, the exempt development provisions under the Infrastructure SEPP are not applicable.

5 State Environmental Planning Policy No. 19 – Bushland in Urban Areas

SEPP 19 aims to protect and preserve bushland within the urban areas. Development consent is required for any disturbance to bushland zoned or reserved for public open space.

The proposed works are setback from the established bushland, which is located within an E2 Conservation Zone under the MD SEPP. A comprehensive survey and assessment of the potential impact of the overall estate development on this bushland was undertaken as part of the assessment and approval process for the Wahroonga Estate Concept Plan. The staged alterations and additions to the SAH as proposed is consistent with the provisions of the Wahroonga Estate Concept Plan and Cumberland Ecology (who was engaged in association with the preparation of the Wahroonga Estate Concept Plan) has confirmed that the subject proposal is acceptable.

6 Ku-ring-gai Development Control Plan No 31 - Access

This DCP aims to ensure that equitable access is provided to all public buildings and spaces. The proposed development will comply with all relevant access requirements, taking into account the specific needs of patients, people with disabilities and parents with prams. An Access Report for the proposal concludes that the development will provide accessible environments for patients, residents, staff and visitors in a manner that promotes appropriate health and living outcomes consistent with Councils Access DCP 31.

7 Ku-ring-gai Development Control Plan No 40 – Construction and Demolition Waste

The demolition works to facilitate the proposed development are outlined in the Demolition Site Plan. A Waste Management Report has been prepared to outline the approach to waste minimisation and management. A Biological and Trade Waste Review was also undertaken with measures to be implemented.

8 Ku-ring-gai Development Control Plan No 43 – Car Parking Code

A comprehensive review of car parking has been undertaken as part of the Assessment of Transport, Traffic and Parking Implications report, taking into account the staging of the development and construction and operational phases. Assessment against Council's DCP was not undertaken as the criteria set out for hospitals is more relevant to smaller hospitals and not a large one as the subject proposal. Discussion regarding car parking is provided above in section 5 of this report.

9 Ku-ring-gai Development Control Plan No 47 – Water Management

An integrated water cycle management strategy, addressing the principles and requirements of on-site detention for flood control and requirements to control the rate of stormwater runoff, was adopted under the Wahroonga Estate Concept Plan Approval and in accordance with Ku-ring-gai DCP 47. A Stormwater Management Plan and Stormwater Management Report have been submitted with the subject proposal, highlighting features that will minimise flooding, provide for rainwater reuse, water quality treatment.

APPENDIX E POLITICAL DONATION DISCLOSURES

See the Department's website at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=3934

APPENDIX F RECOMMENDED CONDITIONS OF APPROVAL
