

15 December 2016

Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Attention: Fiona Gibson

Dear Fiona,

Response to Submissions – Section 75W Modification Request for
Miranda Dental Hospital (MP_11_0009 MOD 3) at 86 Kiora Road,
Miranda

I refer to the submissions received from Sutherland Council and the public in regard to the above modification application and provide the following consolidated response to all the issues raised.

Issue 1: Car Parking

Summary of Submissions:

Both Council and two (2) public submissions have raised concerns that the development is decreasing the amount of public car parking on the site to the detriment of the locality.

Response:

The revised parking provision of 38 vehicle spaces results in the reduction of 2 vehicle spaces that are allocated as a loss of one staff space and one patient/visitor space. 29 spaces are now allocated for staff and 9 spaces are allocated for patients.

The modification application is accompanied by an assessment of the reduced on-site parking provision undertaken by our traffic and transport planning consultant (refer [Appendix 1](#)). In summary, the assessment concludes

- Council's parking provisions do not take into account the fact that the subject development is very well served by public transport being located immediately adjacent to the Miranda Railway Station, Miranda bus interchange and also within an established commercial centre that has significant public parking.
- The management of the parking provision is supported by a detailed Operations Management Plan.

- Patient parking will be by reservation only.
- The loss of one staff parking space will have a positive impact on the potential for queuing to occur in Urunga Lane.
- It is intended that the Operations Management Plan will be used as the basis for parking allocation and management to encourage the parking efficiencies proposed in this modified plan.

The effectiveness of the Operations Management Plan will be reviewed periodically and adjusted as necessary to ensure optimal balance of staff and patient/visitor parking.

Issue 2: Sharing of the disabled parking space

Summary of Submissions:

Council has raised concerns about sharing of the disabled parking space with the loading bay.

Response:

Assessment of the provision of access for people with a disability at the drop-off area near the valet car parking service has been undertaken (refer [Appendix 2](#)). Note: the two car spaces in the drop off area are only for drop offs and not parking.

The assessment concludes that the drop-off area is designed to minimise the risk of a Disability Discrimination Act (DDA) complaint and in accordance with the recommendation of report, disability access as proposed will be monitored by the occupants on an ongoing basis to ensure all obligations under the DDA are met.

It should be noted that disabled persons in wheelchair being dropped off by car will always be assisted by either the driver or the on-site valet. There is a valet in the driveway to assist with disabled drop off, car lift operation and managing traffic. When a disabled person is being dropped off, the valet will put a cone or signage to stop traffic from entering the driveway. A van for wheelchair can also drop off in the driveway stopping diagonally as demonstrated in the DDA report as an alternate solution.

Issue 3: Increase in building height

Summary of Submissions:

Council has raised concerns that no justification has been provided for the increase in building height that sees the lift over run and plant room exceeding Council's 25m building height limit.

Response:

Detailed plans showing where Council's 25m-height limit intersects the rooftop louvre screened plant room accompany this submission (refer [Appendix 3](#)).

The S75W (MOD 3) application provides the following justification for the proposed increase in building height:

- The parapet height of the building is increased by 1.89m as a direct result of structural engineers detailing for beam sizes in combination with the requirements for air conditioning ducts in ceiling space.
- The maximum number of storeys applying to the proposed development at the time of the Concept approval was 28m.
- Only the roof top plant room louvre screening exceeds Council's current 25-metre building height limit by a maximum 0.47m at the northwest corner of the plant room (refer detail drawings in Appendix 3).
- The modified building height will also continue to meet the objectives of the building height standard.
- The scale of building remains compatible with adjoining development, particularly the adjoining Miranda Westfield Shopping Centre that has a maximum height limit of 30 metres;
- The scale of building is consistent with the desired scale and character of the street and locality in which the building is located and is dominated by the bulk and scale of Westfield Miranda;
- The proposed minimal increase in height will continue to allow reasonable daylight access to all buildings and the public domain;
- The proposed minimal increase in height will have minimal impacts on adjoining or nearby properties from loss of views, loss of privacy, overshadowing or visual intrusion; and
- The proposed minimal increase in height will not impact on the transition in building scale from higher intensity employment and retail centre of Miranda to surrounding residential areas.

In summary, the modified building height will continue to meet the objectives of the building height standard in Council's current Local Environmental Plan.

Issue 4: Flooding

Summary of Submissions:

Council has raised a number of concerns in relation to flooding specifically:

- Consideration be given to flows from Jackson Avenue;
- Analysis to be done assuming 50% pit blockage;
- Analysis to be done for all storms from 1 year ARI to 100 year ARI; and

- Analysis of flows at the end of Urunga Lane

Response:

The issues of concern raised by Council have been clarified and adequately addressed by our consulting engineers (refer [Appendix 4](#)).

All the issues raised by Sutherland Council and the public in regard to our request for a Section 75W modification have been adequately addressed.

If further information or clarification is required please do not hesitate to contact me directly on 0403 242 926 or email tony@polvere.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tony Polvere', with a horizontal line extending to the right.

Tony Polvere
Director