



7 April 2025  
Our ref: SSD-2/2025

Tuong Vi Doan  
Department of Planning, Housing and Infrastructure  
4 Parramatta Square  
12 Darcy Street  
Parramatta  
NSW 2150

Dear Vi Doan

### **Uniting War Memorial Hospital Site - SSD-61389706**

I write regarding public exhibition of state significant development application SSD-61389706 at the Uniting War Memorial Hospital Site.

Thank you for agreeing to an extension of the submission deadline to 14 April 2025 to enable us to provide our complete submission regarding the above application.

Prior to the provision of our complete submission, we provide a preliminary submission in this correspondence below, as requested by yourself.

Waverley Council officers have reviewed the proposal, and our preliminary position is that we object to the proposal on the following basis:

#### **1. Heritage impacts**

The proposal has unacceptable negative impacts on the heritage significance of the heritage-listed buildings at the site as follows:

- The design of Building A does not successfully respond to the character and setting of the Edina building. The proposed entrance to Building A, alongside other proposed building elements, does not align with the entrance and clock tower of the Edina building.
- The proposed full-height columns of Building G are dominant elements, which create a classical order which is at odds with the Victorian architecture of the heritage items.

#### **2. Excessive parking and associated traffic impacts**

The proposed 478 car parking spaces is excessive and will result in unacceptable impacts on local traffic and pedestrian networks. The applicant's Traffic Impacts Assessment is deficient and does not demonstrate acceptable traffic impacts.

#### **3. Exceedance of the relevant height of buildings development standard**

The applicant has not met the requirements of Waverley Local Environmental Plan 2012 (Waverley LEP 2012) clause 4.6 regarding the exceedance of the maximum building height development standard (Waverley LEP 2012 clause 6.13(4)) by Buildings B, C and D within the SP2 zone.



The applicant has not demonstrated that compliance with the development standard is unreasonable or unnecessary in the circumstances and that there are sufficient environmental planning grounds to justify the contravention of the development standard.

Specifically, the applicant has not demonstrated that there are acceptable solar access to dwellings located within the residential flat buildings on the west side of Bronte Road and that those dwellings will retain sufficient solar access. It is also unclear as to whether any views may be affected by the proposed exceedances from surrounding properties.

#### **4. Non-compliance with site-specific Waverley LEP 2012 clause 16.3**

The applicant has not demonstrated compliance with Waverley LEP 2012 clause 16.13(5)(d)(iii) as the thermal performance of Buildings A and E do not meet the requirements of a NatHERS 7 star building. The proposal cannot benefit from the alternative height of buildings and floor space ratio provisions at clause 16.13(4) unless the requirements of NatHERS 7 stars are achieved.

Please note that we are generally supportive of much of the proposal, however we object to the specific details of the proposal set out above.

Our full submission, which will include additional issues and comments, will follow this preliminary submission by 14 April 2025.

Please contact me at [david.knight@waverley.nsw.gov.au](mailto:david.knight@waverley.nsw.gov.au) or 02 9083 8762 if you have any queries regarding our submission.

Yours sincerely

A handwritten signature in black ink, appearing to read 'David Knight'.

David Knight  
Senior Development Assessment Planner  
Waverley Council