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RESEARCH STRATEGIES RESULTS

17 January 2013

Director General
Department of Planning and Infrastructure
GPO Box 39
Sydney NSW 2001
Attention: Ms Pilar Aberasturi

Dear Ms Aberasturi,

Re: Response to submission re: MP 11_0009 Mod 1 – Miranda Dental Hospital

I refer to the e-mail submission lodged by Sutherland Council dated 10/01/2013 in relation to the S75W application to modify the project approval MP 11_0009 for a dental hospital at 84-86 Kiora Road, Miranda. We provide the following response to the four (4) key areas of concern identified by Council.

1. Additional floor space

Council Comment:

The modification proposed an increase in floor space of 12% without the provision of any additional parking. The justification is that the applicant wants more space. Council remains of the view that the amount of floor space proposed on this small site in its particular location and with so little parking will generate issues in the locality in relation to parking on the street and on nearby private property, traffic at the intersections adjoining the site, and the extent of pedestrian activity given the width of the adjacent footpath. The filling in of the void space at the lower level will also detract from the amenity of the space internally, which was put forward as a positive attribute in the original proposal.

Response:

The internal changes to the void and plant room result in an increase of 226sm of floor space and an increase in Floor Space Ratio (FSR) from the approved 3.95:1 to 4.41:1.

The Department of Planning and Infrastructure has previously stated:

As numerical standards are often a crude reflection of intent, a development which departs from the standard may in some circumstances achieve the underlying purpose of the standard as much as one which complies. In many cases the variation will be numerically small, in others it may be numerically large, but nevertheless be consistent with the purpose of the standard.



The objectives of the building density clause in Sutherland Local Environmental Plan (SLEP) 2006 are as follows:

- (a) to ensure that development is in keeping with the characteristics of the site and the local area,*
- (b) to provide a degree of consistency in the bulk and scale of new buildings that relates to the context and environmental qualities of the locality,*
- (c) to minimise the impact of buildings on the amenity of adjoining residential properties,*
- (d) to ensure, where possible, that non-residential buildings in residential zones are compatible with the scale and character of residential buildings on land in those zones.*

The departure from the approved FSR in this particular circumstance is justified on the environmental planning grounds that:

- There are no changes to the scale and bulk of the building;
- There are no adverse environmental impacts from overshadowing, overlooking, etc;
- There are no changes to how the building compliments the existing streetscape and forms part of the character of the locality;
- No additional car parking is required because it is not proposed to increase the number of employees and dentists.
- The proposed modifications will provide additional facilities to service the existing employee numbers, dentists and visiting specialists.
- The site is very accessible to public transport including trains and buses.

The proposed development will be in the public interest because it is consistent with the objectives of the floor space ratio standard.

2. Roof top plant

Council Comment:

The information provided states that the plant will be setback and screened, however, no plans were provided. The roof top will be visible from the vantage points in tall buildings nearby and care needs to be taken to ensure that it is not unattractive.

Response:

The roof top plant room has been increased in overall size and height to accommodate the relocated plant equipment.

As indicated in the S75 application, the plant room is to be enclosed with



"weather proof louvres" as detailed in Architectural Drawings 2.05, 3.01, 3.02, 3.03 4.01 & 4.02 lodged with the S75W application.

Importantly, the plant room will be set back from the edges of the building and will not be generally visible from the public domain.

The enclosed plant room will not be unattractive.

3. Bicycle parking

Council Comment:

Without plans, the proposed changes are difficult to assess. Council would only be concerned that bicycle parking provided is safe and practical so that it is used.

Response:

Bicycle storage is shown on Architectural Drawing 2.01 lodged with the S75W application. The bicycle storage has been relocated from the lower ground floor to basement floor (ie in the car stacker).

As identified in the architectural plans there is a designated car stacker pallet that has a cage with bicycle racks. As with the normal car stacker the specific pallet is called up by the entry of a code or use of a specific swipe card. The bicycle is then stored in the designated stacker that can be called up again when retrieving the bicycle.

This is a safe and practical method for storing bicycles in line with the method for storing motor vehicles.

4. S94 Contributions

Council Comment:

The calculation made originally was based on the information submitted by the applicant. It is agreed that the 'cost of development' and CIV are different calculations. The new cost estimate was not provided to Council. If the Department is satisfied that it is fair and accurate, no objection is made to modifying the contribution amount in accordance with the applicable s.94A plan..

Response:

We support the comments of Council to modify the contribution amount in accordance with the cost of development as outlined in the Detailed Cost Report prepared by Washington Brown Quantity Surveyors.

The Section 94A contributions should be based on the Detailed Cost Report.



It is recognised that Sutherland Council generally supports the provision of this type of facility on the subject site. The proposed modifications will ensure that the dental hospital provides a state of the art facility that is both economically and environmentally sustainable.

We look forward to the Department's favourable consideration of the proposed modifications to the approved Miranda Dental Hospital.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Tony Polvere', located below the 'Yours sincerely,' text.

Tony Polvere
Director
Planning, Infrastructure and Development