

**JOINT REGIONAL PLANNING PANEL
HUNTER AND CENTRAL COAST**

Panel Reference	2018HCC017DA
DA Number	DA2015/10349.02
Local Government Area	Newcastle
Approved Development	Construction of two storey addition to existing hospital, including new theatres and beds
Notice of Determination	6 December 2016
Street Address	Lot 100 DP1168197 23 Merewether Street Merewether
Applicant/Owner	Woollam Constructions/Vital Healthcare Australian Property Pty Limited
Date of DA lodgement	20 March 2018
Number of Submissions	One
Recommendation	Approval
Regional Development Criteria	<p>The development is to be determined by the Joint Regional Planning Panel (JRPP) pursuant to Section 2.15 of the <i>Environmental Planning and Assessment Act 1979</i>, as the proposal involves a modification to an approved development for which the JRPP was the consent authority.</p> <p>The cost of the original development was \$9,350,000 and as the development has a capital investment value of more than \$5 million under the then Clause 6 of Schedule 4A of the <i>Environmental Planning and Assessment Act 1979</i>, 'Private Infrastructure & Community Facilities over \$5 million' as a 'health services facility', determination by the JRPP is required.</p> <p>The subject application has been lodged as a Section 4.55(1A) modification.</p>
List of All Relevant Section 4.15 (1)(a) Matters	<p>Environmental planning instruments: s4.15(1)(a)(i)</p> <ul style="list-style-type: none"> • State Environmental Planning Policy (State and Regional Development) 2011 • State Environmental Planning Policy (Infrastructure) 2007 • State Environmental Planning Policy No. 55 - Remediation of Land • State Environmental Planning Policy No. 64 - Advertising and Signage • State Environmental Planning Policy (Coastal Management)

	2018 <ul style="list-style-type: none"> Newcastle Local Environmental Plan 2012 Development Control Plan: s4.15(1)(a)(i) <ul style="list-style-type: none"> Newcastle Development Control Plan 2012 Section 94A Development Contributions Plan 2009
List all documents submitted with this report for the panel's consideration	Appendix A - Amendments to conditions of consent Appendix B - Documents submitted with the application
Report by	Newcastle City Council
Report date	17 May 2018

Summary of s4.15 matters

Have all recommendations in relation to relevant s4.15 matters been summarised in the Executive Summary of the assessment report? **Yes**

Legislative clauses requiring consent authority satisfaction

Have relevant clauses in all applicable environmental planning instruments where the consent authority must be satisfied about a particular matter been listed, and relevant recommendations summarized, in the Executive Summary of the assessment report? **No**

e.g. Clause 7 of SEPP 55 - Remediation of Land, Clause 4.6(4) of the relevant LEP

(Has been addressed in the body of the assessment report)

Clause 4.6 Exceptions to development standards

If a written request for a contravention to a development standard (clause 4.6 of the LEP) has been received, has it been attached to the assessment report? **Not Applicable**

Special Infrastructure Contributions

Does the DA require Special Infrastructure Contributions conditions? **No**

Note: Certain DAs in the Western Sydney Growth Areas Special Contributions Area may require specific Special Infrastructure Contributions (SIC) conditions

Conditions

Have draft conditions been provided to the applicant for comment? **No**

Note: in order to reduce delays in determinations, the Panel prefer that draft conditions, notwithstanding Council's recommendation, be provided to the applicant to enable any comments to be considered as part of the assessment report

ASSESSMENT REPORT AND RECOMMENDATION

EXECUTIVE SUMMARY

Development Application No.2015-10349.02 has been lodged with Council, seeking modifications to the development consent granted by Council on 6 December 2016, for:

Construction of two storey addition to existing hospital, including new theatres and beds

The proposed modification submitted by the applicant proposes to alter condition 63, which is as follows:

63. *"Should the carpark approved under DA2016/0394 not be completed prior to issue of any Occupation Certificate for this application then satisfactory alternate interim car parking arrangements shall be submitted to Council for approval prior to the issue of an Occupation Certificate for this application. Such arrangements shall not extend beyond six (6) months post Council approval."*

The proposed modification had originally also incorporated internal changes to the proposed theatres. These proposed modifications were withdrawn from the application.

The proposed modification of condition 63, as publicly notified, was as follows:

63. *"The 50 car parking spaces required under DA2016/0394 shall be completed within 8 months after the issue of any Occupation Certificate and/or occupation of the additions proposed under this application."*

The modification proposal was placed on public exhibition from 27 March 2018 to 12 April 2018, in accordance with the *Environmental Planning and Assessment Act 1979 (EP&A Act)*, *Environmental Planning and Assessment Regulation 2000 (EP&A Regulation)* and Section 8 of Newcastle Development Control Plan 2012. One submission was received during the notification period.

The key issues raised in the assessment of the Section 4.55 modification relate to the:

- Parking impacts from the proposed modification of the required parking;
- Compliance with the relevant planning controls; and
- Issues raised with the submission.

The application is recommended for approval, as the proposed modified development addresses an alternative approach to car parking provision during the construction of the site.

The development is to be determined by the Joint Regional Planning Panel (JRPP) pursuant to Section 2.15 of the *Environmental Planning and Assessment Act 1979*, as the proposal involves a modification to an approved development for which the JRPP was the consent authority.

The cost of the original development was \$9,350,000 and as the development has a capital investment value of more than \$5 million under the then Clause 6 of Schedule 4A of the *Environmental Planning and Assessment Act 1979*, 'Private Infrastructure &

Community Facilities over \$5 million as a *'health services facility'* the application is to be determined by the JRPP.

1. INTRODUCTION

This report provides a detailed overview of the modified development proposal for the construction of a two-storey addition to a hospital, including additional theatres and beds at 23 Merewether Street Merewether (ie Lingard Hospital). The development application is reported to the Hunter and Central Coast Joint Regional Planning Panel in accordance with Section 2.15 of the *Environmental Planning and Assessment Act 1979*, as the proposal involves a modification to an approved development for which the JRPP was the consent authority.

The cost of the original development was \$9,350,000 and as development that has a capital investment value of more than \$5 million under the then Clause 6 of Schedule 4A of the *Environmental Planning and Assessment Act 1979*, 'Private Infrastructure & Community Facilities over \$5 million' as a 'health services facility' the application is to be determined by the JRPP.

The original approval was determined by the JRPP on 24 November 2016 (JRPP Ref 2015HCC030 DA). Consent was issued in respect of the application on 6 December 2016.

2. SITE DESCRIPTION

The original development application involved the following properties:

- 23 Merewether Street; and
- 6 Lingard Street Merewether

The original application was amended to include only 23 Merewether Street, Merewether (see Figure 1). The car park at 6 Lingard Street was separately approved (DA2016/00394) and subsequently linked, by conditions, to this application (ie DA2015/10349). 23 Merewether Street is zoned R3 Medium Density Residential under the Newcastle Local Environmental Plan 2012 (see Figure 2).

Lingard Private Hospital currently operates on 23 Merewether Street, which is a large irregular shaped parcel of land being 1.032 hectares in area. This parcel has frontages to both Merewether Street (main frontage) and Lingard Street. The 23 Merewether Street site is adjoined to the east, north and west by predominately residential properties (involving a combination of mostly single dwellings and multi-unit dwellings, being single-storey or two-storey in height). To the south of the site is a commercial/industrial area.

The portion of the site being redeveloped by the proposal includes car parking for medical staff (ie 26 spaces), a loading area, plant, seven smaller trees and associated ground coverage. The parking area has its main access via Lingard Street.

The topography of the subject site and surrounding area is relatively flat.

Aerial Map (Figure 1)



Zoning Map (Figure 2)

The table below details the attributes that affect the subject site:

Attribute	Affected/Criteria
Land Contamination	Yes
Flood Prone Land	Yes
Bushfire Prone Land	No
Mine Subsidence District	Yes
Zoning	R3 Medium Density Residential
Height	10 Metres
Floor Space Ratio	0.9:1
Heritage Item/Heritage Conservation Area	No
Acid Sulfate Soil	Class 4

3. PROPOSAL

On 6 December 2016, conditional consent was granted to carry out the following development on the subject property:

Construction of two storey addition to existing hospital, including new theatres and beds

The approval included condition 63 as follows:

"63 All works associated with the carpark approved under DA 2016/0394 shall be completed and Final Occupation Certificate issued prior to the issue of any Occupation Certificate and/or occupation of the additions proposed under this application."

The originally submitted S4.55 application included an architectural amendment to the theatres addition. This was subsequently removed from the proposed modification.

The applicant originally requested a modification of condition 63 on the following basis:

"63. The 50 car parking spaces required under DA2016/0394 shall be completed within 8 months after the issue of any Occupation Certificate and/or occupation of the additions proposed under this application."

The applicant subsequently amended the proposed modification of condition 63, as below, which is the matter for assessment within this report:

"63. Should the carpark approved under DA2016/0394 not be completed prior to issue of any Occupation Certificate for this application then satisfactory alternate interim car parking arrangements shall be submitted to Council for approval prior to the issue of an Occupation Certificate for this application. Such arrangements shall not extend beyond six (6) months post Council approval."

Refer to **Appendix B** for a copy of the latest submission by the applicant in regard to the amended S4.55 modification.

4. PLANNING ASSESSMENT

4.1 Environmental Planning and Assessment Act 1979 (EP&A Act)

4.1.1 Section 4.5 – Joint Regional Planning Panels

The development application is reported to the Hunter and Central Coast Joint Regional Planning Panel in accordance with Section 2.15 of the *Environmental Planning and Assessment Act 1979*, as the proposal involves a modification to an approved development for which the JRPP was the consent authority.

The cost of the original development was \$9,350,000 and as development that has a capital investment value of more than \$5 million under the then Clause 6 of Schedule 4A of the *Environmental Planning and Assessment Act 1979*, 'Private Infrastructure & Community Facilities over \$5 million' as a 'health services facility', determination by the JRPP is required.

4.1.2 Section 4.15(1) Evaluation

The application has been assessed having regard to the relevant matters for consideration under the provisions of Section 4.15(1) of the *Environmental Planning and Assessment Act 1979*, as detailed hereunder.

4.1.2.1 The provisions of any environmental planning instrument

State Environmental Planning Policy (State and Regional Development) 2011

This policy sets out the functions of regional panels in determining applications for regional development. Clause 20 of the SEPP requires the Joint Regional Planning

Panel to be the determining authority for development included in Schedule 7 of State Environmental Planning Policy (State and Regional Development) 2011. This includes *'Private Infrastructure & Community Facilities over \$5 million'* as a *'health services facility'*, requiring determination by the JRPP.

The trigger for modification applications to be referred to the Hunter and Central Coast Joint Regional Planning Panel for determination is Section 2.15 of the *Environmental Planning and Assessment Act 1979*.

State Environmental Planning Policy (Infrastructure) 2007 (ISEPP)

The ISEPP was introduced to facilitate the delivery of infrastructure across the State by improving regulatory certainty and efficiency.

The proposal is permissible with consent within the R3 Medium Density Residential zone as a *'health services facility'* under Newcastle Local Environmental Plan 2012, as discussed below.

The R3 Medium Density Residential zone is a prescribed zone under Clause 57 of the ISEPP and the proposal is also permissible with consent under the provisions of Clause 57 as a *'health services facility'*.

State Environmental Planning Policy No.55 (Remediation of Land)

The modified proposal remains acceptable having regard to this policy.

Other State Environmental Planning Policies

The proposal is not contrary to the provisions of any other relevant State Environmental Planning Policies.

Regional Environmental Plan

There are no regional environmental plans that are relevant to this proposal.

Newcastle Local Environmental Plan 2012 (NLEP 2012)

Clause 1.3 – Land to which Plan applies

NLEP 2012 applies to land identified upon the *'Land Application Map'*. The subject development occurs within this area.

Clause 2.3 Land Use Table - Zoning

The site is zoned R3 Medium Density Residential under NLEP 2012. The proposed development is defined as a *'health services facility'* and is permissible with consent under NLEP 2012.

The development meets the objectives of the zone as it will provide for a diversity of activities within the zone at a scale and height which is compatible with the character of the locality. It will also not result in significant adverse impacts on the amenity of nearby existing development.

Clause 4.3 Height of Buildings

The Height of Buildings Map has a maximum height limit for the site of 10m. The original proposal was approved via a Clause 4.6 variation, allowing a height of 11.279m.

The current proposal makes no changes to the height.

Clause 4.4 Floor Space Ratio(FSR)

The maximum floor space ratio for the site is 0.9:1. The original proposal was approved via a Clause 4.6 variation, allowing a floor space ratio of 0.997:1.

The current proposal makes no changes to the FSR.

Clause 4.6 Exception to Development Standards

The proposed modifications do not further affect any development standards.

Clause 5.10 Heritage Conservation

The subject site does not include any identified heritage items, having regard to the NSW State Heritage Register and the Environmental Heritage Schedule of NLEP 2012. The site does not include an identified archaeological site and is not located within a Heritage Conservation Area.

The nearest heritage items are located at Mitchell Park, being the War Memorial, the Townson Oval Pavilion and the Junction Primary School, which are all items of local heritage significance under NLEP 2012. These items are located approximately 230 metres and 140 metres respectively from the subject site. The proposal modification will have no impacts on any of these heritage items.

Clause 6.1 Acid Sulfate Soils

The subject site is identified as containing Class 4 Acid Sulfate Soils. The proposed modifications will have no impact on acid sulfate soils.

Clause 6.2 Earthworks

The proposed modifications do not result in any additional impacts. Accordingly, it is considered that the modified proposal remains acceptable.

4.1.2.2 Provisions of any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority

There is no exhibited draft environmental planning instrument relevant to the application.

4.1.2.3 Any development control plan

The modified proposal remains acceptable having regard to the Newcastle Development Control 2012 (DCP) provisions. The main planning requirements of relevance to the modified proposal are discussed in detail below.

7.03 Traffic, Parking and Access

The development was approved on a conditional basis, effectively incorporating the linking of this DA 2015/10349 "theatre additions" to DA 2016/00394 "car park".

The car park (DA2016/00394) originally formed part of DA2015/10349 but was excised to allow its construction to commence and be completed earlier, to ensure an availability of off-street parking and to potentially minimise impacts on the hospital's operation due to the further construction.

It is advised that the Lingard Hospital, following approval of DA2015/10349, was required to provide 105 parking spaces of which 50 spaces were to be provided at 6 Lingard Street Merewether (ie under DA2016/00394).

Notably, the following conditions were imposed on the original approval in regard to car parking provisions.

- 4(A) Total number of on-site site car parking is to be a minimum of 105 spaces, including existing on-site parking, proposed new parking with the extension (excluding loading) and the new carpark approved via DA 2016/0394 and a bicycle rack with a minimum capacity of 3 bicycles and such being set out generally in accordance with minimum parking layout standards in Element 7.03 "Traffic, Parking and Access" of Newcastle Development Control Plan 2012 and applicable Australian Standards. Full details are to be included in the application for a Construction Certificate.
- 4(B) A Parking Management Plan is to be provided to Council for approval prior to the release of the Construction Certificate detailing a breakdown and the location of the allocated staff, patients and visitors car parking spaces for the whole development (including the new carpark approved via DA 2016/0394). The Plan is to also include ongoing maintenance, on-site signage and management measures, communication measures and incentives to actively encourage staff to park on-site and not in the surrounding residential streets.
- 63 All works associated with the carpark approved under DA 2016/0394 shall be completed and Final Occupation Certificate issued prior to the issue of any Occupation Certificate and/or occupation of the additions proposed under this application.
- 71 The maximum permitted total number of staff on site at one time is 114 and the maximum total number of beds is 121. This is not to increase without prior approval of Council due to the relationship of these factors with the car parking spaces required.

The 50 parking spaces addressed the net change resulting from the removal of the existing 26 space car park and the additional parking generation of the theatre additions proposed. It is noted that as soon as the theatre construction had commenced the hospital had 26 less parking spaces.

The proposed amended S4.55 modification is to alter Condition 63 as follows:

63. "Should the carpark approved under DA2016/0394 not be completed prior to issue of any Occupation Certificate for this application then satisfactory alternate interim car parking arrangements shall be submitted to Council for approval prior to the issue of an Occupation Certificate for this application. Such arrangements shall not extend beyond six (6) months post Council approval."

It is considered, following an assessment of the proposed modification of condition 63, that the following amended condition is more appropriate:

63. *All works associated with the carpark approved under DA 2016/0394 shall be completed and Final Occupation Certificate issued prior to the issue of any Occupation Certificate and/or occupation of the additions proposed under this application.*

*Should all works associated with the carpark approved under DA2016/0394 not be completed prior to issue of any Occupation Certificate for this application, then satisfactory alternative interim car parking arrangements shall be submitted to Council for assessment and, if to Council's satisfaction, a letter of approval be provided by Council prior to the issue of any Occupation Certificate and/or occupation of the additions proposed under this application. Such alternative parking arrangements are not to extend beyond **31 January 2019**.*

This revised condition 63 is preferred due to:

- i. Original Criteria - The revised condition is inclusive of the original criteria/purpose of the condition.
- ii. Satisfaction/Approval - Satisfaction within the revised condition is subject to Council's assessment (ie within the original version it is unclear).
- iii. Approval/Timing trigger - it is clear within the revised condition that a letter of approval from Council must be obtained before any occupation certificate and/or occupation of the additions can occur (ie within the original version it is unclear which occupation certificate(s) may be relevant and once the alternative parking arrangements have been '*submitted for approval*' occupation could potentially have been satisfied).
- iv. Date - To remove any doubt, a specific date is a clearer way to express the timescale. Furthermore, due to this change, a period of 7 months (instead of 6) has been provided.

An assessment of the modification raised several issues and the applicant's responses are included at **Appendix B**.

The applicant has confirmed that the Lingard Private Hospital has entered into terms with Hunter Parking and Storage at Gibson Street Newcastle West (Gibson Street) for the provision of 50 reserved car parking spaces, available at any time, for a period of six months, to be utilised for Lingard Private Hospital staff while construction of the required car park is completed. This has been submitted to constitute satisfactory alternative parking having regard to the above condition.

In the applicant's submission it is detailed that the 50 spaces will be utilised by staff on shifts between 6am to 10pm at the expense of Lingard Hospital (ie at no cost to staff). It is not intended for staff on the night shift to utilise this parking due to safety concerns and as parking is generally more available at or near Lingard Hospital at these times.

A mini-bus service will be provided by Lingard to operate a shuttle service between Gibson Street and Lingard Hospital between 6am and 10pm at the commencement and completion of shifts.

Attached at **Appendix B** is the applicant's submission regarding the spread of staffing of the Lingard Hospital and their staggered starting times. Additionally, the last column details who of these staff would utilise Gibson Street, the respective timing and associated co-ordination of the mini-bus shuttle service.

An anticipated completion date for the car park is the 4th quarter of 2018, according to the applicant.

In Council's assessment, based on the above submitted information, it is considered that the provision of these 50 spaces at Gibson Street is a reasonable alternative in this instance, subject to Council's revised version of condition 63. It is noted that, due to construction delays, leading to the car park required by condition 63 not being available, the existing on street parking situation has already been exacerbated, impacting on surrounding residents and businesses. Furthermore, the proposal is already in non-compliance with the conditions of consent. The current modification aims to address these issues by providing an alternative to required parking on a temporary basis to alleviate the impacts.

8.00 - Public Participation

The proposal was notified in accordance with this policy. The application was notified for a period of 14 days and one submission was received.

A summary of the submission received for the amended proposal is included in Section 4.1.2.8 below.

4.1.2.4 Planning agreements

No planning agreements are relevant to the proposal.

4.1.2.5 The regulations (and other plans and policies)

The modified proposal remains satisfactory having regard to the Regulations.

4.1.2.6 The likely impacts of the development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality

The modified application remains acceptable.

4.1.2.7 The suitability of the site for the development

The modified application does not change the nature of the original approval and remains acceptable.

4.1.2.8 Any submissions made in accordance with this act or the regulations

The amended application was notified in accordance to the Regulation and Newcastle DCP 2012 and one submission was received. The following issues were raised in the submission.

Objection	Comment
<p>Parking Issues: Timing of construction of carpark on 6 Lingard St (DA2016/0394).</p> <p>The proposed car park was separated from DA2015/10349 to allow immediate construction of the additional car parking.</p> <p>This did not occur and ultimately the existing</p>	<p>Agreed. The revised condition 63 is aimed at addressing these issues.</p>

carpark was removed and construction commenced on the new hospital addition with the loss of 26 spaces during construction and associated parking and traffic impacts on surrounding residential streets and was not in compliance with the conditions of consent (i.e. 4a, 4b, 4C & 63).	
Lingard Hospital should not be granted any further modifications which would result in increased parking/traffic impact.	
The original DA created an additional parking demand of 78 spaces. The on-going construction at the Lingard Hospital site further exacerbates on-street parking demand due to construction workers. The existing on-street parking demand is already extremely high due to existing businesses and use by residents. The further expansion of the hospital without the required parking would only further worsen the parking situation.	This DA resulted in an additional parking generation of 50 spaces, not 78. The overall approved development generates a total demand of 105 spaces. Concerns regarding the on-street parking are agreed and the revised condition 63 is aimed at addressing these issues.
The parking required by condition 63 (ie 50) spaces should be enforced/provided to avoid further on-street parking impacts.	Agreed.
<i>"Two significant modifications to DA2016/0394 have already been submitted significantly changing the design of the proposed carpark. DA2016/0394.02 proposes the addition of a three-storey health services facility on top of the car park, while an earlier modification added a third level to the original approved car park. Both of these modifications will significantly increase the construction timeframe and provide uncertainty of completion timing."</i>	The modifications to DA2016/0394, increasing the total parking to 129 spaces, do not preclude the completion of the required 50 parking spaces. The medical suites addition is a separate application (DA2017/1546) and will be considered by the JRPP at a later stage.
<i>"Given DA2016/0394.02 remains unapproved at this stage, and very little substantial work has been completed on the 6 Lingard St site to date, the relaxing of Condition 63 exposes the community to a risk that the required parking is not provided should the proposed three storey health services facility not be approved. At the very least it reduces the incentive to complete the required car park in a timely manner. The enforcement of Condition 63 covers these risks and incentivises the completion and provision of the 50 car parks required once the Western expansion opens (3 new operating theatres + 49 additional beds)."</i>	Assuming it is meant to reference DA2017/1546 (medical suites) as the S4.55 amendments to DA 2016/00394 are approved. The originally requested 8 month deferral of parking under condition 63 was not supported and a revised condition has been reported now to the JRPP, providing for an alternative temporary parking option.
<i>"It is worth noting that despite DA2016/0394 being approved on 21st June 2016, no construction commenced on site until well into 2017, after the approval and commencement of construction on DA2015/10349. This 6-8 months delay in commencing construction was within Lingard Hospital's control and therefore no concessions to Condition 63 should be provided."</i>	The construction timing and non-compliance with Condition 63 to date is a concern. The revised condition 63 is aimed at addressing this issue.

<p><i>"The proposed area of extension further encroaches onto the streetscape and footpath in contravention of LEP setback guidelines. In this instance it seems completely unnecessary to further encroach into the streetscape given the significant bulk impact of the existing approved footprint."</i> The proposed extensions would further reduce the ability to provide for landscaping.</p>	<p>The architectural amendments proposed have been withdrawn by the applicants.</p>
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4.1.2.9 The public interest

The modified application does not change in any substantive way the nature of the original approval and remains acceptable. It is considered that the modification of condition 63, to provide for temporary car parking arrangements, is in the public interest.

5. CONCLUSION

The proposal is considered to be acceptable against the relevant heads of consideration under Section 4.15(1) of the *Environmental Planning and Assessment Act 1979*.

6. RECOMMENDATION

- A. That the Hunter and Central Coast JRPP, as the consent authority, determine to grant a modified development consent to DA2015/10349.02 (2018HCC017DA for 'Construction of two storey addition to existing hospital, including new theatres and beds' at 23 Merewether Street Merewether, pursuant to Section 4.55 of the *Environmental Planning and Assessment Act 1979* subject to the modified condition in **Appendix A**.

APPENDIX A - Amendments to consent conditions

Amendment to Condition 63

Existing Condition:

- 63 All works associated with the carpark approved under DA 2016/0394 shall be completed and Final Occupation Certificate issued prior to the issue of any Occupation Certificate and/or occupation of the additions proposed under this application.

Proposed Condition:

63. All works associated with the carpark approved under DA 2016/0394 shall be completed and Final Occupation Certificate issued prior to the issue of any Occupation Certificate and/or occupation of the additions proposed under this application.

Should all works associated with the carpark approved under DA2016/0394 not be completed prior to issue of any Occupation Certificate for this application, then satisfactory alternative interim car parking arrangements shall be submitted to Council for assessment and, if to Council's satisfaction, a letter of approval be provided by Council prior to the issue of any Occupation Certificate and/or occupation of the additions proposed under this application. Such alternative parking arrangements are not to extend beyond **31 January 2019**.