

The SAN Day Surgery Redevelopment – Summary of Submissions

Project Application (MP 09_0199)

Issues Raised	Proponent Response
NSW Health	
<p>1 Northern Sydney Central Coast Area Health Service (NSCCAHS) is undertaking planning for a major redevelopment for mental health services on the Hornsby Ku-ring-gai Hospital campus and redevelopment of priority medical services on the hospital site.</p>	<p>Noted.</p>
<p>2 The EA does not identify the nature or volume of the work to be undertaken in the new facility. It does not make it clear whether the development represents a transfer of activity from the main hospital at Wahroonga (the plans for which also contain a day surgery unit) or an additional service. The nature of the service will have an impact on the assumptions made in relation to future surgical requirements at Hornsby Ku-ring-gai Hospital.</p>	<p>Noted.</p> <p>Hardes & Associates data projects that the SAN will experience a 68.68% increase in total patient separations between 2007/08 through to 2026/27. Further to this, it is expected that the ageing population will continue to place significant increased demand on private acute healthcare services in the SAN catchment area in the decades well beyond 2026/27.</p> <p>The SAN’s main Wahroonga campus alone is not able to meet the expected demand (due to its limited capacity), and accordingly major development of SAN owned facilities in the local catchment area (such as the proposed redevelopment of the SAN Day Surgery Hornsby and redevelopment of Dalcross Adventist Hospital) is essential to meet the projected increase in community demand for healthcare needs into the future.</p> <p>The Project Application supports the rationalising of services at the SAN’s main Wahroonga campus, where there will be opportunities for less acute services to occur in satellite facilities (such as the proposed hospital at Hornsby and Dalcross).</p> <p>The SAN support continued dialogue between NSW Health (NSCCAHS) and the Hornsby Ku-ring-gai Hospital, especially in terms of potential opportunities that may present themselves as the two campuses embark on their redevelopment projects.</p>

Issues Raised		Proponent Response
3	Errors noted within Appendix B (audit of services in public hospitals in Northern Sydney) of the SAH Social and Economic Benefits report prepared for the Wahroonga development. Omissions from the report (e.g. incorrectly noting that only one of the five public hospitals on the northern Sydney area provides day surgery) suggest that the project is meeting a major gap in the provision of public surgical services. Whilst there is growth in the private day surgery market, the information contained within the report paints an incorrect picture.	<p>The Project Application does not refer to information contained within the Part 3A project application for the Wahroonga health campus redevelopment.</p> <p>The proposed hospital responds specifically to the projected increase in demand for healthcare services over the longer term.</p>
4	No timeframes are provided in relation to the staged construction of the development. Consultation with NSCCAHS will be essential to ensure that projects across the two campuses are timed to ensure minimal disruption to the agencies and to the local community. Ensure that the operation of the Hornsby Ku-ring-gai Hospital is not affected by the SAH project.	<p>Timing for the construction program is yet to be confirmed. Works will commence within the 5 year consent time period.</p> <p>The SAN commit to continue to liaise with NSW Health (NSCCAHS) and the Hornsby Ku-ring-gai Hospital to ensure there will be minimal disruption during the construction of the hospital. This commitment has been included within the final Statement of Commitments for the project application.</p>
5	In terms of future growth potential of the Hornsby Ku-ring-gai Hospital, consultation will need to occur in relation to any impact of the SAH development on service infrastructure, such as power availability.	<p>Noted. Included within the Statement of Commitments is a requirement to consult and obtain necessary approvals from service providers, which in doing so may require the upgrade of infrastructure to accommodate the development.</p> <p>It is beyond the scope of the project to ensure that development occurring at the Hornsby Ku-ring-gai Hospital has sufficient services.</p>
6	Car parking and congestion are issues for the local community. Ensure that construction worker parking requirements are adequately addressed for the duration of the building phase.	Noted. Potential traffic and parking issues during the construction phase of the development are to be managed and addressed in accordance with a Construction Traffic Management Plan. The Statement of Commitments includes a requirement to prepare and implement a Construction Traffic Management Plan.
7	How will medical emergencies be managed at the day surgery, e.g. will patients be transferred back to the SAH in Wahroonga or across the road to Ku-ring-gai Hospital emergency department? There is no expectation at this point that Ku-ring-gai Hospital will provided either clinical or corporate support for the day surgery centre.	It is expected that the new hospital will be able to manage medical emergencies on the site. Where required, patients will be transferred to the Sydney Adventist Hospital in Wahroonga via ambulance (as is currently the case at the SAN Day Surgery Hornsby).
Hornsby Shire Council		
1	Council notes that hospitals are a permitted land use within the subject zone subject to development consent.	Noted.
2	Council supports the social benefits of providing medical support services in close proximity to Hornsby Hospital.	Noted.

Issues Raised		Proponent Response
3	The proposal raises a number of inconsistencies with the current planning provisions contained within the Hornsby Shire Local Environmental Plan 1994.	Noted. Further discussion in relation to these inconsistencies is provided at Section 2.1 of the Submissions Report.
4	The development, with a floor space ratio of 1.95:1, would result in a significant variation to the FSR development standard for the Residential AM zone (i.e. 0.4:1). Council requests that the Department be satisfied that the bulk, scale, and intensity of development would be compatible with the surrounding low density area.	Noted. Further discussion in relation to inconsistencies with the Floor Space Ratio development standard for the Residential AM Zone is provided at Section 2.1 of the Submissions Report.
5	The height of the building is 4 – 5 storeys and includes car parking areas located above ground level. Council's Medical Support DCP specifies that buildings should not exceed 3.6 metres in height where fronting Northcote Road and Balmoral Street. A 9 metre height limit applies to buildings fronting Palmerston Road. Council requests that the Department in its assessment of the proposal has regard to the existing streetscape and character of the area which comprises single and two-storey development. The Department should also ensure that the building would not unreasonably restrict sunlight or result in loss of privacy and amenity to adjacent residential properties.	<p>Noted. Further discussion in relation to inconsistencies with building heights that apply to the site is provided at Section 2.1 of the Submissions Report.</p> <p>The proposal has been designed to ensure that there will not be any adverse impacts on adjacent residential properties with respect to access to sunlight, privacy, and general levels of amenity.</p> <p>Shadow diagrams prepared in support of the project application demonstrate that all surrounding residential properties will continue to receive sunlight to levels generally consistent with what they experience today.</p> <p>Existing levels of privacy will also not be adversely affected, with a separation distance of over 20m between the site and the front boundaries of adjacent residential properties along Northcote Road and Balmoral Street. This distance alone will ensure that potential overlooking from the hospital (including outdoor terrace areas) will not unduly affect the privacy of adjacent residential properties. The retention of a large proportion of mature trees along the site's street frontages, supplemented by new planting, together with significant planting within the front gardens of adjacent residential properties and street trees will also assist with minimising potential privacy impacts. Overlooking of adjacent residential properties is further minimised through avoiding windows within the western elevation.</p>
6	The parking provision for both stages 1 and 2 exceeds Council's DCP requirements and is acceptable. Disabled parking and service vehicle provision is also acceptable for both stages. The dimensions of the parking spaces have not been shown and are required. It should be noted that "small" car parking spaces have been provided at a proportion consistent with the ratio of small cars registered in NSW. This is acceptable given that the number of parking space provided exceeds the minimum DCP requirements.	Noted.
7	The development is unlikely to result in an adverse traffic impact on the local road network. The site would generate an additional 33 trips in the am peak and 57 trips in the pm peak which is the equivalent of less than an additional vehicle a minute.	Noted.

Issues Raised		Proponent Response
	The traffic consultant has apportioned the flows to surrounding road network and demonstrated that the intersections would continue to operate at acceptable level of service and degree of saturation.	
8	<p>The matters should be addressed should the Department approve the Project Application:</p> <ol style="list-style-type: none"> 1. Driveway widths need to be specified and vertical easements provided on all driveways in accordance with AS2890.1. 2. The direction of the driveways in Balmoral Street needs to be reversed so that the exit driveway is furthest from the intersection, giving more time for exiting motorists to gauge vehicle approach speeds. 3. The dimensions of parking spaces must be shown and exclude support columns. 4. Vertical clearance for service vehicles must be 3.5 metres in accordance with AS2890.2 – Off- street commercial vehicle facilities. 	Noted. Revised plans have been prepared which include the requested additional information and reverse the direction of the driveways (see Appendix C). Further, included within the final Statement of Commitments are requirements to design and construct the layout of the car park in accordance with AS2890.1 and AS2890.2.
Sydney Water		
1	The drinking water system has sufficient capacity for the proposed development. The drinking water main available for connection is the 150mm main on the west side of Balmoral Street.	Noted.
2	The wastewater system has sufficient capacity for the proposed development. The wastewater main available for connection is the 225 mm main that transcends the three subject allotments.	Noted.
3	All customers discharging trade waste into Sydney Water's wastewater systems must have written permission from Sydney Water. The trade waste requirements help Sydney Water discharge or reuse wastewater protecting the environment and meeting regulatory requirements. Sydney Water will either issue the customer a trade waste permit or enter into a trade waste agreement. A trade waste permit must be obtained before any discharge can be made to the sewer system. The permit is also needed for site remediation purposes. Applications for a trade waste permit can be made to Sydney Water at the Section 73 Certificate application stage.	<p>Noted.</p> <p>Included within the final Statement of Commitments is a requirement to consult and obtain necessary approvals from service providers.</p>
4	Sydney water will further assess the impact of individual developments when the proponent applies for a Section 73 Certificate.	Noted.

Issues Raised		Proponent Response
		Included within the final Statement of Commitments is a requirement to consult and obtain necessary approvals from service providers.
5	The proponent must fund any adjustments needed to Sydney Water infrastructure as a result of any development. The proponent should engage a Water Servicing Coordinator to get a Section 73 Certificate and manage the servicing aspects of the development.	Noted. Included within the final Statement of Commitments is a requirement to consult and obtain necessary approvals from service providers.
Transport NSW		
1	Support the preparation and adoption of a Green Travel Plan, the planned end-of-trip facilities for cyclists at basement level and the provision of bicycle locking points to be installed adjacent to the entry of the building on Palmerston Road.	Noted.
2	Compliance with relevant parking codes to achieve consistency with the DGRs to minimise parking provision. The proposal during both stages of the development provides parking well above Hornsby DCP requirements.	Noted.
3	Bicycle locking points should be located in a visible and weather protected location and subject to casual surveillance.	Noted. Secure, covered, and visible bicycle locking points are located at basement level adjoining the lift (refer to Drawing No. A/EA-201 submitted with the original project application). Bicycle locking points are also proposed to be installed adjacent to the entry of the building on Palmerston Road. The provision of these bicycle locking points is included within the final Statement of Commitments.
4	Reference should be made to the Premier's Council for Active Living and Travel Access Guides for information on preparing and implementing Workplace Travel Plans.	Noted. Reference to the Premier's Council for Active Living and Travel Access Guides is now included within the final Statement of Commitments.
5	An additional pedestrian access point towards the north-west corner of the development to assist pedestrian and cyclist access to the site, particularly from the direction of Hornsby station.	Noted. Consideration has been given to the possibility of an additional pedestrian access point towards the north-west corner of the site. The provision of one main pedestrian access point fronting Palmerston Road is considered appropriate for the site and development, especially in terms of: <ul style="list-style-type: none"> ▪ Concentrating pedestrian activity to one central location; ▪ Minimising potential disturbance to surrounding residential dwellings; ▪ Providing a safe and secure facility; and ▪ Reinforcing the connection and linkages with the adjacent Hornsby Ku-ring-gai Hospital across Palmerston Road.

Issues Raised		Proponent Response
Roads and Traffic Authority		
1	The Traffic Report addresses the Director General's Requirements. No objection to the proposal.	Noted.
2	RTA Supports the investigation of additional pedestrian facilities in the area and the development of a Green Travel Plan for the site.	Noted.
Hornsby Sleep Disorder and Diagnostic Centre		
1	Concerned with the impact of the development on patients and services during demolition, construction, and operation.	<p>Noted. The SAN commits to consult with and implement necessary measures in order to minimise potential impacts during the construction stage and during operation of the hospital on the adjoining Sleep Disorder Clinic.</p> <p>Potential measures to minimise impacts include:</p> <ul style="list-style-type: none"> ▪ Timing bulk excavation works such that it occurs outside of the one day per week when day time diagnostic studies are undertaken at the Sleep Disorder Clinic. ▪ Undertaking an assessment of the existing Sleep Disorder Clinic's building to understand its level sound proofing. ▪ Implementing (where appropriate) physical measures within the Sleep Disorder Clinic (such as double glazing) in order to minimise noise and vibration impacts.
2	Not mentioned within the noise survey as being one of the most sensitive receivers, even though a common boundary is shared.	References to noise sensitive receivers within the Environmental Assessment – Acoustics Report prepared in support of the Project Application were in the main confined to adjacent residential dwellings, whom are most susceptible to being impacted from the proposed development in terms of noise generated during construction and operation. The revised Environmental Assessment – Acoustics Report (included at Appendix B) provides additional consideration of potential noise impacts on the Sleep Disorder Clinic. The revised Acoustic Report also includes the results of noise surveys undertaken at neighbouring properties, including the Sleep Disorder Clinic.
3	The noise loggers used for the noise survey were located on the opposite side to the Sleep Disorder and Diagnostic Centre.	Noted. Additional noise loggers have subsequently been placed on surrounding residential dwellings and on the common boundary with the Sleep Disorder Clinic. The results of which have been included within the revised Environmental Assessment – Acoustics Report at Appendix B .
4	There are no noise levels measured or referred to on Balmoral Street or on the 104/106 Balmoral Street boundary.	Noted. Additional noise loggers have subsequently been placed on surrounding residential dwellings and on the common boundary with the Sleep Disorder Clinic. The results of which have been included within the revised Environmental Assessment – Acoustics Report at Appendix B .

Issues Raised		Proponent Response
5	Whilst most diagnostic services are initiated after 1900hrs in the evening, day studies run from 0800hrs – 1600hrs at least one day per week. It will be impossible for patients to sleep with the site noise next door.	Noted. The SAN commits to consult with and implement necessary measures in order to minimise potential impacts during the construction stage and during operation of the hospital on the adjoining Sleep Disorder Clinic. Measures are proposed to be implemented in order to further minimise impacts caused during the construction of the development on day time studies undertaken at the Sleep disorder Clinic.
6	The single storey Sleep Disorder and Diagnostic Centre will be completely overshadowed by a 14.9 foot adjacent building.	Noted. There will be overshadowing caused by the proposal on this commercial premises. It is not however a residential property and accordingly does not have the same strict controls in terms of minimising overshadowing impacts. Even if the building was significantly reduced in height there would still be overshadowing of this property given its position to the south of the development site.
Surrounding Resident Submission 1		
1	Object	Noted. Without grounds to justify the objection it is not possible to provide a specific response.
Surrounding Resident Submission 2		
1	The proposed development will block morning sun, which currently provides light and warmth to our living room, main bedroom, and front yard trees and plants.	<p>Noted. The key test to establishing potential adverse overshadowing impacts is assessing overshadowing during mid winter between 9am and 3pm (in accordance with the 'rule of thumb' established in SEPP 65).</p> <p>There may potentially be reduced access to early morning sun for residential properties to the west of the site. Importantly however, for the full year all adjacent residential dwellings will continue to receive the same level of sunlight between 9am and 3pm.</p> <p>Accordingly, the proposal and its resulting built form is considered to be acceptable and will not cause undue overshadowing or solar access impacts on any adjacent residential dwelling.</p>
2	The proposed development will remove access to the north-east sea breeze which currently provides some relief on hot summer days, and freshens the environment year round.	<p>Noted. A Wind Impact Assessment was prepared by Heggies in support of the Project Application. The conclusions reached confirm that ground levels wind speed along all surrounding footpaths and public access areas within the development itself will either remain at their present levels or decrease slightly with the addition of the proposed development and its wind mitigation measures.</p> <p>Any potential reduction in winds experienced from surrounding residential dwellings as a result of the proposed development is not likely to be material.</p>
3	The AM survey (7:00am to 8:00 am) undertaken as part of the Traffic and Accessibility Impact Assessment seems to be too early.	Noted. The comprehensive Traffic and Accessibility Impact Assessment prepared by Arup and submitted in support of the Project Application has been considered by Hornsby Shire Council, NSW Transport, and the Roads and Traffic Authority to be acceptable.

Issues Raised	Proponent Response
<p>Most traffic arrives in Balmoral Street and surrounds during the following hour, as employees of the various medical businesses and kindergadens arrive for work.</p>	<p>No issues were raised within any of their submissions in relation to the methodology of the Traffic and Accessibility Impact Assessment.</p> <p>A response to this issue has also been provided by Arup, refer to Appendix D.</p>
<p>4 Traffic and parking remain as issues throughout the day until employees of the businesses start to leave at around 4:30 and parents begin to collect their children. The proposed development will increase the level of congestion, and disrupt the traffic even further.</p>	<p>Noted. The comprehensive Traffic and Accessibility Impact Assessment prepared by Arup and submitted in support of the Project Application has been considered by Hornsby Shire Council, NSW Transport, and the Roads and Traffic Authority to be acceptable. No issues raised were raised within any of their submissions in terms of the conclusions reached within the Traffic and Accessibility Impact Assessment. The development accommodates all potential parking generated by its use as a hospital on site.</p> <p>A response to this issue has also been provided by Arup, refer to Appendix D.</p>
<p>5 There are no traffic calming devices along this particular section of Balmoral Street adjoining the subject site. Statements within the Traffic Impact Assessment regarding the impact of speed humps on this section of Balmoral Street are speculative.</p>	<p>Noted. A response to this issue has been provided by Arup, refer to Appendix D.</p>
<p>6 Details relating to the amount of commercial and support services traffic that will be generated by the proposal (deliveries, waste removal, maintenance etc) is missing. Will such traffic occur at evenings and on weekends?</p>	<p>Noted.</p> <p>The internalisation of traffic movement within the main hospital building will greatly assist with minimising impacts caused by servicing vehicles. The revised Environmental Assessment – Acoustics Report at Appendix B also confirms that visitor/patient vehicles are unlikely to have a noticeable or significant impact on the acoustic amenity of neighbouring properties.</p> <p>Should the Department consider it necessary, a condition is able to be included limiting the hours in which servicing vehicles can visit the site.</p>
<p>7 There is no assessment of the traffic impacts on the area during construction.</p>	<p>Noted. Traffic impacts are to be managed as part of the construction process in accordance with a Construction Traffic Management Plan to be prepared and implemented. The final Statement of Commitments includes a requirement to prepare and implement a Construction Traffic Management Plan.</p>
<p>8 Concern with the noise impacts from the development during construction, in particular danger of hearing damage and disturbance to study.</p>	<p>Noted. Consideration of potential construction noise impacts on sensitive receivers is included within the revised Environmental Assessment – Acoustics Report at Appendix B. Whilst impacts are anticipated, the SAN commit to ensuring all reasonable and practicable measures are adopted in or to minimise disturbance. Included within the final Statement of Commitments is the requirement to prepare and implement a comprehensive site and activity-specific Construction Noise and Vibration Management Plan.</p>

Issues Raised		Proponent Response
		<p>The Management Plan will specify hours of construction, potential for limiting noisy works to when residents are less sensitive to noise (e.g. mid-morning and mid-afternoon), requirements to notify activities to surrounding residents etc.</p> <p>In addition, Heggies confirm that notwithstanding the relatively high levels of noise from construction activities, they will not pose a hearing damage risk to residents, due to the short duration for which they will occur.</p>
9	Incorrect labelling on 107 Palmerston Road.	Noted. The revised Environmental Assessment – Acoustics Report included at Appendix B includes correct labelling of surrounding residential properties.
10	The fact that air conditioning, generators etc will be in constant operation for 24 hours per day, barely 50 metres from a bedroom window, would indicate that the statement ‘minimal impact on nearby sensitive receivers’ is inadequate.	Noted. The revised Environmental Assessment – Acoustics Report included at Appendix B includes refined operational noise criteria for the nearest sensitive receivers. The SAN commit to choosing suitable plant and equipment and incorporating noise control measures during design development to ensure that the noise criteria are complied with. This requirement is included within the final Statement of Commitments.
11	No consultation was undertaken with any surrounding residents by Sydney Adventist Hospital. Residents were only made aware of the proposal following a letter sent by the Department of Planning. The statement in the Assessment Report ‘the SAN has undertaken preliminary consultation with its immediate neighbours as well as SDHS staff and users’ appears misleading.	<p>Noted.</p> <p>Preliminary consultation was undertaken with immediate neighbours (i.e. those medical uses currently operating on the subject site and medical uses adjoining the site to the south) prior to the lodgement of the Project Application.</p> <p>Surrounding residents have through the public exhibition of the Project Application had the chance to review the proposal and provide comment.</p> <p>The SAN recognises the importance of positive relationships with all stakeholders and seeks to proactively engage with them over the duration of the project. A Stakeholder Consultation Strategy will be prepared to outline how the SAN will engage in ongoing stakeholder engagement. The final Statement of Comments includes the requirement to prepare and implement a Stakeholder Consultation Strategy.</p>
12	There is a lack of visibility around the excavation and construction phases of the project such that it is not possible to understand how the physical effect of rock drilling and breaking (e.g. vibrations and shaking ground) will impact on adjacent dwellings.	Noted. Construction details are not yet known at this stage. Suitable measures will be undertaken during the construction phase of the development to ensure proposed development and construction works do not adversely impact on adjacent dwellings.
Surrounding Resident Submission 3		
1	The selection of photos included within the assessment report give a false impression that the area is predominately made up of two and three storey residential dwellings, a three storey apartment block and a three storey section of Hornsby Hospital.	The Environmental Assessment Report (EAR) aims to provide a true reflection of existing conditions on the site and surrounds. It is noted that there are single storey dwellings within the area.

Issues Raised	Proponent Response
<p>The height of the proposed development would be uncommon within the immediate local area which is predominately made up of single storey buildings.</p>	<p>The character of the area in terms of uses and built form is however considered to be varied. There are a number of buildings within the grounds of the Hornsby Ku-ring-gai Hospital that are of a similar height, bulk and scale to the proposed development. Further, redevelopment plans at the Hornsby Ku-ring-gai Hospital are also likely to involve substantial modern medical buildings.</p> <p>As noted within the EAR there are buildings in the immediate locality that are three storeys and above in height. The proposal is not considered to be inconsistent with the varied built form that is present in the locality.</p> <p>The compatibility of a new modern hospital building in the locality will also increase as redevelopment plans within the adjoining Hornsby and Ku-ring-gai Hospital are realised. The shift from older to new and improved medical facilities and modern residential buildings has already started in the area and will continue in the future as the market and health service providers take advantage of the area's proximity to a major centre, accessibility to public transport, and the clustering of medical, research, and knowledge facilities.</p> <p>Further discussion as to the acceptability of the height, bulk and scale of the proposed development is included within Section 2.1 of the Submissions Report.</p>
<p>3 The site is situated in a highly visible location. Any development on the site would draw your attention, command your view and dominate the streetscape of the local area. The size of the proposed development would tower over the streetscape and would be overly intrusive development of the site.</p>	<p>The site's location on two corners means the prominence of any redevelopment scheme on the site is going to be high. This does not however need to form a constraint to redevelopment, as the site's medical context and positioning as a gateway to the adjoining Hospital provides an opportunity for a new and modern building to be established.</p> <p>The building form generally follows the topography of the site, exploiting the fall from Palmerston Road to Balmoral Street, this 'stepping' breaks down the form of the building and reduces the height to a comparable scale in relation to the adjacent multi unit residential property to the north of the site on Northcote Road. Similarly the rooftop plant has been setback significantly from the facade line, such that it is unlikely to be perceivable from within the street.</p> <p>The proposed building setbacks, articulated façades, and materials will also deliver a built form that is consistent with the large buildings to the east (Hornsby and Ku-ring-gai Hospital) and south of the site, which is not out of character with the area.</p> <p>Further, the future form of development within the growing medical precinct will also be comparable in size and prominence to the proposed development.</p>
<p>4 The development could be made less obtrusive and the visual impact could be improved by reducing the height of the building and having setback further from the property boundary.</p>	<p>The proposal complies with the general setback requirements contained within Council's Medical Support DCP. The height of the building has been given careful consideration as part of the design process, ensuring that surrounding residential areas continue to receive an acceptable level of daylight and solar access.</p>

Issues Raised		Proponent Response
		<p>The physical separation between the site and adjacent dwellings to the north and west is significant in reducing the visual impact of the proposed development from these properties. The substantial vegetation planting along the frontage of residential properties to the west along Balmoral Street, together with the larger setback of the building to Northcote Road (over 6m) also ensures that the visual impact from the development will be minimised. Retained planting and replacement planting along the site's street frontages will also assist with softening the bulk and scale of the development and assist with ensuring the green streetscape continues around the site.</p>
5	<p>The proposed development would be out of character and unrepresentative of the majority of building heights in the immediate locality.</p>	<p>As noted within the EAR there are buildings in the immediate locality that are three storeys and above in height. The proposal is not considered to be inconsistent with the varied built form that is present in the locality. Planned residential and medical development in the area will also be comparable in height, bulk and scale to the proposed development. Further, the height of the proposed building is also considered acceptable given the site's strategic location within a major medical hub and location on the periphery of a major centre.</p>
6	<p>The height, bulk, scale of the proposal appears to be an overdevelopment of the site within the context of the locality.</p>	<p>The design of the proposal is considered to achieve a balanced development outcome, in terms of:</p> <ul style="list-style-type: none"> ▪ protecting the amenity of surrounding residential areas; ▪ maintaining the site's green street character; ▪ providing a modern, high quality medical facility that responds to the projected increase in demand for healthcare services; ▪ providing activation to the street through the introduction of a cafe; ▪ providing an outdoor environment that will meet the needs of visitors and staff; and ▪ meeting the parking needs of staff and visitors. <p>In light of the above, and given the site's context (e.g. within a regionally significant medical hub and on the fringe of a major centre), the proposal is not considered to represent an overdevelopment of the site.</p>
7	<p>Aspects of the development encroach within the 6.3m setback requirement to Northcote Road (e.g. rainwater detention, switch room and diesel generator rooms, outdoor terrace etc).</p>	<p>The Medical Support DCP prescribes a minimum setback of 6m from the primary front boundary (being Northcote Road in this instance). The main building fronting Northcote Road complies with this requirement, although it is noted that there are aspects of development that will encroach within the setback area, such as the outdoor terrace, basement parking, and plant rooms. The Medical Support DCP does allow for low scale development to encroach within a setback area where it does not compromise the amenity of adjacent properties or streetscape.</p>

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	In this regard, the proposed encroachment is considered acceptable, presenting as a single storey, being confined to only the eastern half of the site's frontage, and ensuring existing landscape vegetation along the site's frontage is in the main retained.
8	The setbacks proposed are inconsistent with other large, three storey buildings in the area and as such would adversely affect the visual impact of the area.
9	The proposed development (in particular the outdoor terrace at level 3 and recovery rooms on level 2) would result in overlooking of adjacent private open space.
10	The proposed development (in particular the outdoor terrace at level 3 and recovery rooms on level 2) would result in overlooking of adjacent private open space.
11	Has the traffic impact of the development considered other current and known proposed development in the surrounding area?
12	There are potentially unknown factors (e.g. driver behaviour) that the traffic assessment is not able to predict which may have knock on effects / impacts to traffic in the area.
13	There are no speed bumps in Balmoral Street between Burdett Street and Northcote Road.
14	The increase in traffic flows as a result of the development, coupled with the increased traffic flows due to rotational shift workers outside of the peak periods, demonstrates the over development of the site.
15	The proposed outdoor terrace will significantly increase the impact of conversational noise currently experienced.
15	There is a history of noise impacts from existing waste traffic, with activities occurring outside of allowable working hours. It is requested that sufficient measures will be in place to ensure that this will not continue to occur with increased waste disposal movements associated with the development.

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16	<p>Details of sound insulation for the diesel generator are now known. It is assumed that suitable treated will be incorporated to ensure minimal breakout noise. We occasionally experience noise from the diesel generator located at the main Hornsby hospital. Is there any possibility to relocate the diesel generator to the southern side of the building to help reduce potential impacts of noise on neighbouring properties?</p>	<p>Noted. Suitable noise insulation will be provided to the generator room in order to minimise potential impacts during its operation (which will only be during emergencies when power is down).</p> <p>The potential relocation of the generator to the southern boundary of the site can be investigated as part of the detailed design stage.</p>
17	<p>Noise associated with increased traffic flows generated from the 139 car park spaces, service vehicles, comings and goings of hospital employees working in shifts.</p>	<p>Noted.</p> <p>The revised Environmental Assessment – Acoustics Report at Appendix B confirms that visitor/patient vehicles are unlikely to have a noticeable or significant impact on the acoustic amenity of neighbouring properties.</p> <p>The internalisation of traffic movement within the main hospital building will also greatly assist with minimising impacts caused by servicing vehicles.</p> <p>Should the Department consider it necessary, a condition is able to be included limiting the hours in which servicing vehicles can visit the site.</p>
18	<p>No consultation was undertaken with any surrounding residents by Sydney Adventist Hospital. Residents were only made aware of the proposal following a letter sent by the Department of Planning.</p>	<p>Noted.</p> <p>Preliminary consultation was undertaken with immediate neighbours (i.e. those medical uses currently operating on the subject site and medical uses adjoining the site to the south) prior to the lodgement of the Project Application.</p> <p>Surrounding residents have through the public exhibition of the Project Application had the chance to review the proposal and provide comment.</p> <p>The SAN recognises the importance of positive relationships with all stakeholders and seeks to proactively engage with them over the duration of the project. A Stakeholder Consultation Strategy will be prepared to outline how the SAN will engage in ongoing stakeholder engagement. The final Statement of Comments includes the requirement to prepare and implement a Stakeholder Consultation Strategy.</p>
19	<p>The merits and benefits that a new medical facility would bring to the community are not doubted. Provided the proposed development was in compliance with the size, scale, height, density and other development requirements, it would be a development that would be embraced by the community.</p>	<p>Noted.</p> <p>Community expectations and medical trends have however significantly shifted from the days in which Council's planning controls were developed. The proposal is at the cusp in terms of providing a hospital which is commercially viable.</p> <p>The application of Council's outdated planning controls will not support the investment needed to meet the medical needs of the region's growing and ageing population.</p>

Issues Raised		Proponent Response
20	High quality health care services and facilities can be provided to the community, but it should be provided in a manner where the development fits into and compiles with requirements of the Hornsby LEP and Medical support DCP.	Noted. A modern commercially viable hospital which provides the level of care expected by today's society and complies with Council's outdated planning controls is not however achievable on the site.