



Response to Submissions

Project: Additions and Alterations to
Existing Health Services Facility
at President Private Hospital

369-381 President Ave
61-65 Hotham St,
2-4 Bidurgal St
Kirrawee NSW 2232

Client: Macquarie Health Corporation

Date: March 2022

Prepared by:

Imagescape Design Studios

Christine Kelly

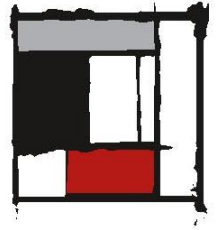
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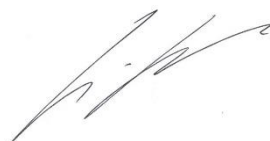


Date March 2022

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Signature



Date March 2022

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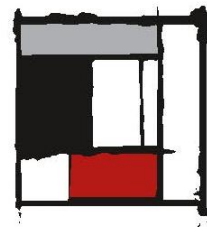


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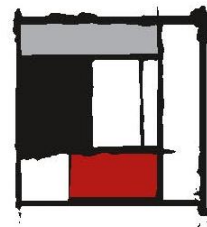
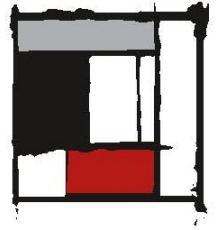


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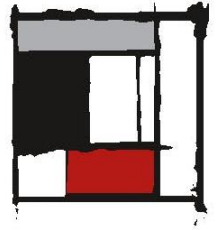
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Issue:

Issue No	Description	Issue Status
CK220218-RTS(V4)	Response to Submissions	Upload to portal dated 02/03/22
CK220114-RTS(V3)	Response to Submissions	Upload to portal dated 19/01/22



1.0 Introduction

This Response to Submissions Report has been prepared by Imagescape Design Studios to provide a response to the submissions lodged with the Department of Planning, Industry and Environment (DPIE) in relation to the public exhibition of SSD – 10320 for the Alterations and Additions to President Private Hospital. The closing date for the exhibition period was to Wednesday 3 February 2021.

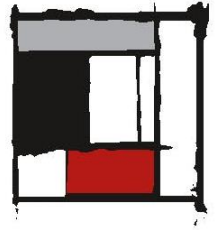
The Proponent, Macquarie Health Corporation has considered the issues raised in the submissions made during the exhibition period and has implemented various action in response to the additional information required. This report presents the following:

- A summary of the submissions received during the public exhibition period (Section 2).
- Discussion of key issues including those raised by the DPIE (Section 3).
- Responses to the issues raised in submissions (Section 4).

Proposal Overview

The Main Works SSD – 10320 DA seeks approval for:

- Additional building including a new entry and front of house facilities, 110 new surgical and rehabilitation beds, 72 new beds forming a mental health unit
- A range of outpatient services to be provided including medical, nursing, and allied health consultation
- Replacement of existing patient accommodation
- An upgrade to the hydrotherapy spaces for the inpatient and outpatient programs being offered to the public.
- A pharmacy and café
- Changes and additions to car parking
- Additional bicycle parking and end of trip facilities.



2.0 Summary of Submissions

During the public exhibition period 63 submissions were received by DPIE. A confirmation of all submissions received was downloaded from the DPIE portal (Ref: EXH-12114146_20210333IT004741.594.GMT) A description of these submissions can be summarised as follows:

- Seven (7) submissions were from Public Authorities
Two (2) authorities (TfNSW & RMS) submitted the same letter therefore only one is considered unique in this summary
- One (1) submission was from an Organisation
- Fifty-five (55) submissions were from the public
Two (2) public submissions were in support
Three (3) public submissions were identical to other public submissions
Fifty (50) unique public submissions objected to the development.

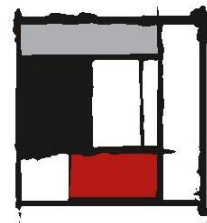
2.1 Submissions from Public Authorities

7 submissions received from public authorities:

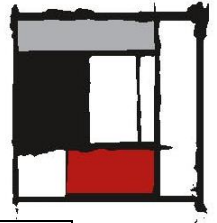
- One (1) submission received from EPA was received and did not raise any concerns for further considerations.
- Five (5) submissions made comments for further considerations.
A duplicate letter was received from Transport for NSW as well as Roads and Maritime Services. The letter received from Transport for NSW has been included as a unique response for this assessment.

Summary of the concerns raised for further consideration are documented in table 1 below.

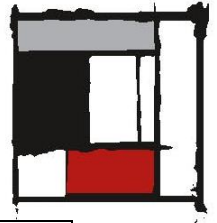
Agency	Concern	Location of response
Environment, Energy and science Group (EES)	Letter dated 22/01/21. Ref: DOC 20/1046914 Item for consideration: Flooding	The response to this item is included in Section 3.6. The additional calculations and assessments have been carried out by Martens and added to this response document. Ref. Appendix L
NSW Environmental Protection Authority (EPA)	Letter dated 16/12/2020. Ref: DOC/1032861 Item for Consideration: 'The EPA has no comments to provide for this project and no	No further action required



	follow up consultation is required.”	
Heritage Council NSW	Letter dated 15/01/21. Ref: DOC 20/ 1040333 Item for Consideration: Hotham House	The response to this item is included in Section 3.1. Additional information including the consideration for alternate for the building and reasoning why these alternate uses were not accepted. Refer Appendix E
Heritage NSW Aboriginal Cultural Heritage Regulation - South	Letter dated 03/02/21. Ref DOC20/1032683-11 Item for Consideration: ACHAR and AATR Item for Consideration: Consultation with the Registered Aboriginal Parties Item for Consideration: Cultural Heritage Management Plan	All three items for consideration are included in the reports provided by Archaeological Management Consulting Group (Appendix O) and discussed in Section 3.13. Consultation was undertaken in accordance with part 6: National parks and Wildlife Act 1974: Aboriginal Heritage Consultation Requirements for Proponents. Test excavation was undertaken in two phases. The study area was found to be absent of any Aboriginal objects and/or deposits.
Sutherland Shire Council	Letter dated 29/01/21. Ref: DN20/0063 Item for Consideration: Heritage Item for Consideration: Urban Design – Loss of ‘humble character’ Item for Consideration: Urban Design - Privacy	 The response to this item is included in Section 3.1. Additional assessment was carried out for Hotham House including the consideration of alternate uses and why these alternate uses were considered inappropriate for the development. The response to this item is included in Section 3.2 and Appendix Q. The existing locality is currently undergoing a process of redevelopment away from the ‘humble cottage’ Upon further assessment of the design and as a response to the public concern, the proposed height of the building has been reduced by 1.2m. Refer Appendix Q The response to this item is included in Section 3.4. Upon further assessment of the design changes have been made to the location of windows to ensure minimal impact on privacy. Also, roof

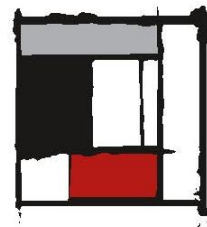


		plant areas have been moved away from adjacent properties to minimise the impact of noise. An acoustic impact report was provided in response to the SEARs requirements. This report includes the mitigating measures necessary to maximise the noise privacy for neighbouring properties.
	Item for Consideration: Urban Design – External presentation	The response to this item is included in Section 3.2. This corner is occupied by patient lounges which overlook the area and provide passive surveillance.
	Item for Consideration: Urban Design – Design considerations given to the top level of the taller buildings	The response to this item is included in Section 3.2 and 3.7 The height for the design of the building maintains an appropriate height relationship with adjacent buildings. The design was assessed by the GAO design review panel and found to be appropriate to the locality.
	Item for Consideration: Urban Design – inappropriate scale of development within a residential area	The response to this item is included in Section 3.2 and Section 3.5. The purpose designated on Council's land use maps is permitted with consent. Special consideration has been given to the areas of the proposal which adjoin these zone boundaries.
	Item for Consideration: Flood Risk	The response to this item is included in Section 3.6. The additional data requested has been carried out and supplied by Martens 9refer Appendix L and N. Martens conclude the "<i>The proposed development effectively renders the site development area flood free in all flood events up to and including the PMF.</i>"
	Item for Consideration: Trunk Stormwater Damage	The response to this item is included in Section 3.6. Further data has been carried out and is listed in Section 3.14. The data collected shows that many structures already located over the proposed easement including the Sydney Water main sewer main. The new easement location will be registered prior to any Construction Certificate for works in proximity to the easement.



	Item for Consideration: Traffic Access and car parking	The response to this item is included in Sections 3.9, 3.10, 3.11 and 3.12. Additional study was carried out by Greys in relation to the need for a slip lane. It was their recommendation that a slip lane was not required. The design team carried out further consideration and decided that whilst a slip lane would not be provided, a wider driveway could be accommodated therefore minimising the safety risk of traffic queues at the entry/exit driveways. Refer Appendix K and Ka.
	Item for Consideration: Landscaping and Tree protection	The response to this item is included in Section 3.8. The landscape documentation has been amended to reflect the trees to be retained and those planned for removal. More importantly, the landscape documentation confirms that the tree canopy is currently 10% and will grow to 50% after the landscaping works have been completed and established. Refer Appendix V.
TfNSW (RMS) Letters from both depts were identical.	Letter dated 28/01/20. Ref: SYD 19/00585/2	The response to this item is included in Sections 3.10, 3.11 and 3.12. The design has been amended to provide more detail of the end of trip facility. A preliminary Green Travel Plan has been provided by ML Traffic (Refer Appendix I. This report states "Travel plans can assist in increasing accessibility whilst reducing congestion, green house gas emissions, local air pollution and noise."
	Item for Consideration: Active Transport	
	Item for Consideration: Travel Demand Management	

Table 1: Summary of concerns from Public Authorities

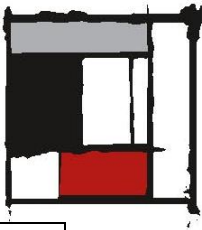


2.2 Submissions from Organisations

One (1) submission was received from an organisation, raised objections to the development in part and raised concerns and comments for further considerations.

A summary of these concerns are as follows:

Agency	Concern	Location of response
Sutherland Historical Society	This correspondence was received via email and dated 24/02/21 Item of Concern: Heritage	The response to this item is included in Section 3.1. Over the years Hotham House has been given permission to be demolished. The structure is no longer in a 'sound condition' to be reused in the development. Further studies were carried out to show how and if the existing structure could be reused within the development however none were warranted. Appendix C confirms that the structural integrity of the building is not sound and therefore would be unsafe to pursue as part of the development facilities. Appendix D outlines the substantial upgrades required to the building if it was to be used as part of the proposed development. The upgrades required would have to meet National construction upgrades as well as the numerous upgrades to meet Health Facility Guidelines. Upgrades would also be necessary to allow the building to be used for public applications with regards to electricity, water, and sewer. These upgrades were part of the considerations for reuse or adaptive reuse. Designs were carried out to investigate if and how the existing building could be reused (Refer Appendix U) and mainly due to the location and the level of the existing building, reuse was not favourable and therefore, upgrades were not warranted. <i>"The themes of agriculture, commerce leisure and society can be celebrated via many physical means such as photos, cultural fun days and the like, they do not have to be a preservation of a building structure."</i> GBA Architects have included this



		statement in their Heritage Impact Statement (Refer Appendix E) They go further to say: <i>“These claims made in reference of Hotham House however, they aren’t supported by primary source research.”</i>
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Table 2: Summary of concerns from Public Organisations

2.3 Submissions from the Public

55 submissions from members of the public, 50 unique submissions raised objections to the development in part or in whole and raised concerns or made comments for further consideration.

Submissions from the public and the topics raised in these submissions are presented in the following table with responses documented in Tables 3 and 14.

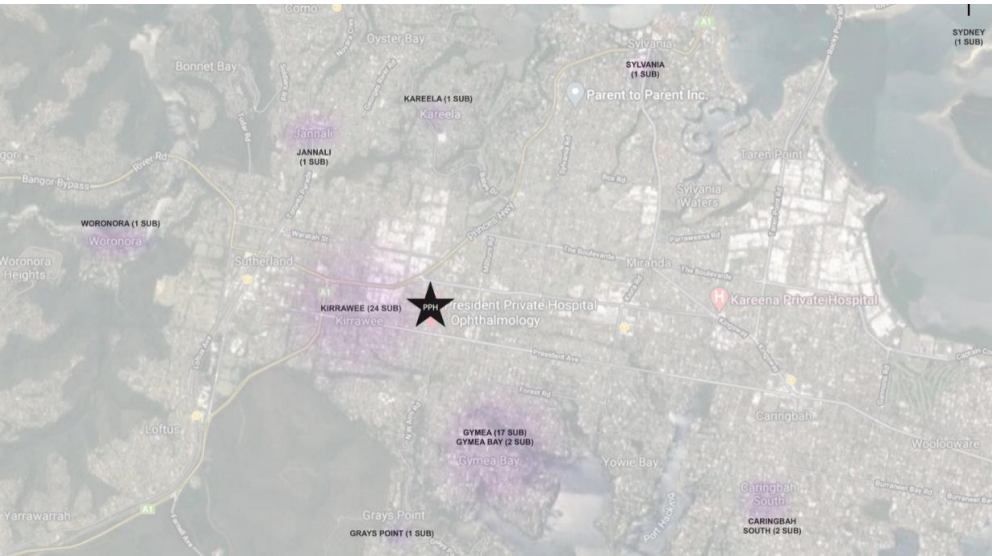
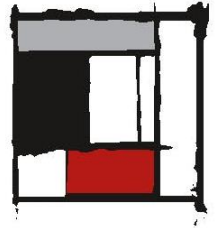


Figure 1: Graphic depiction of the wide geographic area (shown in mauve) from where submissions were received



The following table identifies the topics raised in the public submissions. A response to these topics can be found in section 4.3.

Concern	Number of times concern was raised	Location of response
Traffic	35	Section 3.9, 3.10, 3.11 and 3.12
Parking	38	Section 3.10 & 3.11
Residential Character	29	Section 3.2
Noise	24	Solutions to the questions raised by public submission were addressed in the original EIS
Heritage (Hotham House)	43	Section 3.1
Environmental Effects: Noise and Dust during construction	11	Refer to the Construction Management Plan in the EIS Section 3.2
Safety	35	Refer CPTED section in the EIS Section 3.11 & 3.12
Privacy	15	Section 3.4
Poor Communication	10	Refer to response on wayfinding and advertising in the EIS
Site Access in relation to flooding	1	Section 3.6 and 3.14

Table 3: A summary of the number of times the topic was raised in the public submissions received.

From Table 3, the most common concerns raised were heritage, safety, traffic and parking.

2.4 Submissions in support

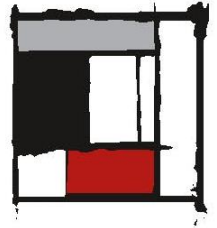
Two (2) submissions supported the proposal, one (1) provided support outright whilst the remaining one (1) provided support whilst raising items for consideration.

2.5 Identical to other public submissions.

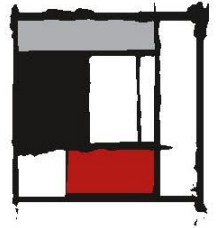
Three (3) submissions were received and were identical to other submissions.

Reference to Appendix W – Non unique public submissions confirm the following:

- The first two submissions are identical in content and appear to a duplicate upload of the same document. Therefore were counted as one unique and one non-unique submission (file names 25-Anon & 26-Anon)
- The following two submissions are identical and appear to be a duplicate upload of the same document. Therefore were counted as one unique and one non-unique submission (file names 36-Anon & 37-Anon)



- The following two submissions are identical form letters uploaded by different persons. Therefore, were counted as one unique submission and one non-unique submission. (File names 52-Vincent pt2 & 53-R Read)
- The following three submissions in this appendix file are identical form letters however two include a handwritten personal comment. All three submissions are counted as unique submissions. (File names 51-anon, 54-M Black & 55-N Olthof)



3.0 Responses to matters raised by the Department of Planning Industry and Environment

DPIE wrote to the applicant on four (4) occasions after the exhibition period closed requesting a response to the matters raised in the submissions. The DPIE also undertook an Independent Review of the flood assessment data written by Martens and submitted with the EIS. This Independent Review was carried out by GRC Hydro and was made available to the Proponent for further consideration.

DPIE undertook an assessment of the EIS and, in addition to the issues raised in submissions by the public, required that specified additional matters be addressed in more detail. This section responds to these matters identified by the DPIE.

3.1 Hotham House

Under the proposal for demolition of the locally listed heritage item being Hotham House and the surrounding gardens, the proponent is to demonstrate that

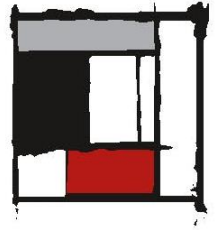
1. All options for retention and adaptive reuse have been explored
2. Can all of the significant elements of the heritage item be kept, and any new development be located elsewhere on the site
3. Is demolition essential at this time or can it be postponed in case future circumstances make its retention or conservation more feasible
4. Has advice of a heritage consultant been sought? Have the consultants' recommendations been implemented? If not, why not?

Supporting Documents:

In support of the additional assessment into the retention of Hotham House, the following documents have been provided:

- Appendix B: Ck2003306-200306-President Private Hospital_SRP03_GANSW- Advice-Additional
- Appendix C: Structural Inspection Report – by MI Engineering
- Appendix D: BCA Audit into the condition of Hotham House by Blackett, MacGuire + Goldsmith
- Appendix E: Statement of Heritage Impact – Issue D from GBA Heritage Architects
- Appendix F: 2019-12-02-pln-business-papers relevant pages
- Appendix T: Drawings prepared by Imagescape Design Studios for alternate design with Hotham House retained:

SK 001	Title Sheet
SK 025	Proposed Site Context Plan
SK 165	Basement Plan – Hotham House Retained
SK 166	Ground Floor Plan – Hotham House Retained
SK 167	First Floor Plan – Hotham House Retained



SK 300	Elevations
SK 401	Sections
SK 402	Detail Section
SK 411	Detail Section

- Appendix U Drawings prepared by Imagescape Design Studios for proposed design with partial demolition of Hotham House

SK 204	Ground Floor General Arrangement Plan
SK 205	First floor General Arrangement Plan
SK 302	Street Elevations
SK 420	Sections

The NSW Department of Planning, Industry and environment has requested the following matters in relation to Hotham House be addressed:

“Hotham House was only recently listed in Sutherland Local Environmental Plan 2015 as a local heritage item and is highly regarded by the local community. Opportunities for the inclusion / retention of Hotham House (i.e. adaptive reuse of the building) in the overall design is to be further investigated and presented demonstrating, through revised schemes, that all options have been considered.”

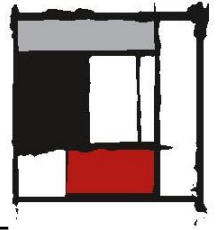
Several site planning options were considered during the concept design phase for the redevelopment of President Private Hospital. These options considered the how 61-63 Hotham Road known as Hotham House could be retained or adaptively reused. An assessment of these options follows a review of the significance of Hotham House and detail on the constraints for retention or reuse:

The Significance of Hotham House:

GBA Heritage have provided an amended Statement of Heritage Impact (refer Appendix E) In this report they have provided a thorough description of the historical significance of Hotham House has been assessed. Section 4.4 of the report addresses the Statement of Significance as contained by the Sutherland Shire Data Form.

GBA Heritage provide what they assess as a revised Statement of Significance: *“Hotham House is affine and relatively intact example of a federation bungalow, which holds aesthetic significance at a local level. Its front circular pathway and lawn contributing to its streetscape setting. It has associations with the previous Hotham Farm, one of the larger poultry farms located within Sutherland Shire.”*

A Grading of Significance has been carried out by GBA Heritage and is reproduced as follows:



GRADING OF SIGNIFICANCE	SITE ELEMENTS
EXCEPTIONAL	There are no elements of the subject site considered to be of Exceptional significance
HIGH	There are no elements of the subject site considered to be of High significance
MODERATE	- Original Federation bungalow with wrap-around verandah - Inclusive of: polychromatic brickwork, Internal timber joinery, leadlight fenestrations, fireplace surrounds and baskets, decorative fibrous plaster sheet ceilings. - Southern Billiard room addition, inclusive of: leadlight fenestrations and the remaining fireplace elements. - Circular path and sweeping entry stairs
LITTLE	- Rear lean-to, although early has reduced integrity and condition. - Cook pine, complimentary to the House setting, however not Heritage.
INTRUSIVE	Fixtures required to allow for upgrades for use as a medical facility, including fluorescent lighting, ramps, linoleum flooring, rails etc.

Table 4: Grading of Significance table taken from heritage impact Statement by GBA Heritage

From table 4 it can be seen Hotham House and surrounds is considered of moderate significance with no items deemed to be of exceptional or high significance. Intrusive items are predominately the alterations and additions made to allow the building to function as a rehabilitation centre.

Hotham House had previously been approved for demolition in 2009. Sutherland Shire Council only sought heritage listing when a development application was lodged for work including the demolition of Hotham House. After discussions with Sutherland Shire Council that development application was withdrawn by the proponent to allow for consideration of any heritage significance of Hotham House.

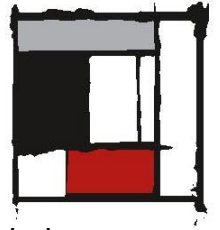
Only four (4) submissions of support for the listing from the total of fifteen (15) submissions received when public consultation was conducted for the draft amendment for Hotham House to be added to the list of Local Heritage items. Hotham House was added to the list of local heritage items late in 2019.

Mitigation measures have been suggested by GBA Heritage in the form of a Heritage Interpretation on-site, and Photographic archival recording as included in section 7.6 of their report. These mitigation measures have been incorporated into the proposal.

Constraints on Retention or Adaptive Reuse

a. Levels

President Private Hospital is being redeveloped to achieve the highest level in post operative care and rehabilitation. The difference of the floor level of the Hotham House and the existing hospital is 1.83m as seen in Fig. 2. To meet access compliance a ramp of approx. 21m would be required or an additional lift



to ensure the staff and patients could reach their destination with ease, unaided and with dignity. This height difference makes it impracticable to integrate the existing Hotham House into the redeveloped hospital.



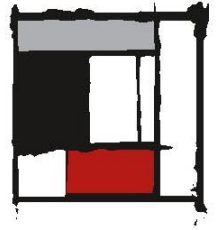
Figure 2: The critical issue of height difference between Hotham House and the main hospital being 1.83m and to Hotham Road footpath being approx. 3.2m

In addition, the footpath levels to Hotham Rd are to be adjusted as part of the site redevelopment. The footpath is lowered to the same level as the roadway for pedestrian safety. The result is Hotham House is approx. 3.2m higher than the new pedestrian footpath of Hotham Road. The design team calculated that a ramp of approx. 44m would be required to provide patients and public access from the footpath level to the main floor level. This leaves Hotham House visually and physically detached from Hotham Road.

As a result of the level differences to Hotham Rd and to the ground floor hospital level Hotham House is not suitable as an entry point for the redeveloped hospital.

b. The condition of Hotham House

MI Engineering were engaged to report on the structural condition of the building, their report (Appendix C) confirms *"The general physical condition of the structure is compromised, requiring extensive repairs and remediation to try and bring it back to its original appearance and structural soundness.....The structure appears dilapidated with limited future usage. Timber floor construction is for domestic loading, suitable for inpatient usage, however the facility should not be used for any other purpose without detailed structural investigating as it will require strengthening."*



Blackett MacGuire + Goldsmith were engaged to report on the upgrade measures required to allow the building to be integrated into the new development. Their report (Appendix D) details the following required works:-

- Fire and Smoke Compartmentation and separation
- Replacement of external doors to meet egress compliance
- All doorways will have to be widened to ensure safety distance is egress can be met as well as allow patient trolleys to move effortlessly along the corridors
- Regrading of the entire site to allow access pathways and walkways
- All glazing will have to be replaced with safety glazing
- A sprinkler system will have to be installed
- Bathroom and amenities will have to be upgraded

The report states “*Extensive and invasive internal and external alterations and additions will need to be carried out in order to cause the building to be compliant and suitable for use as an IPU facility in accordance with the Building Code of Australia or the Australian Health Facility Guidelines.*” These fire upgrade works will degrade the heritage value of the building.

Based on this expert opinion it is not considered feasible to integrate Hotham House into the redeveloped President Private Hospital.

c. Wayfinding

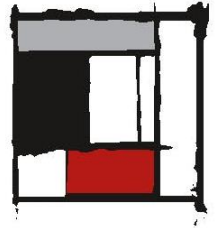
The design of the redevelopment of President Private Hospital has been based around minimising travel distances and clear wayfinding for patients, staff and visitors. Central point of entry is integral to this strategy. Retention of Hotham House at the point of entry creates visual confusion, impractical access and sub-optimal access for persons with a disability.

d. Site Access

While President Private Hospital occupies an expansive site with three street frontages the options for main vehicular and pedestrian entry is limited.

- Major entry off President Ave is restricted due to traffic and flooding issues
- Major entry off Bidurgal Ave is not possible due to conflict posed with the amenity of a quiet residential street
- Major entry off Hotham must be separated from the signalised intersection with President Ave

Consequently, the only feasible point of entry to the site is between 61 to 65 Hotham Rd. Hotham House occupies 61-63 Hotham Rd.



Options for Adaptive Reuse

Part of the design options for the development included the possibility of adapting Hotham House for another use other than part of the general hospital functions. It became evident very early on that to include the existing Hotham House to be part of the hospital building functions, the cost would be very high. Recommendations from structural engineers, Private Certifiers and Quantity Surveyors were engaged in consultation prior to finalising this decision.

Adapting the existing structure for other uses were considered. These other uses were:

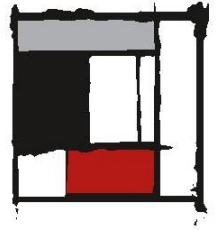
- **Café.** The current café for the hospital (located on President Ave frontage) was already considered to be located too far away from the main area of the hospital and was not commercially viable. The hospital operators did not want to repeat the same mistake with the new café and therefore located a small café in a convenient location for patients and visitors within the hospital foyer.

The Proponent, Macquarie Health Corporation, operate all food outlets in their other hospitals. This policy will extend to the redeveloped President Private Hospital. This allows efficiency in operation through the use of the central kitchen and on-site hospitality staff. It also allows Macquarie Health Corporation to maintain the standards they expect within their hospitals. The isolated location of Hotham House will not allow these efficiencies to be achieved and it is likely an outside hospitality operator would be required to run the venue.

Due to the size potential offered by Hotham House it would need to attract the general public for it to be commercially viable as a café. Its elevation above Hotham Rd however denies direct street access. Instead, access could only be via entering the hospital forecourt. Such entry is likely to discourage patronage by the general public. While access via the existing front door would be desirable this is not possible due to the restriction on street access and need to provide access to customers of all physical abilities.

If the rear lean-to section of Hotham House is demolished to allow for the entry to the hospital and excavation for basement parking the remaining structure consists of the four main rooms and billiard room. No toilet or kitchen facilities remain. To incorporate these functions into the front rooms will significantly degrade and heritage value.

The remaining frontage to Hotham Rd would not allow for any dedicated parking for the café, instead parking would be provided within the

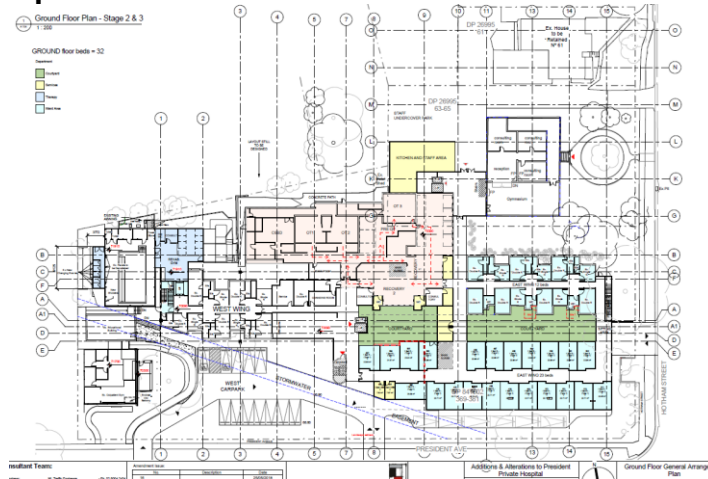


basement car park. This is likely to increase the volume of on-street parking and resulting annoyance to surrounding residential properties.

- **Administration offices.** Administration managers for the hospital confirmed that the existing location of Hotham House was inconvenient for the staff flows around the hospital. Existing staff confirmed that travel times would increase, and additional staff would be required with patient admissions.
- **GP Clinic.** The use of a GP Clinic was explored and rejected based on the following reasons:
 - Hotham House was poorly located
 - The existing structure wasn't large enough, particularly if the rear lean-to section was demolished to allow for the hospital expansion.
 - The existing location was too isolated from the main functions of the hospital to allow synergies with the operation of the hospital

Options for Retention

Option A

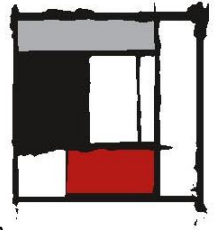


Option A provides for the partial demolition and adaptive reuse of Hotham House. The rear lean-to section is demolished, and the remainder of Hotham House is left intact. Entry to Hotham House remains from Hotham Rd and the building is not integrated into the Hospital. Separate use of Hotham House was to be determined.

The hospital main entrance located off President Ave. Access off President Ave was considered less desirable due to traffic considerations and the required separation distances to the Hotham Rd signalised intersection. Right turn into or out of the site was considered not to be achievable

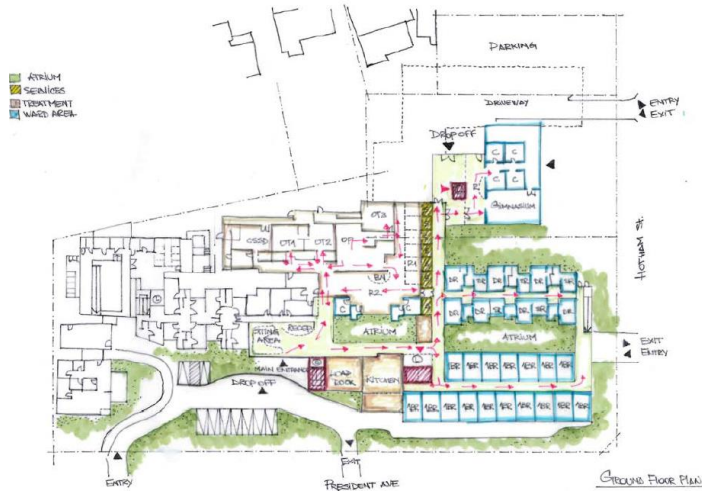
President Ave has been identified as flood affected during PMF events.

Due to flooding and traffic the option for the main hospital



entry to be from President Ave was rejected

Option B



Option B provides a minor access from President Ave and the major hospital vehicular and pedestrian entry located at No 61 Hotham Rd (to the north of Hotham House)

Hotham House is integrated into the hospital and used as administration. The new hospital entry and reception is elevated to the same level as Hotham House. Access to the hospital is via a dedicated lift between these floor levels.

This option places the hospital entry a considerable distance from the operating theatres and current hospital operations and at a higher level.

It introduces traffic movements and associated noise close to the residential properties.

It is elevated above the current hospital floor level requiring a transition in levels to be achieved which is not desirable for patient movement

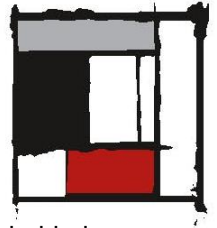
The hospital entry is not clearly defined to Hotham Rd being located behind Hotham house. This is detrimental to wayfinding.

For the above reasons option B was not considered further

Option C

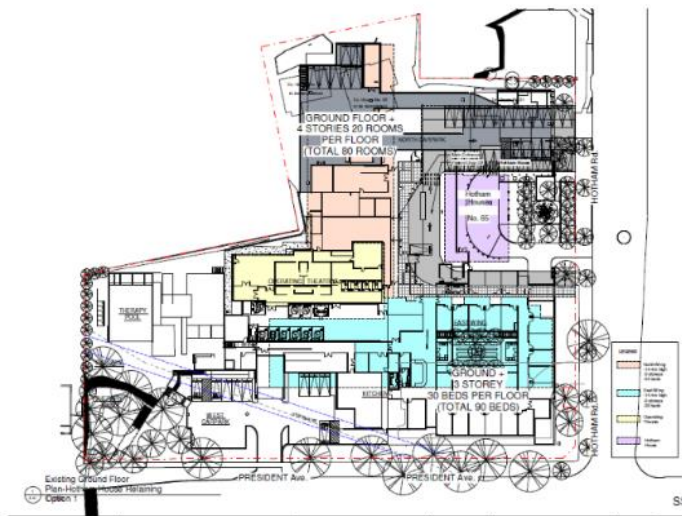
Option C retains Hotham House in full. It is disconnected from the hospital and would have a separate undefined use.

The hospital pedestrian and vehicular entry remain at the midpoint of the Hotham Rd frontage and at the same level as the current hospital floor level



The hospital entry is located behind Hotham House with an entry driveway to the south and combined entry/ exit to the north.

To accommodate the footprint of Hotham House the hospital building is displaced to the west, north and south. Excavation around Hotham House is restricted to avoid possible settlement damage as structural investigations indicate the building is not well founded. This restricts the basement levels.



Option C then was further developed with the resulting design documented on drawings included in Appendix T. Appendix R – Hotham House retention is a detailed report on the design option for the retention of Hotham House.

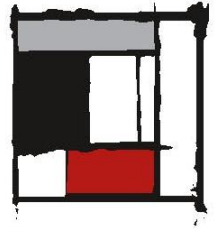
While Option C allowed the full retention of Hotham House it was not a viable option for redevelopment of President Private Hospital. This decision was based on several design criteria as follows:

a. On Site Vehicle Circulation

While the entry/exit driveway remains in the same location from Hotham Rd internal vehicular circulation is less functional due to conflict between the patient drop off point and ramp to basement level. Vehicles entering the site to drop off patients or visitors cannot now proceed direct to the basement car park. Instead, they must exit the site and then re-enter to proceed to the basement parking. This will place additional traffic movements and resulting congestion on the local road network.

On entering the basement car park vehicles must negotiate a one way only traffic movement toward President Ave due to the limited space between the operating theatres and Hotham House. This will necessitate the majority vehicles exiting to President Ave instead of Hotham Rd.

If the rear lean-to section of Hotham House was demolished it would allow additional driveway width to the basement and improve the circulation to the ground level drop-off area. This portion of the building is classified as of little significance by GBA. Its removal does remove all the existing toilets and kitchens from the building and renders it less feasible for reuse. As Hotham House is a standalone building such facilities would need to be inserted into the remaining five room building. Such is likely to be intrusive to the heritage value of the



remaining building. Further removal of the lean-to section does not assist with the other shortcomings of the design being increased impact on adjacent properties, reduced patient amenity and hospital inefficiency.

b. Impact on Adjacent Residential Properties

Retention of Hotham House necessitates moving the new hospital wings both northward and westward closer to No 59 Hotham Rd and No 6 Bidurgal Ave. Minimum 3m set back to these boundaries has been maintained but this is much less desirable urban design outcome than the minimum of 5 m and up to 13 m provided in the proposed design

c. Patient Amenity

The incorporate the entry driveway and maintain Hotham House the east wing patient courtyard is reduced from 9m to just 3m clear width under this proposal. This courtyard is surrounded by three levels of patient rooms and so is a central to the health and amenity of patients

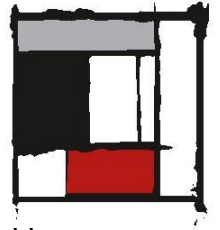
This design reduces the patient amenity through

- Reduced natural daylight to the patient rooms
- Privacy intrusion between rooms
- Removal of the herb and vegetable garden that form part of the patient rehabilitation program
- Reduction in outdoor recreation space

d. Hospital Operational Efficiency

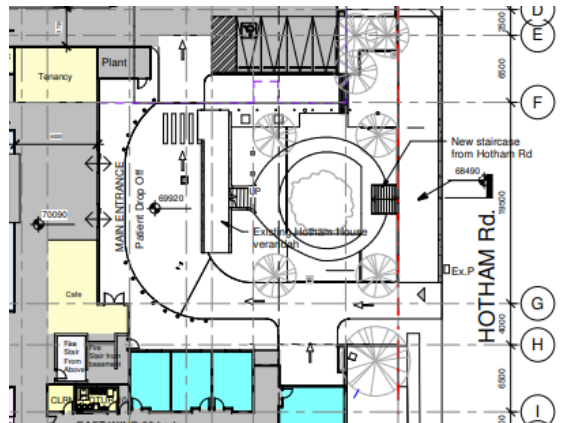
This design negatively impacts on the operation of the hospital, principally in the following areas

- The ground floor reception, administration and retail area is substantially reduced. While some function could be relocated to Hotham House this is not acceptable as they would then be physically divorced from the hospital functions. Even moving the café here is not desirable as it would then involve patients crossing the vehicular driveways, which is something to be avoided
- Patient pre-operative area is reduced in size which will reduce the comfort of patients waiting surgery. The flow from patient lifts to pre-operative and from recovery back to patient lifts giving access to patient bedrooms is constricted.
- The rehabilitation and recreation areas for the north mental health wing now look over the roof of Hotham House rather the landscaped forecourt and the comings and goings of the hospital. It is important for mental health patients to remain engaged and connected to their surrounds which is not possible with Hotham House retained
- The patient rooms to the north side of the west wing and south side of the north wing now look onto the roof of Hotham House. This is not a desirable outlook to support patient recovery.

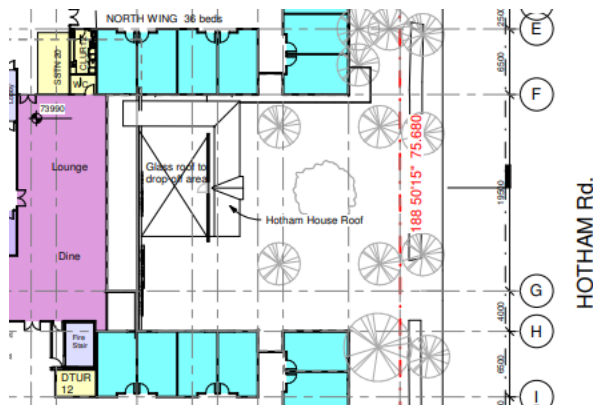


- Moving the north wing patient rooms to the north and west has resulted in longer travel distances for staff from the staff station. This will result in a lower standard of patient care and reduced supervision of at-risk mental health patients

Option D



Ground floor



First Floor

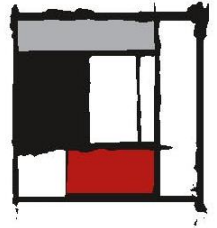
Option D calls for the substantial partial demolition of Hotham House. The result is the retention of the front verandah, the front steps, and the circular pathway. This is in keeping with the table of significance prepared by GBA listing the wrap around verandah and polychromatic brickwork being of moderate significance. The billiard room and cottage which are also of moderate significance are demolished.

The remaining structure is of no practical use other than forming an edge to the drop off area.

With the adjustment of levels for the footpath a new flight of stairs is required to give access from Hotham Rd to the circular path.

The design for redevelopment of the hospital remains as submitted.

Vehicular access was located where the billiard room is demolished. Drop-off area is behind the verandah. Pedestrian entry is under the roof of the return verandah.



The main concern with retaining any part of 63 Hotham Road is the difference in levels which are explained in detail in Figure 2 of this report. Retaining the front façade under option D does allow Hotham House to still form part of the streetscape which is familiar to local residents while negating the difference in floor levels.

Option D was not considered viable due to:

- a) It did not achieve the heritage objectives of retention as most of the building was demolished
- b) It provided a sub optimal entry to the hospital as the entry is not visible from the street, the new stairs from Hotham Rd create confusion over where the entry is, the pedestrian entry infringes on the vehicular drop off.
- c) It resulted in the landscape forecourt being cut off from the public domain due to the flight of stairs from Hotham Rd rather than being integrated into the public domain
- d) Discussion with the Government Architects Office during the design review process concluded that retaining the façade would not achieve the objectives of the heritage significance of the item. It was then concluded retention of the circular path without its reference to the entry steps was not warranted. The GA Office did advise the Hook Is Pine be retained. This has been complied with in the submitted design.
- e) Patient amenity is impacted by the roofs of Hotham House obstructing outlook to the new Hotham Park
- f) Retention of the elements of Hotham House retained under Option D could be similarly conveyed through the mitigation measures proposed by GBA in Section 7.6 of their report.

Detailed drawings for this Option D are provided in Appendix U.

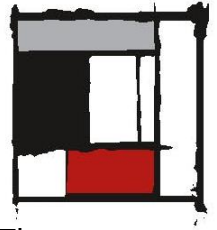
In Summary

In consideration demolition of a building or structure the following questions have been addressed.

a) Have all options for retention and adaptive re-use been explored?

Refer to options A, B, C and D of this section. These options all considered the retention and / or the adaptive re-use of Hotham House. Option C was developed in detail.

b) Can all of the significant elements of the heritage item be kept, and any new development be located elsewhere on the site?



The proposed design retains the main garden element being the Hook Pine. The circular path was removed under guidance from the Government Architects Review Panel.

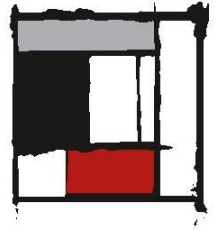
Under the guidance of GBA Heritage, all significant elements of Hotham House will be retained wherever possible as listed at mitigation measures in section 7.6 of the GBA Heritage report.

c) Is demolition essential at this time or can it be postponed in case future circumstances make its retention and conservation more feasible?

Demolition is essential at this time as Hotham House provides the 'entry' to the proposal and must be constructed as the first stage of the redevelopment

d) Has the advice of a heritage consultant been sought? Have the consultants' recommendations been implemented? If not, why not?

GBA Heritage have provided advice and consultation throughout the options and design process. Their mitigating measures included in section 7.6 of their report have been implemented into the proposal.



3.2 Urban Design

The NSW Department of Planning, Industry and environment has requested the following matters in relation to Hotham House be addressed:

“ Further justification is required to show how the proposal would provide a high level of environmental amenity for the surrounding residential properties. The Urban Design Report fails to satisfactorily demonstrate that the bulk and scale of the proposed development is sympathetic with the surrounding (predominantly one to two storey) residential character.”

The Department of Planning define Amenity as “Amenity is the pleasantness, attractiveness, desirability or utility of a place, facility, building or feature.”

Assessment of Surrounds

The proposal must be sympathetic to its surrounds whilst also allowing for change and revitalisation. The proposal has established a height strategy to remain in keeping with the various neighbouring properties. It must also be sympathetic to the mass and scale of the neighbouring properties.



Figure 3: Street elevation of President Avenue east of President Private Hospital looking north showing mix of two and three storey residential buildings



Figure 4: Street elevation of President Avenue west of President Private Hospital looking north showing predominately single story detached dwellings

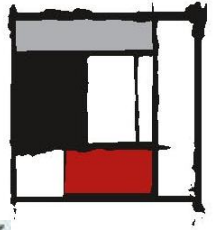


Figure 5: Corner of Hotham Road and President Avenue directly opposite President Private Hospital looking east showing single storey medical centre with multi-unit residential building behind

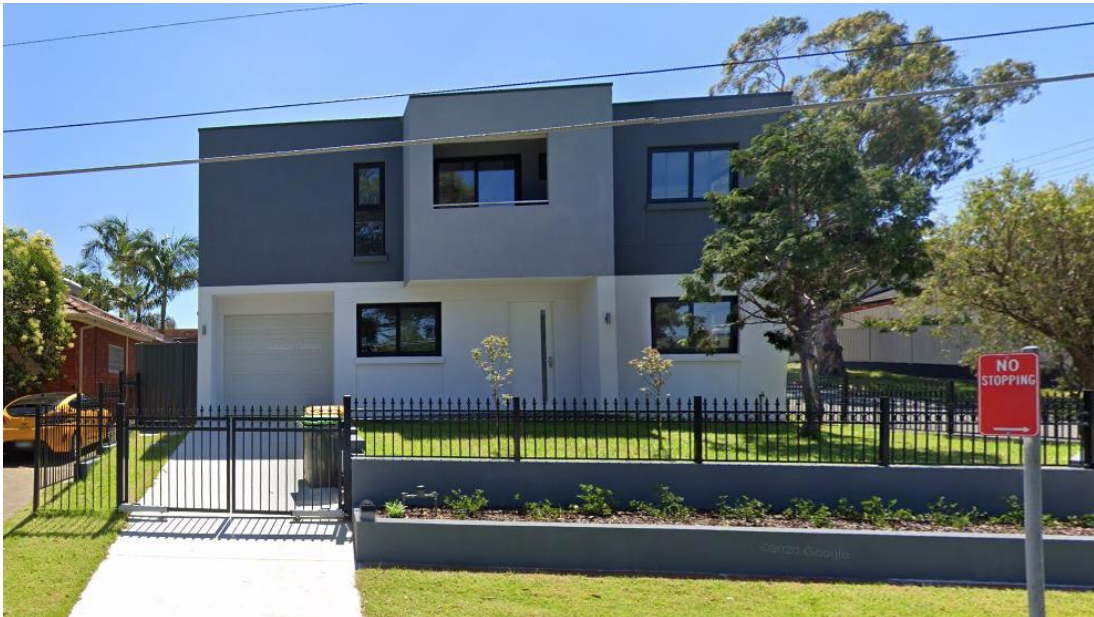


Figure 6: 59 Hotham Road immediately adjacent President Private Hospital showing two storey duplex

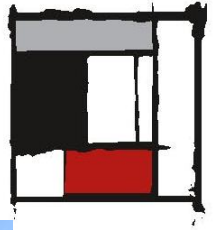


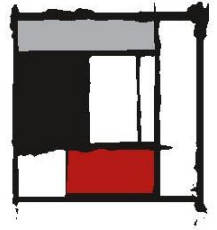
Figure 7: Hotham Road looking east directly opposite the proposed new entry to President Private Hospital showing predominately two storey multi-unit residential buildings



Figure 8: Street photo looking east along Bidurgal Ave showing the duplex at No 59 Hotham Rd



Figure 9: Street photos of 4 and 6 Bidurgal Ave. No 4 is to be demolished for the redevelopment No 6 will be adjacent to the new north wing. No 2 (not shown) is a two-storey brick house to be demolished.



Bulk and scale:

Height

The photos shown in Figures 3 to 9 show that the surrounding residential and commercial developments are a mixture of single, double, and newer three storey buildings.

This development is a combination of 1, 2, 3 and 4 storey in height to reflect the surrounds. Along Bidurgal Ave where adjacent the older residential cottages the building presents a 2-storey street façade to reflect the recently constructed duplex at the corner of Hotham Rd and Bidurgal Ave. Where the proposed development abuts the single storey cottages to the west along President Ave its height is reduced to single storey. The proposal only increases to its maximum height within the SP1 zone at the busy corner of President Ave and Hotham Rd where they are no adjacent single residences. This complements the recently constructed multi-unit residential buildings along President Ave in the R3 zone (refer fig 3).

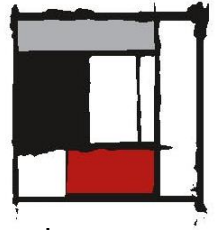
Massing

The surrounding buildings are predominately older, residential in character with smaller windows and pitched tiled roofs. The newer buildings, such as No 59 Hotham Rd (fig 6 & fig. 8), have flat or low-pitched roofs, square proportions, and more expansive fenestration.

The proposal follows the massing of the more recent buildings in the area and avoids long uninteresting facades through a combination of mix of finishes, fenestration and stepping of the façade. The base of the building is in a dark solid face brick. This contrasts with the lighter grey and off-white panelling above. The internal corridors are reflected on the external façade via vertical glass slits. This gives an insight into the building arrangement while visually reducing the building mass into distinct blocks. These blocks are then unified by a combination of single and double window fenestration patterns.

Where the proposed building is adjacent the existing single traditional cottages to the west along President Ave the existing hydrotherapy pool has been retained with its pitched roof and low scale character.

Along Bidurgal Ave the building presents a double fronted two storey façade to the street. The proposed building here is face brick with individual residential scale windows. The patient lounge facing Bidurgal Ave have been treated as a glass enclosed veranda providing privacy to the patients while reflecting the surrounding residences.



Along Hotham Rd the two wings of the proposed hospital are clearly articulated with the entry deeply recessed between. This recess allows for the new Hotham Park fronting Hotham Rd. The southern of the two wings rises to four stories to address busy President Ave while the northern wing is stories of patient rooms with undercroft delivery and service areas. The roof top plant room has been kept to the south and set back from the main building façade to minimise its presence.

Setbacks

A minimum of 5m setback to the street frontages has been maintained to allow significant landscaping to the building frontages and to reflect the surrounding residential setbacks.

On President Ave abutting the residence to the west the existing setback of the hydrotherapy pool is maintained. This is however improved by removing the entry to hydrotherapy from within this setback. This will improve privacy for the neighbour and reduce any noise annoyance.

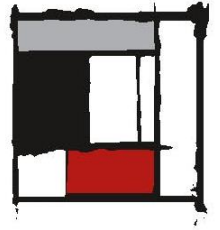
At Hotham Rd the side setback to No 59 is a minimum of 3m increasing to 7.4m where patient rooms face the property. And along Bidurgal the side setbacks are 9.5m to No 59 Hotham Rd and 10.5m to No 6 Bidurgal Ave.

In Summary:



Figure 10: South elevation of President Ave showing the relationship of the proposed hospital development to the surrounding properties

The photo montage along the President Ave streetscape looking northward is shown in Fig 10 above. This photomontage shows the southern elevation of the proposed building set in and amongst the existing structures. Here, we can see that there is a comparable structure in height and mass located at 365 President Ave. the completion of this structure can be seen in Figure 3. Beyond the immediate street elevation, we can locate the residential blocks of flats which are of similar height and bulk as the proposed development. Then as the proposed development comes close to its western neighbour, the bulk and scale of the proposed building is reduced to single storey to ensure that it is compatible with its neighbours to the west at 383 President Ave and beyond.



This proposed height of the development at this location is no different to the existing height of the building as seen in figure 4.



Figure 11: 3D wire diagram of corner of Hotham Road and Bidurgal Ave showing No 59 Hotham Rd in the foreground with the hospital redevelopment adjacent and then the single storey residences beyond along Bidurgal Ave



Figure 12: 3D wire diagram looking east along Bidurgal Ave with the houses at 6,8 a& 10 Bidurgal Ave in the foreground and No 59 Hotham Rd in the background.

The 3D wire diagram in Fig. 11 above shows the proportion of the proposed building with the structures on Bidurgal Ave. The hatched area is the corner of the proposed building. The two, two-storey blocks shown in the forefront of this diagram is 59 Hotham Road, shown in detail in figure 8. The two-storey mental health ward returns its orientation to Hotham Road and as seen in this diagram is of a similar scale to 59 Hotham. The natural ground level then rises to the house at No 6 and No 8 Bidurgal where the street levels out.

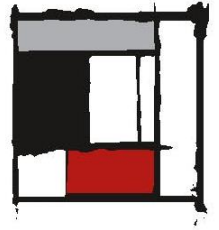
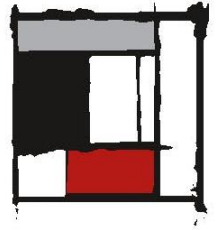


Fig. 12 shows the view looking east along Bidurgal Ave. Here we can see that the scale of the proposed building is comparable to the neighbouring resident structures. Due to the proximity of the proposed building to its residential neighbours, the extent of materials which address the Bidurgal Ave residents, has been broken down into narrower components to ensure that the proportion of components are comparable with the existing residential structures.

The DPIE also noted the following:

"The urban design report inaccuracy describes the proposed development as 2 stories please update for accuracy."

The Urban Design Report (Appendix Q) has been amended and attached to this submission.



3.3 Light Spill

The NSW Department of Planning, Industry and Environment has requested the following matters in relation to Light Spill be addressed:

“ Expected light spill impacts on residential properties adjoining the northern boundary of the hospital site are to be further addressed. The use of trees to block light spill isn’t considered a satisfactory resolution, especially when the hospital is proposed to operate 24 hours a day, seven days a week. It is therefore requested that a more acceptable resolution of light spill is provided.”

Light spill is when light falls outside the object to be illuminated. Further assessment to response to this concern are included below.

Supporting Documents:

The following documents have been provided with this submission in support of the additional assessment carried out by the design team:

- SYD20216 Electrical design Intent Statement (Appendix G) by Erbas Pty Ltd
- Architectural drawing: A 020 North Line of Site Diagrams
- Architectural drawing: A 021 West Line of site Diagrams

Room orientation:

In the majority of cases the patient rooms lining the western boundary and overlooking No. 6 Bidurgal Ave and 59 Hotham Road are orientated away from the neighbouring property windows located. This will ensure that Hospital rooms aren’t oriented to look directly to habitable spaces of their neighbours’ homes.

Louvres:

Louvres have also been located in various locations throughout the Hospital to provide the following:

- A reduced amount of light spill from the Hospital spaces to the neighbouring properties.
- An increased quality of privacy to and from neighbouring properties
- Increased solar shading to improve internal conditions, while reducing cooler loads and minimising energy costs.
- An added design aesthetic element to the hospital’s façade.

The style of louvres selected is a trapezoidal configuration made from extruded aluminium and finished in a powdercoat finish. In summary, Louvres have been added to the windows in these elevations to control light spill rather than reliance on trees.

A graphic comparison of external light spill can be seen in drawings A058 Existing Light Spill and drawing A060 proposed Light Spill. Both drawings show the location of the light source and the likely light spill created by the light source. The assessment shows that there is an unlikely change along President Ave and Hotham Road due to the effect of the powerful streetlights already in place. The greatest effective change in light spillage is to the car park off President Ave which has a minimal effect on residents as it is already well light. Also the entry driveways and garden of Hotham Road. A higher level of light spillage is likely in this area to ensure that the way finding for the facility is established. It also tends to be well lit at night to ensure covert security measures can remain in place. Mitigating measures to ensure that lighting levels are not obtrusive to neighbours across Hotham Road will be to:

- [illegible]

Figure 13: Graphic representation of the existing light spill study

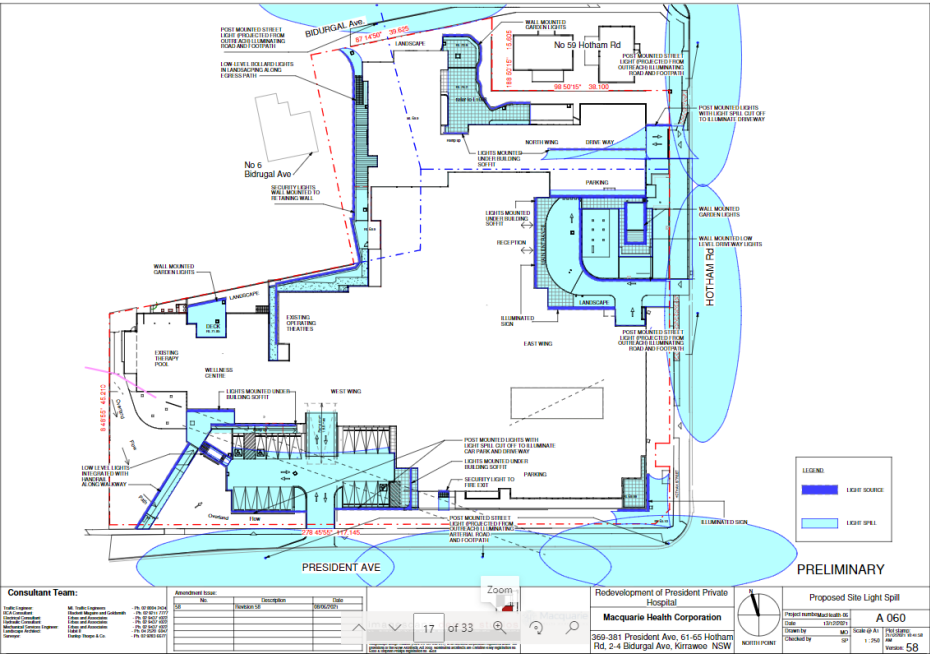
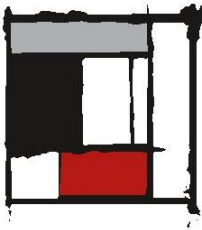


Figure 14: Graphic representation of the proposed light spill study

Other matters taken into consideration are as follows:

a. Selection of Light Fittings:

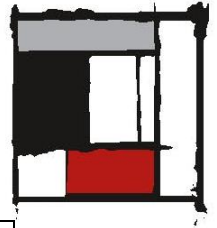
Minimisation of any direct light spill requires selection of luminaires that essentially have a horizontal front glass face when aimed and fixed in position. Lighting selection and location has not been carried out for the project at this stage. The final selection for internal and external lighting will be made in accordance with AS/NZS 1680.5:2012 Australian and New Zealand Interior and workplace lighting, part 5: outdoor workplace lighting. The proposed works are also designed in accordance with AS 4282 – 1997 Control of the obtrusive effects of outdoor lighting.

b. Design Intent Statement

A design intent statement from the Electrical Engineers (Refer Appendix G) is provided with this submission.

c. Consideration of Criteria from AS4282-1997

Criteria from AS 4282 - 1997	Proposal response
(a) The level of lighting existing in the area	The lighting in the existing area is mainly light spill from residents as well as street lighting. The street lighting located along President Ave is a high level and bright streetlight whilst the lights located along Hotham Road, and Bidural Ave are very ambient. The lighting proposed will not reduce the level of lighting any lower than what it



	already is. Further it will aim to reduce the extent of light spill from the hospital to the surrounding neighbourhood.
(b) The times that the proposed lighting is to operate	The majority of light fixtures will be on time sensors to assist with light spill to neighbours but also to assist with environmental responsibility. The public spaces located along Bidurgal Avenue will not be used in the evenings and at night therefore minimising the impact of light spill to the adjacent properties on Bidurgal Avenue.
(c) The type of lighting technology available to light the activity	Light fixtures will be selected based on environmentally responsible technology to include assistance such as time sensors, movement sensors, internal space sensors.
(d) The use of readily available and easily understood technical data on the lighting installations which can easily be verified at the design and assessment stages	Practical operations and maintenance will also be considered during the selections of light fittings to ensure that the end user feels comfortable and in control of the technology and equipment being provided.
(e) The data contained in the experimental survey and analytical studies into obtrusive light which are summarized in Appendix C	This data shall be assessed at the time of selections of fixtures and fittings.

Table 5: Response to Criteria from AS 4282 – 1997



3.4 Privacy

The NSW Department of Planning, Industry and environment has requested the following matters in relation to Privacy be addressed:

"Details of privacy shall be provided in relation to windows overlooking the private gardens of adjoining residential properties, such as frosted or highlight windows, thereby maintaining natural light to hospital rooms whilst protecting the privacy of neighbouring properties."

Response:

The main neighbouring properties of concern in regard to privacy are No 59 Hotham Road and No 6 Bidurgal Avenue. The objectives of visual and acoustic privacy set down in the Sutherland Shire DCP have been assessed for both properties as well as further examination.

Supporting Documents:

The following documents have been provided with this submission in support of the additional assessment carried out by the design team:

- Architectural drawing: A 020 North Line of Site Diagrams
- Architectural drawing: A 021 West Line of Site Diagrams

Objectives of Visual and Acoustic Privacy as shown in the Sutherland Shire DCP 2015. Chapter 2: Dwelling Houses- R2 Low Density Residential Zone	No 59 Hotham Road	No 6 Bidurgal Ave
1. Ensure a high level of amenity by protecting the acoustic and visual privacy of occupants within dwellings and their associated private open spaces.	The private open spaces are located on the opposite side in one instance and in the middle of the two buildings on the other (these are shown cross hatched in the figures provided). The private open space therefore has a minimal chance of being impacted by Hospital light spillage and privacy.	The private open space in this property is located on the other side of a single storey garage. It therefore has a minimal chance of being impacted on hospital light spillage and privacy.
2. Ensure dwellings are sited and designed so that visual and acoustic privacy and vibration from outside sources is controlled to acceptable levels, incorporating architectural and building elements to assist in protecting privacy.	The windows along the northern wing have been located to ensure that they are not placed directly in front of a habitable room, therefore minimising visual privacy. Vibration generated by air conditioning units are located well away from this property therefore minimising the impact of vibration.	The windows along the western façade have been changed in size to ensure that visual privacy can be maintained to its neighbour. Vibration generated by air conditioning units are located well away from this property therefore minimising the impact of vibration.
3. Minimise direct overlooking of windows and private open space so that the amenity of	Refer response to item 2	Refer response to item 2



neighbours and intended occupants is respected.		
4. Recognise the outlook and views from principal rooms and private open space without compromising visual privacy of others.	The main rooms in this property overlook either Hotham Road or Bidurgal Avenue, they do not look at the hospital site and therefore their visual privacy is not compromised.	The main rooms in this property overlook Bidurgal Ave and therefore their visual privacy is not compromised.

Table 6: Summary of how privacy is considered for immediate neighbours

To provide further guidance in relation to providing privacy to neighbouring areas, the design team consulted SEPP 65: Apartment Design Guide (July 2015) . This document states the following:

“Visual privacy allows residents within an apartment development and on adjacent properties to use their private spaces without being overlooked. It balances the need for views and outlook with the need for privacy. In higher density developments it also assists to increase overall amenity.Degrees of privacy are also influenced by a number of factors including the activities of each of the spaces where overlooking may occur, the times and frequency these spaces may occur , the times the frequency these spaces are being used, the expectations of the occupants for privacy and their ability to control overlooking with screening devices.”

The obvious design decision to achieve privacy amenity is to ensure that setbacks from the existing neighbouring buildings are adequate. Objective 3F-1 of the SEPP states:

“Adequate building separation distances are shared equitably between neighbouring sites, to achieve reasonable levels of external and internal privacy.”

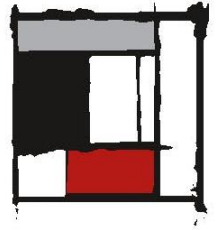
The Design Criteria required to achieve this objective is as follows:

Separation between windows and balconies is provided to ensure visual privacy is achieved. Minimum requirement separation distances from buildings to the side and rear boundaries is as follows:

Building Height	Habitable rooms and balconies	Non-Habitable rooms
Up to 12m (4 storeys)	6m	3m

Table 7: Setback requirements for habitable and non-habitable spaces for neighbouring properties

As seen in Figure 15, the windows from the bedrooms of the proposal look onto non habitable spaces when facing No. 59 Hotham Road. The compliance set back is 3m, the design has allowed 11.7m. The windows in the development bedrooms facing Hotham Road do face habitable rooms and therefore should be 6m, at the closest point, the bedroom window of the Hospital is setback 14.0m from the building located at No. 59 Hotham Road. None of the windows in the Hospital bedrooms overlook to Private Open Space of either of the units.



The following mitigating devices will be used to reduce the impact of privacy:

a. Screening devices:

In addition to placement of windows to achieve privacy to neighbouring properties, screening devices will also be utilised. Devices such as privacy film and louvres will be used in relevant locations to ensure climate control as well as visual privacy can also be managed.

b. Detailed privacy analysis to neighbours' properties:

A detailed privacy analysis was carried out for 59 Hotham Road and 6 Bidurgal Ave. (Refer to drawings A 020 and 021) as these properties are the immediate neighbours of the proposed development.

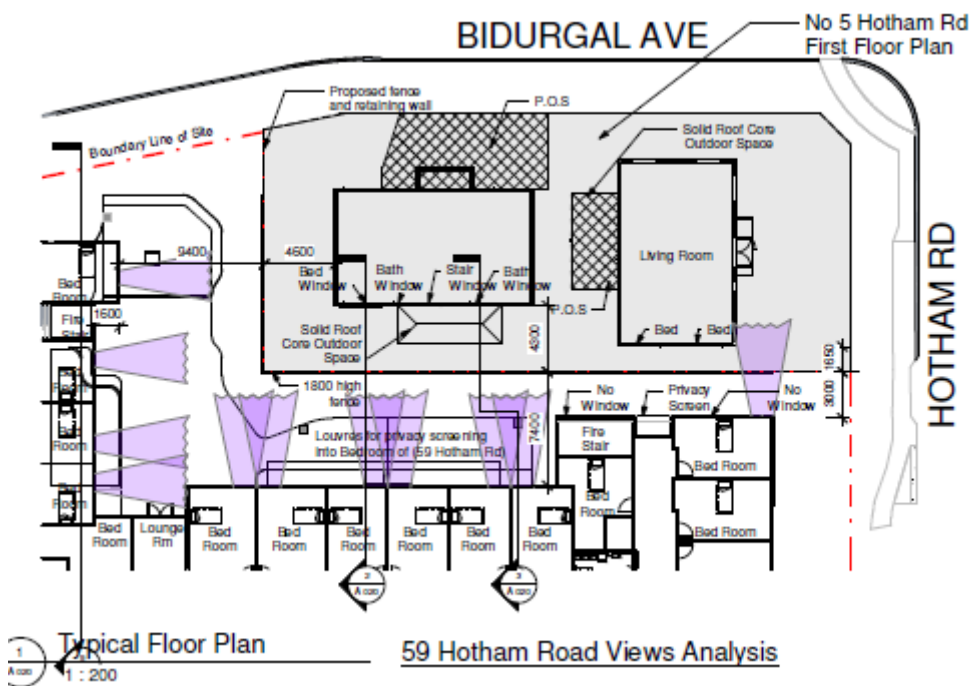
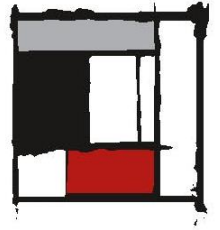


Figure 15: Evaluation of visual amenity to 59 Hotham Road. Note: POS refers to Public Open Space

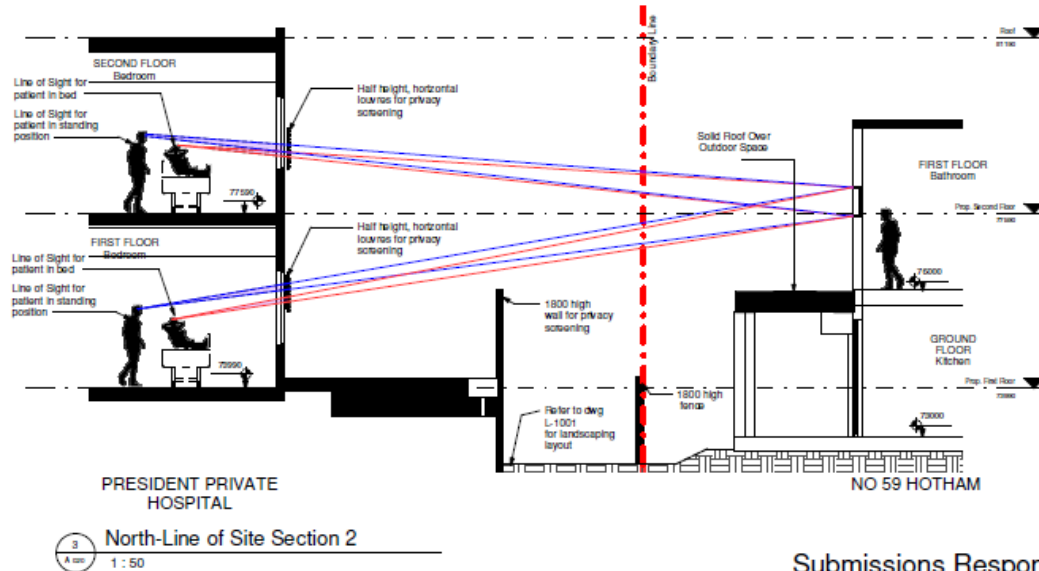
Figure 15 shows the relationship of 59 Hotham Road to the northern wing of the hospital. The extent of the viewing cones shown in mauve show the length of 6m which is suggested by objective 3F-1 of the SEPP 65: Apartment Design Guide (July 2015). The design of the hospital complies with this guideline.

The location of the Private Open Space was obtained by the approved Development Application drawings for this site and is shown in a cross hatch in this Figure and shows that none of the windows in the northern wing look directly into the Private Open spaces for either of the units.

The section through this portion of the site shows that at ground floor level, patients are looking at a fence for the main area whether they be in bed or in a standing position. Louvers will be used for the top section of these windows to



dilute what can be seen between the two neighbours over some 11.7m. Louvers will be applied to the base of the windows on the upper level for the same reason.

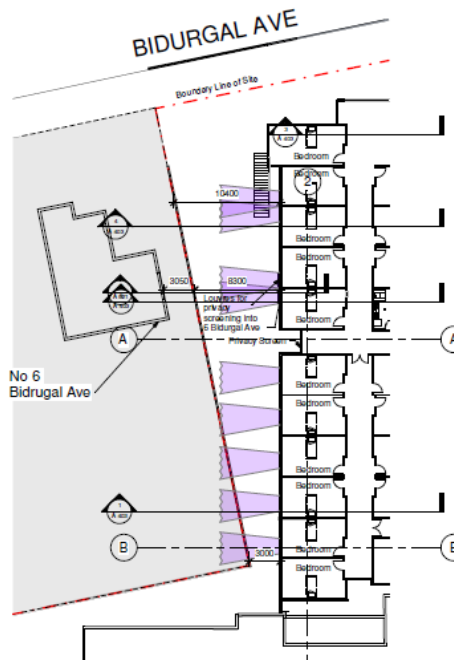
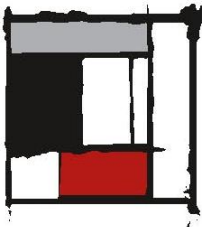


Submissions Responss

Figure 16: Further evaluation of visual amenity assessment from the northern wing of the Hospital overlooking 59 Hotham Road

The main door to the kitchen at 59 Hotham Road has an external solid roof covering, as seen in Figure 16. Therefore, similarly to the previous section, patients on the ground floor of the Hospital are looking at a colorbond fence whilst patients on the first floor are looking at a brick wall. Louvers have been located on these windows for light spill rather than visual privacy.

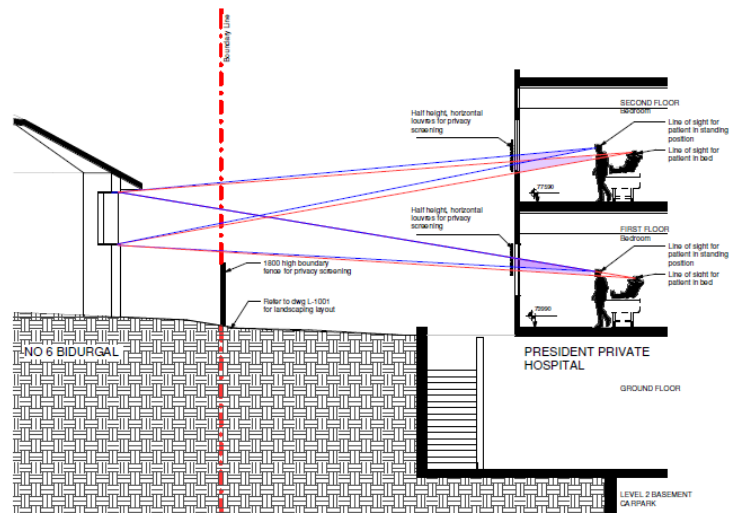
SEPP 65 requires a separation of a minimum of 6m between a habitable room of balcony to the neighbouring property, in this case a space of 11.7m has been provided.



The privacy analysis for 6 Bidurgal also shows that the windows for the hospital are more than the suggested 6m in most of the locations. A single storey garage is located to the south of the house. It is because of this structure that the overlap of the 6m viewing cone is not a concern.

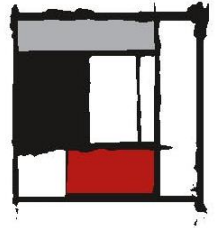
Louvers will be used for these windows to dilute what can be seen between the two neighbours over some 11.3m away.

Figure 17: Evaluation of visual amenity to No. 6 Bidurgal Avenue



SEPP 65 requires a separation of a minimum of 6m between a habitable room of balcony to the neighbouring property, in this case a space of 11.3m has been provided.

Figure 18: Further evaluation of visual amenity assessment from the northern wing of the Hospital overlooking 59 Hotham Road



3.5 R2 Zone objectives

The NSW Department of Planning, Industry and environment has requested the following matters in relation to R2 Zone objectives be addressed:

"To address the consistency of the development with the R2 zone objectives".

Response:

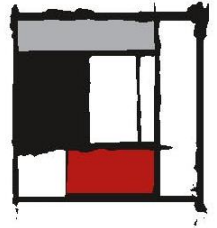
The Sutherland Shire Local Environmental Plan 2015 includes the objectives for an R2 zoning:

Zone R2 Low density Residential **1.0 Objectives of zone**

Objective as stated in Sutherland Local Environmental Plan 2015	Development Response
To provide for the housing needs of the community within a low-density residential environment.	This objective is not relevant to this development. This development does remove 2 disused houses which had been vacant for some time prior to the proponent purchasing the properties.
To enable other land uses that provide facilities or services to meet the day to day needs of residents	The proposal does not encroach or influence other land uses or facilitation of services to the area that may be required by neighbouring residents. In fact, the proposal provides health and reahilitation facilities for residents. It also provides an element of retail for the general public in the form of a pharmacy and café.
To protect and enhance existing vegetation and other natural features and encourage appropriate bushland restoration particularly along ridgelines and in areas of high visual significance.	The proposal has shown that it will have minimal influence on ecological features of the surrounding area.
To allow the subdivision of land only of the resulting lots retains natural features and allows a sufficient area of development.	This objective is not relevant to this development as there os no subdivision proposed in this development.
To ensure the single dwelling character, landscape character, neighbourhood character and streetscapes of the zone are maintained over time and not diminished by the cumulative impact of multi dwelling housing or seniors housing.	The size and bulk of the proposed development has been formulated carefully around its neighbouring properties. The development will not grown beyond its given boundaries and therefore, landscaped spaces, indoor courtyards and entry and exit zones for both pedestrian and vehicular accesses will not be altered.

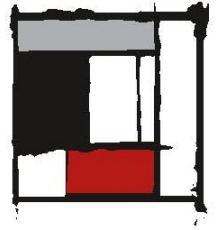
Table 8: Development response to the objectives of a R2 zone

It has been confirmed that the three (3) R2 zoned sites will be amalgamated into the SP1 site for the propuses of this development. This item was confirmed to Sutherland Shire Council agreed that this would be advisable and would be supported.



The following design decisions were made to ensure compatibility with the R2 zoning:

- The heights of the proposed building were reduced to meeting the permissible height limits for the zone.
- The land use of each of the portions of the site zones R2 are compliant to the permissible activities of the zone as provided in the Sutherland Shire LEP 2015.
- The bulk of the buildings has been compartmentalised to reflect the built proportions in the zoning.
- The aesthetics of the external of the building has been broken down to ensure large spans of solid colour of material would influence the amenity of adjacent neighbours.
- Landscaped areas have been located to face the street in the R2 zones to accommodate the 'front yards' of neighbouring homes.
- Facebrick has been used as part of the materials palette to reflect the residential character of the building.



3.6 Flooding, Drainage and Stormwater

The NSW Department of Planning, Industry and environment has requested the following matters in relation to Flooding, Drainage and Stormwater be addressed:

“ Appropriate flood / drainage measures are to be provided at the car park entrances, particularly the west carpark, where the site is flood affected. Additionally, in accordance with council's comments the flood model, flood report and architectural drawings are all to be updated and resubmitted with the necessary investigative details that have been requested by Council.”

“ DPIE has concerns with the adequacy of the response provided to flooding matters. The current report in its 'draft' revisions will be reviewed by our specialist and further updates are likely required to complete our assessment. As previously requested, this review requires the submissions of electronic flood modelling data.”

Response:

Martens Consulting Engineers have provided a Flood Study and maps (refer Appendix L) is response to Sutherland Council's concerns.

Supporting Documents:

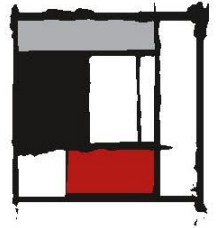
The following documents are submitted with this submission showing the addition work carried out:

- Appendix L – Flood Study and Maps
- Appendix Na-Utility Survey
- Appendix Nb-ALS CCTV Site Report
- Appendix Nc-ALS Site Report
- Appendix Nd-Utility Survey (Issue B)

Marten's assessment concluded:

1. Proposed flood characteristics are largely consistent with existing conditions, and differences due to the proposed development are negligible.
2. The proposed development effectively renders the site development area flood free in all flood events up to and including PMF.
3. The proposed development would have not material offsite flood impacts.
4. Compliance with Council flood planning level requirements for building and car park levels are achieved.
5. The proposed development is compatible with the existing floodplain environment.
6. The compliance assessment demonstrates the site can be developed in accordance with Council flood planning requirements.

Martens have suggested the location of a swale to the north western corner. The Landscaping and Architectural design has incorporated the swale into the overall design. Martens confirm in their report the following:



1. The proposed swale redirects the upstream overland flow and prevent inundation of the proposed south western car park, with the discharge location further east of the proposed driveway crossing into President Avenue remains approximately the same as existing conditions, hence the swale does not materially affect local flood characteristics and the overall range of flood depths, velocities and hazards remain the same as in existing conditions.
2. All flood events up to and including the 1% AEP even t are fully contained within the proposed swale.
3. Apart from shallow flood delths in the soth-western landscape area, the proposed development is completely flood free in the PMF event.

Regarding the Offsite Flood Impacts:

1. The proposed development has negligible offsite impacts on the floodplain environment in the 1% AEP event.
2. These impacts do not affect any neighbouring residential lots or existing buildings (ie <0.02m increase in flood water depth), and only occur locally as a result of the concentration of the upstream overland flows due to the proposed swale.
3. Flood impacts affecting the President Avenue would be considered acceptable as they generally result in no increase in ARR2019 flood hazard category which could affect existing trafficability of the road.
4. Thus, the proposed development is considered to have no material off-site impacts.

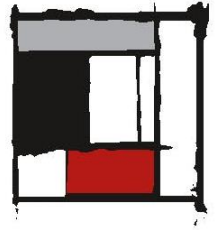
The DPIE also asked for the following via email dated 04/02/22:

"When re-submitting the RtS could you please include the following information in the (Marten's) Flood Assessment report. Please see below;

1. *Table 8 needs to include responses to issues 1-13 raised by council, the current version of the report only discusses issues 1-6.*
2. *To address point 13 of Table 9, our hydrologist has advised the information is required;*
 - *Existing Conditions maps (depth/level, velocity, ARR2019 hazard) for the 5% AEP, 1% AEP with climate change and PMF events (only provided for proposed conditions);*
 - *Flood impact map for the 5% AEP event (only provided for the 1% AEP);*
 - *Presentation of flood impacts down to 0.01 m (currently to +/-0.02 m).*
 - *Additional analysis to manage flood impacts."*

Response:

Martens has revised their report to include the above information. It can be found in Appendix L – Flood Study Report and maps.



3.7 Clause 4.6 Variation request for exceeding Height Limit

The NSW Department of Planning, Industry and environment has requested the following matters in relation to the Height Limit be addressed:

"The section 04 architectural diagram within the architectural plans package appears to demonstrate a height exceeding 15m, whereas the EIS states that the highest point of the proposal within the SP1 zone will be below 15m. in addition, for the proportions of the development which fall into the R2 zone, the height restriction is 5.5m and therefore the proposed building height of 7.5m exceeds this requirement. It is therefore requested that a clause 4.6 variation be prepared justifying the LEP non-compliances.

The 4.16 variation requesting relating to relaxation of building height controls includes a number of statements that appear to relate to a different project. Please update for consistency relevant to the current proposal."

Response:

Permissible Building Heights are provided in the Sutherland Shire DCP 2015 mapping showing the maximum permissible heights as being:



Area I: 8.5m
SP1: No height has been specified

The proposed site is zoned SP1 and does not have a permissible height as recorded in the Sutherland Shire DCP 2015 and LEP 2015.

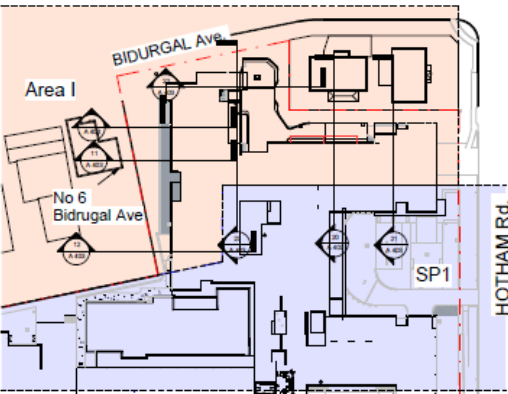
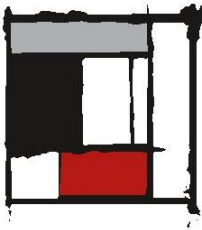
No. 61 Hotham Road and Nos. 2 and 4 Bidural Avenue are also included as part of this development. These three (3) sites are zoned Area I on the Building Height Map. The maximum building height in this zone is 8.5m.

Figure 19: Permissible height diagram taken from Sutherland Shire Council DCP 2015

Supporting documents:

The following documents have been provided with this submission in support of the additional assessment carried out by the design team:

- Architectural drawing: A 403 Building Heights
- Appendix M – Clause 4.6 variation request



19% of the building floor area is located within the R2 zone. Of this area only 14.5% exceeds the height limit for Area I as shown on the Height of Buildings Map. This has led to the necessity of a Clause 4.6 Variation Request.

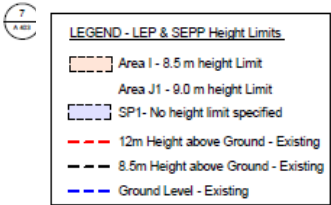
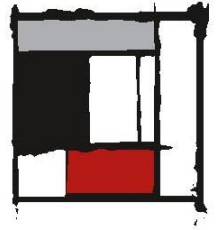


Figure 20: 19% of the development floor area is located in an Area 1 zone



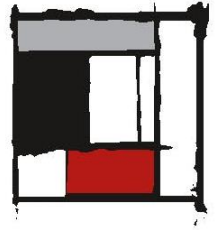
3.8 Retention of Trees

The NSW Department of Planning, Industry and environment has requested the following matters in relation to the retention of Trees be addressed:

“Further consideration is to be given to reconfiguring the design of the proposed development to retain significant trees on the site (noting that the four trees currently proposed for removal are considered by the Department to provide significant landscape contribution.”

The table showing trees to be retained following further design consideration is unclear. Please update the table showing the status of all trees on site including previous status and their current proposed status with relevant comments.”

Tree (no) (Refer to appendix 7-Tree Protection Plan)	Retained / Pruned / Replaced
T1	Retain
T2	Remove
T3	Remove
T4	Remove
T5	Remove
T6	Remove
T7	Retain
T8	Remove
T9	Remove
T10	Remove
T11	Remove
T12	Retained including pruned canopy
T13	Remove
T14	Remove
T15	Remove
T16	Remove
T17	Remove
T18	Retained
T19	Remove
T20	Remove
T21	Remove



Tree (no) (Refer to appendix 7-Tree Protection Plan)	Retained / Pruned / Replaced
T22	Remove
T23	Replaced
T24	Remove
T25	Remove
T26	Remove
T27	Remove
T28	Remove
T29	Retained
T30 (x2)	Remove
T31	Retained
T32	Retained

Table 9: Proposed treatment of trees on site

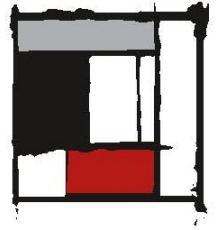
In Summary:

The tree Canopy Statistics therefore are as follows:

	Before Development	After development
Total tree No.	34	161
Total sqm. Canopy cover (estimate)	1,020	4,830
Total site area	9,520	9,520
Total percentage	10%	50%

Table 10: Proposed canopy increase showing a 50% of the site will be covered compared to 10% at present.

The landscape masterplan for the proposed development sees a growth of 50% of the site area in canopy coverage when compared to a 10% coverage in the existing situation.



3.9 Slip Lane

The NSW Department of Planning, Industry and environment has requested the following matters in relation to the additional of a slip lane on President Avenue be addressed:

“As suggested in council’s submission, for safety reasons consideration should be given to providing a slip lane at the President Avenue entry to the carpark with a separate exit to President Avenue for the proposed site. Consideration of this option should be investigated, and the outcome of the investigation provided.”

Response:

Whilst a slip lane was previously considered for a driveway located at President Ave in a previous application, it was never implemented. At the Department’s request, further investigation was carried out by Grey’s Consulting.

Supporting Documents:

The following report has been provided by Grey’s Consulting (Appendix K).

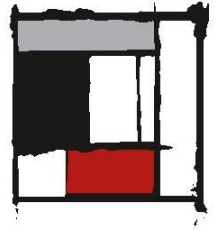
- P1924.002T President Private Hospital Assessment of Proposed Access driveway

Greys Consulting was engaged to undertake an assessment of requirement for a slip lane at the President Avenue proposed accessway driveway and a separate driveway to President Ave.

A crash investigation at President Ave. based on available crash data between 2015 and 2019 revealed that no rear end crash pattern exists at the eastbound approach of President Ave / Hotham Road intersection. There has been one crash with serious injury back in 2017 with Right-Through RUM Code which is irrelevant the proposed driveway. In general assessment of crash data did not reveal any evidence that the proposed driveway would exacerbate or cause a rear-end or left-through crash pattern at the western approach of President Ave / Hotham Road intersection.

It is forecast that between 30 and 5 vehicles would access the staff carpark during the AM and PM peak hours. The maximum queue length during AM and PM peak hours is on the order of 220m along President Ave western approach. It is concluded that the driveway would be blocked (by queuing vehicles) during the AM and PM peak hours period and access / egress would occur within a very low speed environment where drivers’ cooperation is maximum. Hence, proposed location of driveway is deemed to be far enough from the intersection in terms of access and egress speed.

Due to reverse relationship between the accessing and egressing vehicles during the peak hours, significant conflict between the incoming and outgoing vehicles during the peak hours would be improbable. Hence separation of the entry and exit driveways is deemed unnecessary. The swept path of a B85 and a B99



passing each other at the proposed driveway has been checked to ensure sufficient clearance between entering and existing vehicles at the same time. Swept path diagram and associated manoeuvres are provided and show no conflicts.

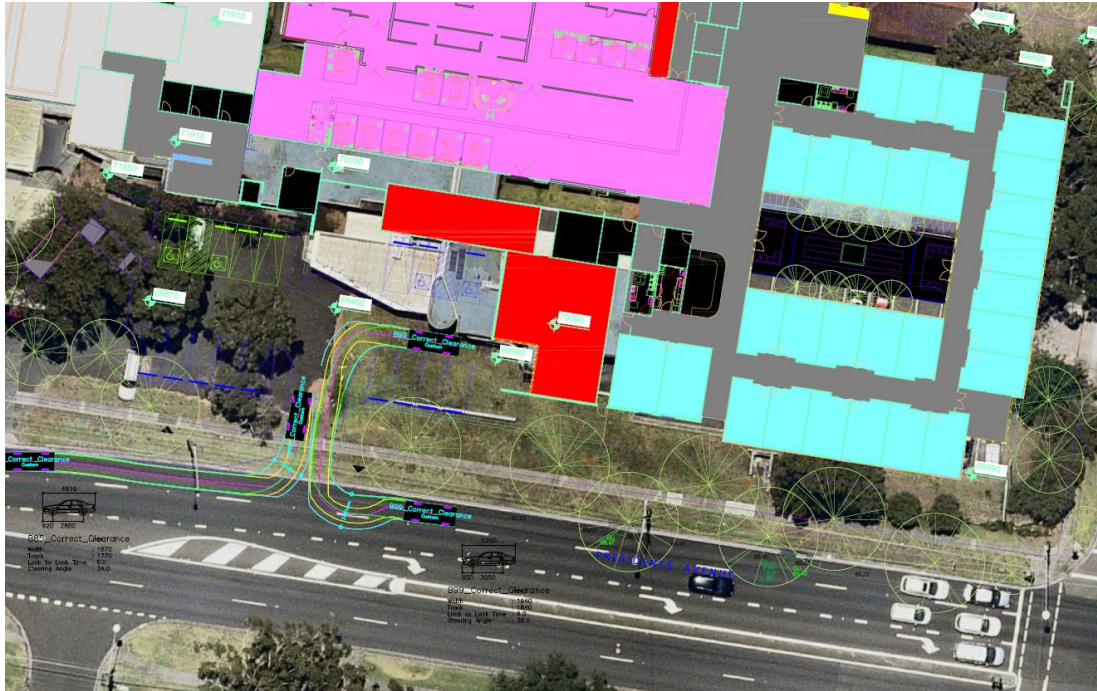


Figure 21: Swept paths to President Avenue driveway

The DPIE has carried out a peer review produced by TTPP. In relation to access to President Ave they say *“Vehicle access from an arterial road has not been fully considered and has not addressed Council’s safety concerns.”*

Response:

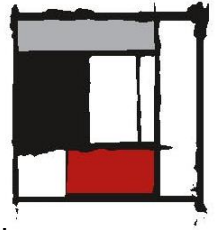
Grey’s Consulting gave further consideration to the findings included in their previous report.

Supporting Documents:

The following report has been provided by Grey’s Consulting (Appendix Ka).

- P1924.001L President Private Hospital Assessment of Proposed Access Driveway RTS

Greys Consulting stands by their original findings and confirm that a slip lane is not warranted. They conclude by saying, *“Based on Australian rules, two lane clearance would be required for turning left into a lane. Considering the fact that most of the vehicles turn onto the road during a red-light phase and within appropriate gap, this is not deemed to be a safety issue. In additional, capacity provision based on AS2890.1 at signalised intersection is totally irrelevant to provision of a slip lane.”*



In consideration of Sutherland Shire Council's concern regarding the President Ave driveway the design team worked with ML Traffic to provide a wider entry driveway to facilitate turning in and out of the kerbside lane only. Refer dwg A028 for revised arrangement. This wider driveway has been achieved without impacting on the landscape design.

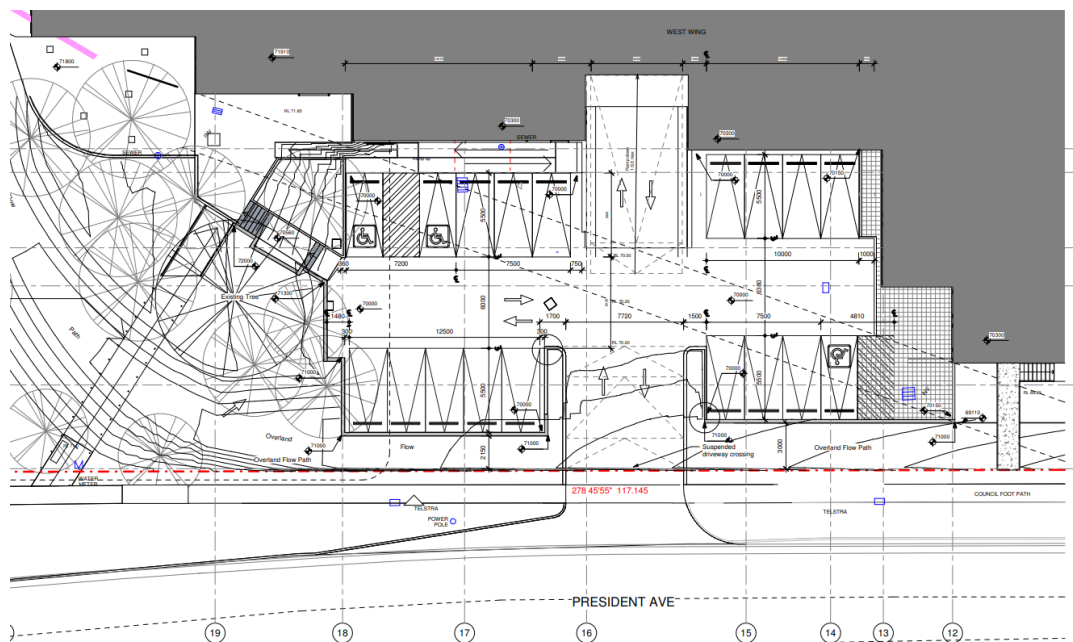


Figure 22: showing the wider driveway access to President Ave.

This design is supported by the ML Traffic swept path diagram.

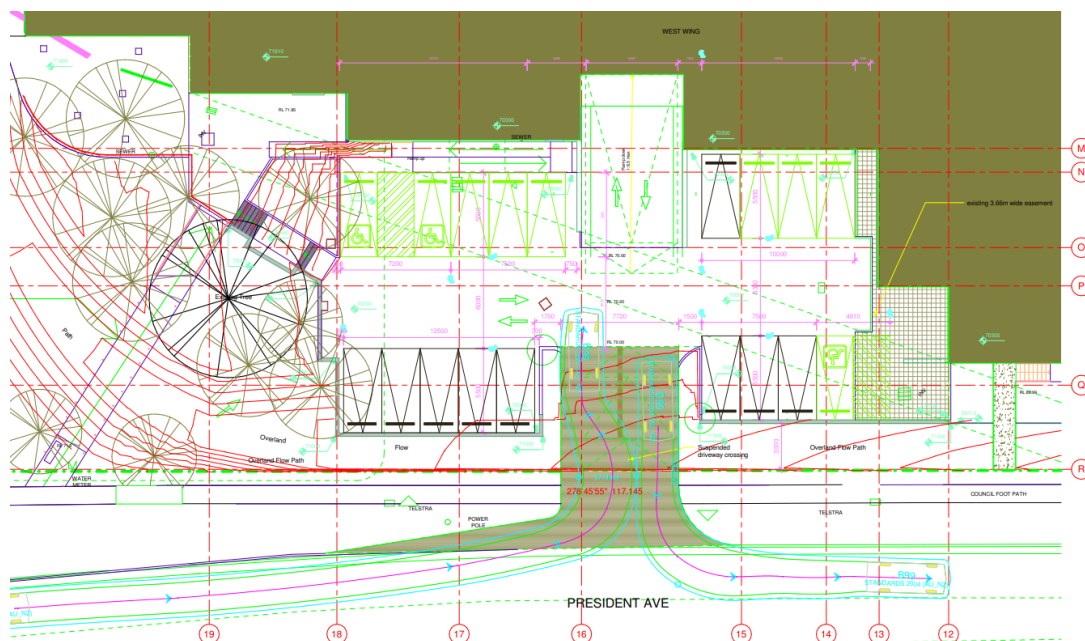


Figure 23: Swept path detail shown for the wider access driveway to President Ave.



3.10 Parking Survey

The NSW Department of Planning, Industry and environment has requested the following matters in relation to a Parking Survey be addressed:

"A parking survey should be undertaken having regard to similar size private hospital developments with more than 180 beds and 100 staff in order to determine if the proposed parking rates to support that parking demand is satisfactory for the proposal and sufficient parking is proposed."

Response:

Sutherland Shire council does not include guidance for the number of car parking spaces required in a hospital. A comparative study was therefore carried out with Kareena Private Hospital which is a health care facility similar in size, functionality and staffing.

Supporting Documents:

The following document was used to provide a car parking comparison in response to this item.

- 08_0169 Kareena Private Hospital – App. G Traffic Impact Assessment (dec 2008)

Sutherland Shire Council Development Control Plan 2015 does not provide the minimum car parking rates for private hospitals. In the absence of any guideline from Council, the RTA Guide to Traffic Generating Developments 2002 has been applied so provide a required number of parking spaces based on the following calculation.

The peak parking accumulation (PPA) may be estimated by:

$$PPA = -19.56 + 0.85B + 0.27ASDS$$

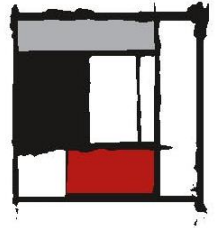
Where:

- (B) = the number of beds
- (ASDS) = the average number of staff per weekday shift.

	Number of beds	Average number of Staff per weekday shift	Provided number of parking spaces
Current Proposal	182	102	168
Kareena Private hospital	176	138	127

Table 11: Comparative study of car parking provision

Kareena Private Hospital is a comparable hospital to the one being proposed. The hospital is a 176-bed facility and caters for a full range of specialties including cardiology, orthopaedics and general surgery. Kareena Private therefore is a



similar size Hospital as the one being proposed and so is ideal for a comparative survey regarding car parking.

Kareena Private has 138 staff per weekday shift and is required to have 123 car parking spaces, 127 spaces have been provided.

The proposed Hospital has 102 staff per weekday shift which is less than Kareena. However, utilising the calculation provided in the RTA Guide to Traffic Generating Developments 2002, this proposal will require 163 parking spaces and 168 spaces have been provided. Utilising the calculation from the RTA guideline this proposal has had to provide 40 additional spaces and successfully delivered 45 additional spaces than what has been provided at Kareena Private Hospital

The original proposal had a shortfall of five (5) car parking spaces which led the design team to test the locations of drop off zones, areas in and around the ramps as well as the layout of accessible parking spaces. The result is the location of seven additional parking spaces located as follows (marked in orange on the nominated drawings sheets):

- 2 spaces under the ramp in basement level 4 (Refer drawings sheet A 102)
- 1 space beside the ramp in basement level 2 (Refer drawing sheet A 103)
- 2 spaces on the northern end of the car park accessed directly off Hotham Road. These spaces are a tandem design and are for service vehicles (Refer drawing sheet A 104)
- 2 spaces on either side of the ambulance bay in the car park located directly off President Ave. These spaces were designed by rearranging the accessible car parking spaces. The number of accessible car parking spaces was reduced however, the number being provided remains compliance with the relevant codes. (Refer drawing sheet 104)



3.11 TPIA and bicycle

The NSW Department of Planning, Industry and environment has requested the following matters in relation to Traffic and Parking Assessment be addressed:

"The Traffic and Parking Assessment (TPIA) provided as part of the proposed development does not address TfNSW policies for integrating transport with landuse, or the requirements of the Sutherland Shire Development Control Plan (DCP) 2015 regarding off-street bicycle parking and end of trip facilities. The application is to be amended including the TPIA to satisfy the minimum requirements of the Sutherland Shire DCP 2015 in regard to the provision of adequate and suitably located secure end of trip facilities and off-street bicycle parking in accordance with Australian Standard 2890.3"

Response:

Provisions such as an End of Trip Facility and integration of the Sutherland Shire Cycleway network will assist greatly to implementation of a Green Travel Plan.

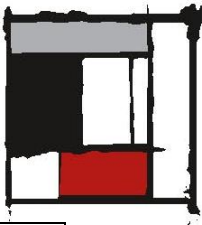
Supporting Documents:

The following documents have been provided with this submission:

- Architectural Drawing No.: A 103 Basement Plan LVL 1 & 2

Chapter 36 of the Sutherland Shire DCP 2015 provides guidelines for Vehicular Access Traffic Parking and Bicycles. Section 5.2 provides the controls for All Developments, except dwelling houses, dual occupancies and Multi Dwelling Housing.:

Objective	Project Response
1. As a minimum, developments must provide 1 bicycle parking space per 10 car parking spaces for the first 200 car spaces, then one space per 20 parking spaces thereafter. In addition, 1 unisex shower is required per 10 employees.	163 car parking spaces have been provided in total therefore 16.3 bicycles spaces are required. 20 spaces have been provided. There are staff male and female shower facilities at a number of locations throughout the hospital. In accordance with the National Construction Code , 2 unisex toilet and shower facilities are located within the end of trip facility.
2. Bicycle parking facilities are to be installed in accordance with Australian Standard AS2890.3-Bicycle Parking Facilities (as amended), Austroad's Guide to Traffic Engineering Practice – part 14 – Bicycles and the Austrads Bicycle Parking Facilities: Guidelines for Design and Installation (AP-R527-16)	Parking shall be installed to comply with the stated codes.
3. Bicycle parking facilities must address the following design principles: A. Accommodate all usual type of bicycles such that damage to them is minimised during storage and retrieval. B. Not pose a hazard to bicycle users, pedestrians or motorists.	The location of the end of trip facility is at the base of the main access entry ramp from Hotham Road. Access is secure and private for all users and out of sight from the main road and the main entry ways. The area will be well lit at night and will be available for use 24/7. Access to the main hospital is via a lift and therefore users do not



C. Be well lit, safe and secure, easy to access and use. D. Cater for the different needs to residents, employees and visitors to the development	have to leave the building to enter back into the building. Bicycle access doesn't conflict with pedestrian or vehicular access.
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Table 12: Development response to the objectives for bicycle provisions in developments

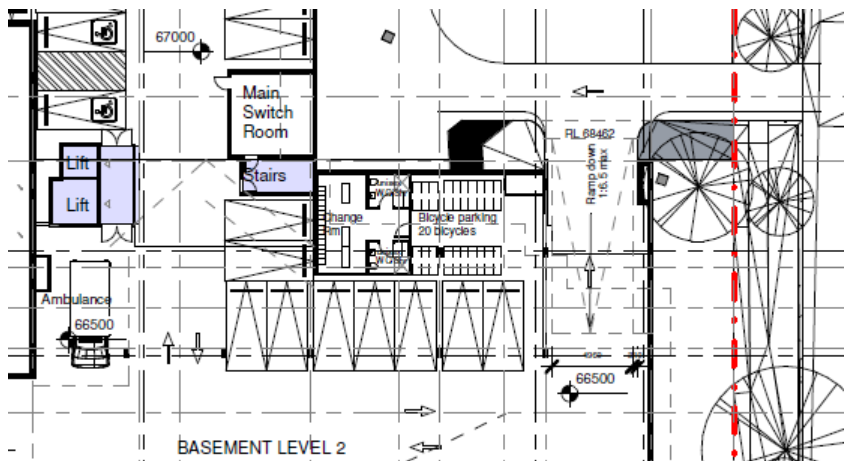


Figure 24: The end of trip facility for bicycle parking is located in the Basement Level 2

The bicycle parking and end of trip facilities is located on basement level 2 (Refer drawing A 103).

The space is located at the base of the entry ramp accessed from Hotham Road. The immediate access from the entry ramp ensures a convenient

location for bicycle riders, the location is private whilst being secure and users can access the main entry foyer either via the stairs or the lift without having to exit the building only to entry again.

The facility has parking accommodation for 20 bicycles, 2 unisex toilets including showers and a locker and change area. The room will utilise sensor lights to ensure user safety and CCTV to the entry / exit point will further address user safety. The access and usage of the end of trip facility is located well away from access paths used by pedestrians, private vehicles, and service delivery vehicles.

It is anticipated most nursing staff commuting via bicycle will use the main staff change room on the ground floor rather than the end of trip facility. These change rooms have four male and four female showers. In addition, a unisex staff shower is provided on the first floor and second floor. This addresses the intention of the DCP for the provision of showers for cyclists.

Additional casual bicycle parking is provided at the main hospital entrance off Hotham Rd and adjacent to the entrance to the Wellness Centre off President Ave.

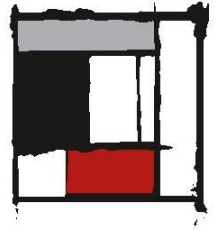


Figure 25: Relevant section from the Sutherland Shire Cycleway Network Map

The Sutherland Shire Cycleway Network Map is currently under consideration. The yellow lines show the location of existing cycleways whilst the blue lines show the location of the proposed network. The brown line shows the existing railway corridor where all Railway Corridors are potential Off-Road Regional routes.

The proposed site is marked by a red cross and is not conveniently located to any of the existing cycleways. The proposed site does have an opportunity to be linked to a new cycleway route using Bidurgal

Avenue. As the Network map is still being developed a convenient route can be integrated with council via the Green travel Plan.

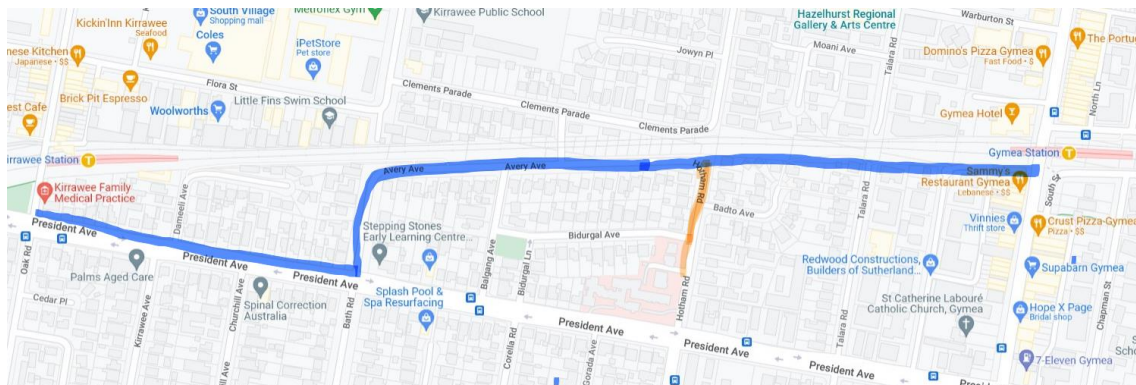
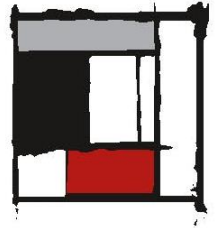


Figure 26: developments to the current Sutherland Shire Cycleway Network Map

Current developments of the Sutherland Shire Cycleway Network Map seen above show that the Bicycle route may no longer go along the Kingsway. The development site shown in pink, could be linked to the cycleway via Hotham Road which is a busy road and has limited space for a dedicated bicycle lane. This will be a future concern for added consultation once the location of the cycle is confirmed. It may be beneficial to move the cycle access to the site to be via Bidurgal Ave. rather than off Hotham Road. The design team aim to undertake further consultation with Sutherland Shire Council once the final route of the cycleway is determined.



3.12 Green Travel Plan

The NSW Department of Planning, Industry and environment has requested the following matters in relation to Green Travel Plan be addressed:

“Submit an updated preliminary Green Travel Plan that responds to the mode split assumptions contained in the updated TPIA and also responds to the specific documents relating to the hospital travel plans at <http://data.mysydney.nsw.gov.au/Travel+Choices/Travel+Plan+Toolkit+Hospital+Precinct.pdf>

Please update the green travel plan to address all the content requested by TfNSW. Please ensure that the plan makes firm commitments in order to implement the requirements and achieve the objectives of the plan.”

Response:

The TPIA is a tool which will be incorporated into the operations of the Hospital once it is functioning.

Supporting Documents:

The following document has been submitted with this proposal:

- Hospital precinct Audit checklist (Appendix J)

A Green Travel Plan (GTP) sets out a plan designed to encourage the use of more sustainable modes of transport than private vehicles. The plan is written for a specific site / project to address the community most likely to be affected by the plan. The plan typically includes targets and actions to promote walking, cycling and the use of public transport or car-pooling.

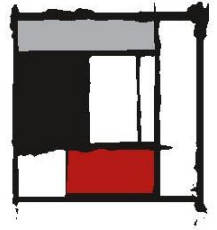
The site is well connected through local pedestrian footpath networks. Signalised pedestrian crossings across President Avenue provide pedestrians direct access to the site. Bus stops are only a short walk from the hospital and are easily accessible to the public. Direct access to both Kirrawee and GyMEA railway stations are provided through local footpath network. No cycling facilities are presently provided on-site for staff or visitors.

A preliminary GTP has been provided by ML Traffic and is provided as Appendix I with this response. This report states *“Travel plans can assist in increasing accessibility whilst reducing congestion, greenhouse gas emissions, local air pollution and noise.”*

The objectives of the GTP are as follows:

- To reduce staff single occupancy travel to work
- To increase the proportion travelling to the hospital by sustainable modes
- Increase car sharing and car-pooling.

The site is well connected to public transport and in general is supported by footpaths in relatively good condition to allow able bodied visitors or staff to walk to and from the Hospital.



A travel coordinator will be appointed to the hospital as part of its operations. The action plan which will be undertaken will include:

- A travel plan email and message board that will contain public transport information and services.
- Car sharing will be promoted
- An annual Travel smart Day will be organised
- Information of public transport options will be provided within the hospital
- Identify transport services in the evenings especially for periods after 9pm to encourage public transport where people generally avoid public transport usage
- Consult with Council in a co-ordinated approach to improving public transport access

Further, a Hospital Precinct Audit has been completed for the site and is attached as Appendix J with this submission. This audit has been prepared using the Travel plan Toolkit for Hospital Precincts.

The DPIE carried out a peer review (The peer review was carried out by TTPP and can be seen in Appendix Ad of this submission) of the development responses provided in relation to traffic behaviour, car parking, and The Green Travel Plan. The following table confirms the concerns raised in the peer review and provides a direct development response to the concern

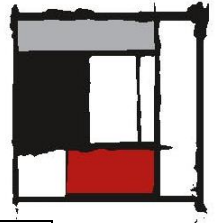
Concern raised in Peer Review	Development response
Traffic and Accessibility assessment documentation did not adequately address each of the SEARs in the following:	
• Fails to address and demonstrate how the proposed development aligns with the relevant strategic transport planning objectives as specifically - The Metropolis of Three Cities- the Greater Sydney Region Plan - South District Plan - Future Transport Strategy 2056	Alignment with these State Strategic plans were carried out in Sections 7.4.2 and 7.4.4 of the previous Environmental Impact Statement which was accepted by the DPIE prior to public exhibition. Duplication of the same information is unnecessary.
• Public transport. The report lacks an assessment of the frequency of services or how people would walk to and from these locations and the capacity of the services. No details or mode share have been provided.	Refer Appendix I. The two main bus routes are identified in Section 2 of the Green Travel plan. This report also provides a description of pedestrian behaviour. Bus routes and location of stops are shown on drawing A 012 submitted.-
• There is no explanation of how the traffic distribution was developed and there does not appear to be any clear methodology or process involved.	The methodology and explanation for how the traffic distribution is noted as "was assessed using the SIDRA 9.0 software package."



Road Safety – There is no mention road safety for vehicles and pedestrians or road safety measures. Noted that an assessment of the access location was provided however we do not believe it adequately addresses Council's safety concerns.	Road safety has been taken into consideration and is shown in Appendix Ha and Hb.
Details of travel demand management measures, wayfinding strategies etc. The Green Travel Plan is very cursory and does not provide any clear targets or strategies.	Refer Appendix I for details of travel aims and impacts.
Impacts on on-street parking has not been considered, or the existing on-street parking conditions.	The development has not placed any of its parking requirements on using street parking. The required street parking as set down by Sutherland council has been provided within the development site. Therefore, there is minimal demand for street parking for President Ave, Hotham Road or Bidurgal Ave. Note that onsite parking will not be charged for.

Peer Review Assessment of Traffic Report

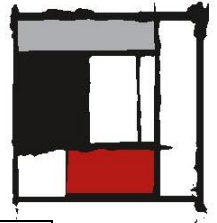
Concern raised in Peer Review	Development response
On-Site Parking (Section 2.7) ML Engineers assess that the car park fronting President Ave has an existing supply of 20 spaces for patients. From site observations, the car park has no line-marking and hence it cannot be formally understood to have 20 spaces. In addition, the parking survey undertaken by the proponent shows that the car-park is occupied with 15-16 spaces through a typical weekday. Although there may be a theoretical maximum of 20 car spaces, this may be contingent on patient / visitor behaviour and not formally recognised without line marking for guidance.	In the absence of line marking, a area was measured and the standard car parking measurements were applied to the various spaces, the result being 20 car spaces were available. It will be a part of this development to reinstate all car park line marking to confirm locations and allocations of each space to align with the data presented in table 6 of Appendix H.
On-Site Parking (Section 2.7, Table 3) The table should differentiate between hospital staff and visitor parking spaces to better understand the demand profiles and which spaces are more frequently occupied. Specifically, it is expressed that the southern car park fronting Hotham Road has 25 car spaces for both staff and visitors, with five spaces for doctors and surgeons.	Usage of parking spaces was collected during the car park survey. Table 3 in ML Traffic's report (Refer Appendix H) does show the differentiation between hospital staff usage compared to the general public. Based upon these numbers the allocation of car parking areas was established.



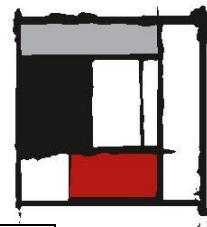
Forecast Traffic volumes (Section 5.2, Figures 10 and 11) The rational and logic behind the chosen traffic distributions shown in Figures 10 and 11 are not determined by reading the report. Further information would be helpful to explain the reasoning for allocation and distribution decisions.	The numbers provided in these two diagrams were provided using on site counters as well as SIDRA 9.0 software.
Appendix B (Table B2) Table B2 of the SIDRA outputs for the Existing Traffic and Additional Hospital Traffic shows a reduction of 80 vehicles in the through movement at President Ave west approach. TTPP suggests further clarification of this reduction as there is no determinable mention of this reduction of background traffic.	Table B2 has been amended to address this item.
Appendix A and B The SIDRA traffic modelling analysis does not assess a 10 year future scenario of the president Ave – Hotham Road – NW Arm Road intersection. Council questions the timeline put forward for the buildability for the development and so suggest the following to be carried out: • 10-year future scenario, and • 10-year future scenario with development traffic	Refer 5.3, 5.4 and 5.4 of Appendix H.
Model Calibration and Validation There has been no evidence to explain the modelling methodology and that the models are calibrated and accurately represent the existing conditions.	All counters and data has been applied with the assistance of the SIDRA software package.
General Comments The reports do not adequately addressed issues of access to public transport or strategies to reduce dependence on private vehicles and focuses on private vehicle access. The assessment also does not consider future traffic conditions and cumulative impacts of development in the area or future transport infrastructure.	These issues have been discussed in Appendix I. Train and bus access and routes have been confirmed as well as the ease of pedestrian pathways around the site as well as to the nearby train stations.

Response to Stakeholder Submissions

Concern raised in Peer Review	Development response
Vehicle Access Arrangement For safety reasons Council requested that the EIS traffic assess consider the provision of a slip lane at the President Ave entry to the carpark with a separate exit to President Ave for the proposed site. Consideration of this option should be investigated, and the outcome of the investigation provided.	Greys Australia Pty Ltd have revisited the information they provided in their original report and have confirmed (Refer to Appendix L) that they support their original recommendation and advice.



A review of the access arrangement is provided in the Greys Australia Pty Ltd letter dated 28 March 2021 but does not in TTPP's opinion address Council's safety concerns.	On further consideration of Council concerns for safety the driveway has been made wider and a traffic island included within the driveway to allow a left turn into the driveway without adding to queues whilst waiting to turn right onto President Ave. Even the largest standard vehicle (as TTPP have used in their swept path modelling) can be safely accommodated. Refer Figures 22 and 23 of this report.
Parking Provision A parking survey should be undertaken having regard to similar sized private hospital developments with more than 180 beds and 100 staff in order to determine if the proposed parking rates to support the parking demand is satisfactory for the proposal and sufficient parking is proposed	A comparison to a similar sized hospital was carried out in section 3.10 of this document. Kareena Private Hospital has 138 staff per weekday shift and is required to have 123 car parking spaces, 127 spaces have been provided. The proposed development will have 102 staff per weekday shift which is less than Kareena. Utilising the calculation provided by the RTA Guide to Traffic Generating developments 2002., this proposal will require 163 parking spaces and 168 have been provided. is of a comparative size with a comparative number of staff. Utilising the calculation from the RTA guideline, this proposal has had to provide 40 additional spaces and successfully delivered 45 additional spaces than what was provided by Kareena Private Hospital
Cycling Requirements The TPIA does not address TfNSW policies for integrating transport with land use. Or the requirement of the Sutherland Shire Development Control Plan (DCP) 2015 regarding off street bicycle parking and end of trip facilities. Developments just provide one bicycle space per 10 car parking spaces for the first 200 car spaces. For the proposed 158 car parking spaces, allocation must be provided for 16 parking spaces. Additionally, one unisex shower must be provided per 10 employees as part of end-of-trip facilities. For the weekday shift (the peak for rostered hospital staff) 102 staff members would be on site. Hence, 10 unisex showers would be required. Bicycle parking for employees should be designed according to Class 1 or 2 of the AS2890.3 and bicycle parking for visitors should be designed accordingly to Class 3. These classes relate to the accessibility and security of bicycle parking racks / cages.	The end of trip room is discussed at length in section 3.11 of this document. As confirmed in Section 4.2 of ML Traffic's report, 20 bicycle spaces and 2 unisex showers are located in the end of trip room located on the basement level of level 2. The remaining 8 unisex showers are located within the staff facilities throughout the hospital. The location of the end of trip facility is at the base of the main access entry ramp from Hotham Road. Access is secure and private for all users and out of sight from the main road and the main entry ways. The area will be well lit at night and will be available for use 24/7. Access to the main hospital is via a lift and therefore users do not have to leave the building only to enter back in. Bicycle access does not conflict with pedestrian or vehicular access.



Green Travel Plan ML Engineers have not allocated any mode split assumptions not targets in the Green Travel Plan, and actions / initiatives are vague.	Refer Appendix I. which provides target and aims for the green Travel plan.
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Table 13: Concerns from TTPP Peer Review with Development Response

3.13 Aboriginal Cultural Heritage

The NSW Department of Planning, Industry and environment has requested the following matters in relation to Aboriginal Cultural Heritage be addressed:

“The Cultural heritage reporting lists 3 types of possible landforms that may exist across the site, please provide the spatial distribution of these landforms across the total area of the site (9519m2).

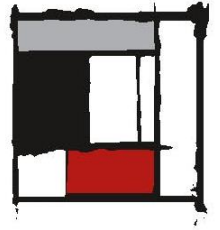
Site survey results indicate that less than half of the total site has been surveyed across only one landform. Please complete further site investigations to ensure that sufficient site coverage has been achieved.

Similarly, further test excavations are required to be completed in accessible areas of the site particularly those identified in figure 2.28 as low existing disturbance located within the development footprint.”

Aboriginal Cultural Heritage reports have been provided by Archaeological Management and Consulting Group & Streat Archaeological Services Pty Ltd. Refer Appendix Oa, Ob and Oc)

Consultation for this report was undertaken in accordance with Part 6: National Parks and Wildlife Act 1974: Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010). Archaeological Test excavation was completed in accordance with Code of Practice for the Investigation of Aboriginal Objects in NSW (DEC CW, 2010)

Test excavation was undertaken in two phases, with phase one performed over 2 days and phase two performed over one day. The proposed development will impact the entire study area. In review of the test excavation results, of which little intact soils were found to be present, the study area was found to be absent of any Aboriginal objects and / or deposits or features of cultural and archaeological significance. Therefore, further investigation is not warranted and further works are not necessary. Therefore, further investigation is not warranted and further works are not necessary and works may proceed with caution.



3.14 Easement Proposal

The NSW Department of Planning, Industry and Environment has requested the following matters in relation to the easement proposal be addressed:

“Please show the proposed alignment of the realigned easement with respect to proposed and existing infrastructure.”

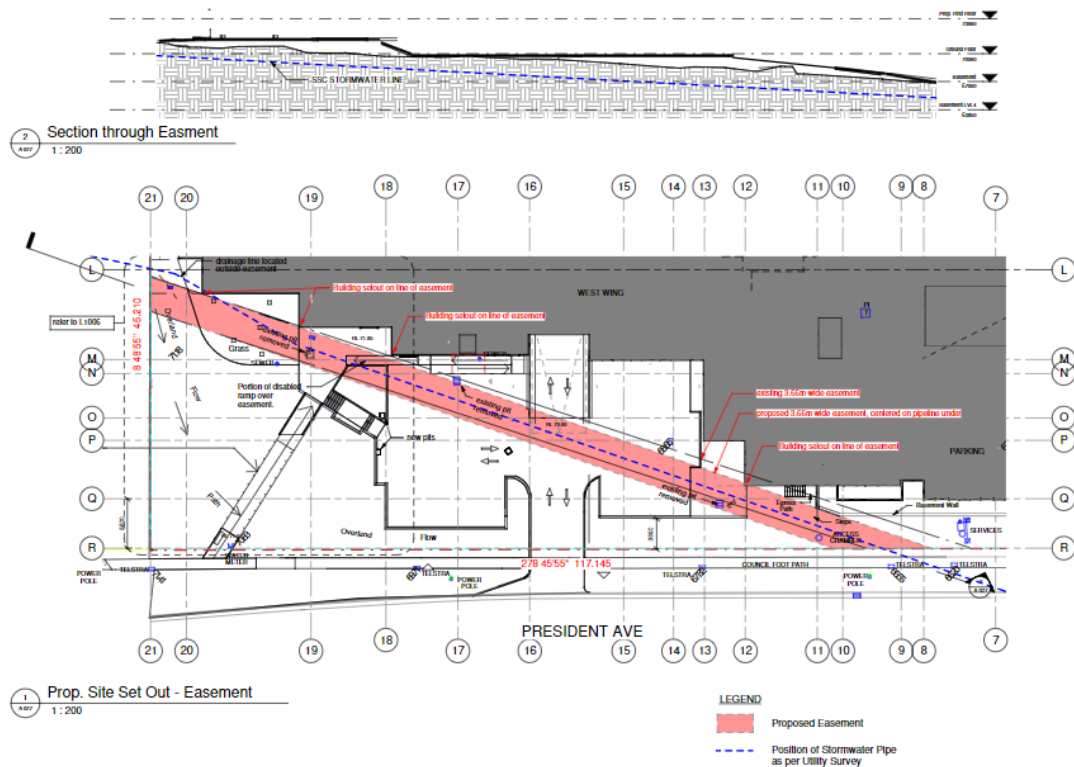
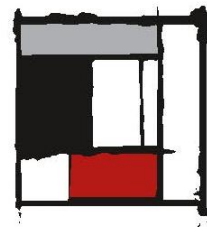


Figure 27: Location of easement

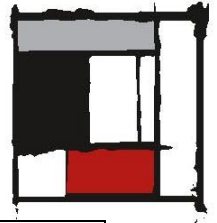
Refer to additional drawing no. A027. This drawing shows the proposed alignment of the proposed easement with respect to the proposed and existing infrastructure. This drawing clearly shows that the proposed easement is located above the centreline of the stormwater pipe.



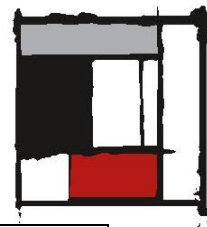
4.0 Considerations of Submissions

4.1 Submissions from Public Authorities

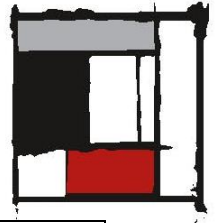
Agency	Matter Raised	Submission	Response
EES	Flooding	A detailed site – specific flood risk management study and emergency management study is required to determine the suitability/ constraints of the site for an intensification of the existing hospital, including basement car parking facilities. The detailed flood risk and impact assessment including an emergency management assessment should be undertaken to determine the flood constraints of the site and the suitability for an intensification of the existing hospital.	A complete Flood assessment has been carried out by Martens and Associates. All modelling data and mapping results are included in the report submitted with this RTS. Refer Section 3.6 Refer Appendix L for Martens Flood Assessment and Modelling and Data. Additional information was requested and provided in Appendix Nd: Utility Survey (Issue B)
EPA		Does not require an environment protection licence under the <i>Protection of the Environment Operations Act 1997</i> .	No further action or response required.
		The EPA has no comments and no follow-up consultation is required.	No further action or response required.
Heritage Council of NSW		The subject site is not listed on the State Heritage Register (SHR), nor is it on the immediate vicinity of any SHR items. The site does not contain any known historical archaeological deposits. Therefore, no further heritage comments are required and further referral for subsequent stages do not need to go to the Heritage Council of NSW.	No further action or response required.



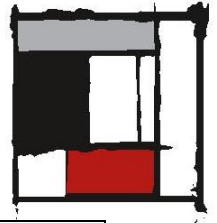
	Hotham House	The proposal includes the demolition of Hotham House, a locally listed item that was previously subject to an Interim Heritage order and subsequently listed by the Sutherland Shire Council and backed by extensive public support. Due to the contentious nature of the listing of Hotham House, it is recommended that the Department undertake detailed consultation with the Sutherland Shire Council prior to the issue of an approval.	Refer Section 3.1 of this RTS Refer to Appendix E
Heritage NSW Aboriginal Cultural Heritage Regulation - South	Review of the EIS, ACHAR and AATR	A systematic subsurface testing program needs to be undertaken in line with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales. An Archaeological Report assessing impacts to any Aboriginal cultural heritage identified during testing needs to be prepared and incorporated into the EIS prior to development approval being issued and to inform future conditions of consent.	Refer Appendix O: Aboriginal Cultural Heritage Assessment Report by Archaeological Management and Consulting Group & Streat Archaeological Services Pty Ltd. Refer to Section 3.13 of this RTS
		Consultation with the Registered Aboriginal Parties (RAP) needs to continue in line with the <i>Aboriginal cultural heritage consultation requirements for proponent 2010</i> .	The ACH Report includes a complete log of all groups and RAPs who were contacted for the study. Refer to section 3.13 of this RTS Refer Appendix O
		Following completion of the subsurface testing program, and assuming project approval is granted, a Cultural Heritage Management Plan will need to be prepared to address unexpected finds and outline any impacts to Aboriginal cultural heritage or mitigation measures required before, during and after construction.	A set of recommendations have been formulated after consultation with the proponent and heritage New South Wales (HNSW). In relation to a cultural Heritage Plan, the report recommends the following: Should any human remains be located during the following development: All excavation in the immediate vicinity of any objects of deposits shall cease immediately



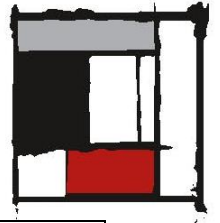
			• The NSW police and HNSW's Enviroline be informed as soon as possible • Once it has been established that the human remains are Aboriginal ancestral remains, HNSW and the relevant Registered Aboriginal Parties will identify the appropriate course of action. Should any archaeological deposits or objects be located during the development: • All excavation in the immediate vicinity of any objects of deposits shall cease immediately • HNSW and a suitably qualified archaeologist should be notified so the significance of the said deposits or objects can be evaluated and presented in a report and the study area recorded as an archaeological site • The archaeological deposits or objects will require the production of an Aboriginal Cultural Heritage Management Plan. Of which the way forward will be subject to recommendations of this report in consultation with HNSW, prior to the development continuing. The requirement for a Cultural Heritage Management Plan can be conditioned into the assessment determination. Refer to Section 3.13 of this RTS
Sutherland Shire Council	Heritage	Council reiterates the following: <i>"The house and garden at 65 Hotham Road have aesthetic significance at a local level as a fine and substantial local example"</i>	Refer to Section 3.1 of this RTS

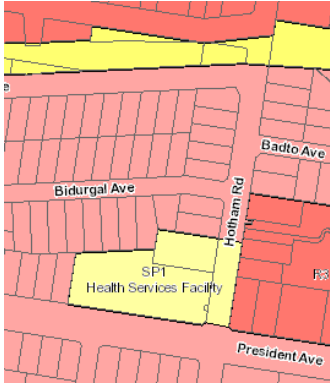


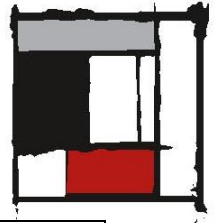
		<i>of a late Federation period house constructed in the Federation Bungalow style, in a garden setting. The Norfolk Pine and circular path contribute to the setting.”</i> The dwelling is proposed to be demolished as part of the new development. The dwelling is being demolished to make way for a driveway. The cottage has local heritage significance and contributes to the streetscape. Given its domestic scale, conserving the cottage can be a strategy to ameliorate the impacts of the hospital scale, creating an interface between the hospital and the residential character of Hotham Road, and can be sympathetically integrated to create a unique and functional entry feature. While the tree fronting Hotham Road is from the 1970's, its location provides a setting to the cottage / farm. Given the heritage value of this dwelling to the local community, Council strongly opposes the demolition of the cottage. The cottage can and should be conserved and integrated into the proposal. Clause 5.10 of the SSLEP2015 supports and encourages the conservation of Sutherland's heritage. The proposed demolition contravenes the objectives of the clause.	
	Urban Design	The proposals modernity and loss of the cottages' almost humble character, will make it even more visually apparent in addition to the significant growth in its size in comparison to the existing facility.	The locality in which the proposed site is located is already in the process of redevelopment. Many of the older humble cottages are being replaced by a mix of modern duplex (such as 59 Hotham Road) and multi-unit residential. The proposed height of the building has been reduced by 1.2m in response to concerns about the height of the project. Refer to Section 3.2 of this RTS Refer Appendix Q



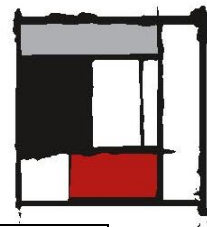
		The privacy impact of multiple elevated windows overlooking these residential properties is of significant concern regardless of any screening devices.....compounded by noise generated from the proposed roof top plant areas.	Refer to the response provided for item 3.4 of this response. Changes have been made to the windows to ensure that privacy impact can be minimised. Roof top plant areas have been moved away from adjacent properties to minimise the noise impact. These plant areas are either enclosed or have been designed with sound baffling material to further reduce the noise impact on neighbouring properties. Refer to Section 3.4 of this RTS An acoustic impact report was provided in response to the SEARS requirements. This report included the mitigating measures necessary to maximise noise privacy for neighbouring properties.
		The proposed external presentation and character of the design is very defensive and overwhelmingly dominant. Particularly to the corner of President Ave and Hotham Road where a solid wall of some 3m high addresses the corner and extends along President Ave. This is highly visible and defensive on such a prominent corner and leaves little ability for passive surveillance of the public way.	This corner is occupied by patient lounges which overlook the area and provide passive surveillance. A balcony is positioned at this point at ground floor level off the patient lounge to address the street corner. The location of the existing electricity sub-station made it difficult to locate other uses at street level. Refer to Section 3.2 of this RTS Refer Appendix Q
		Some design consideration should also be given to the top level of the taller building portions to provide a visual termination to the building heights of those parts.	The height strategy for the design of the building maintains a proportionate height relationship with adjacent buildings. Setting some areas taller in the hope of achieving an appealing



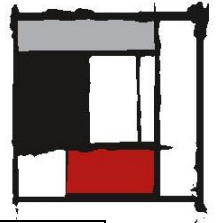
			skyline silhouette did not form part of the design of the development. The design was assessed by the GAO design review panel and found to be appropriate to the locality. Particular attention was paid to the corner of President Ave and Hotham Rd by the GAO. Refer Section 3.7 of this RTS
		The President Private Hospital is not in a medical precinct, inner city or commercial area, it is in a low-density residential area. The design, including the loss of the heritage cottage, shows little regard to its context within the community. The extent of the proposed development appears to be excessive for the available site area and results in a dominant building form unsympathetic to virtually all its neighbours and the streetscape character of the locality.	 President Private House is located with an SP1 Zone (shown in light yellow on Council's LZM Mapping) As set out by Sutherland Shire Local Environment Plan 2015. The SP1 Zone is to provide for special land activities , such as public or private land infrastructure. The Land Zoning Map identifies the specific purpose of the SP1 zone. The purpose designated on the map is permitted with consent, including any development that is ordinarily incidental or ancillary to that use. The proposed site adjoins zones R2 (low density residential and R3(medium density residential) Special consideration has been given to the areas of the



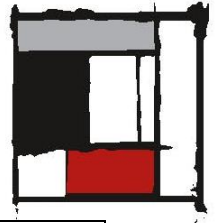
			proposal which adjoin these zone boundaries. Building use and height in these residential zones are very close to being within requirements of the LEP. Refer to Section 3.2 of this RTS
	Flood Risk Management	Several errors were identified in the report that may change the outcome of the flood assessment. These are:	
		1. The catchment area measured used for the hydrological assessment has failed to include the catchment from the brick pit precinct.....Therefore the assessment has underestimated flows arriving at the site and possibly underestimated flood levels.	Refer to Appendix L: L1907286JR02V01 211215a By Martens Refer to Section 3.6 of this RTS
		2. The assessment has assumed a 1050mm dia stormwater pipe within the site whereas Council records show a 1200mm dia, pipe. Further information on this should be provided.	Refer to Appendix L: L1907286JR02V01 211215a By Martens. Pipe sizes have been confirmed by survey Refer Appendix Na & Nd. This confirms the council records are incorrect. Refer to Section 3.6 of this RTS
		3. The critical storm duration estimated for the hydrology model is too low.	Refer to Appendix L: L1907286JR02V01 211215a By Martens Refer to Section 3.6 of this RTS
		4. The hydraulic model does not account for Council's requirement for all inlet pits to be assumed 50% blocked.	Refer to Appendix L: L1907286JR02V01 211215a By Martens Refer to Section 3.6 of this RTS
		5. The flood maps show flooding of the proposed car park in the PMF. Given the proposed development is an essential facility, greater protection from flooding is required. Hence, the basement driveway crest must be raised to the PMF level.	Refer to Appendix L: L1907286JR02V01 211215a By Martens Refer to Section 3.6 of this RTS



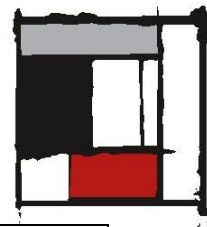
		6. The flood different map does not definitively show that the development does not result in offside flooding impacts. The flood difference maps should be provided with levels in 0.01m increments. Council considers any offside flood impacts greater than 10mm to be unacceptable.	Refer to Appendix L: L1907286JR02V01 211215a By Martens Refer to Section 3.6 of this RTS
		7. For the preliminary flood emergency response plan (Section 5) the report incorrectly states that the northern car park and Hotham Road are unaffected by flood waters, and recommend evacuation to the north during a flood event.Consideration should be made to the expected duration of flooding and risks of evacuation versus refuge on site.	Refer to Appendix L: L1907286JR02V01 211215a By Martens Refer to Section 3.6 of this RTS
		8. The report should include a map showing flood levels that correspond with each proposed building element. The finished floor level should be determined based on the flood level most representative of the building location.	Refer to Appendix L: L1907286JR02V01 211215a By Martens Refer to Section 3.6 of this RTS
		9. The existing conditions versus the proposed conditions do not appear consistent.....The report should include more information about the assessment of P.O. lines from the model from the model at critical locations, particularly at the south western corner of the site.	Refer to Appendix L: L1907286JR02V01 211215a By Martens Refer to Section 3.6 of this RTS
		10. The flood maps show high hazard flooding of the proposed car park at PMF. Given the nature of the development, the open car park should be elevated so that it is not exposed to hazard causing	Refer to Appendix L: L1907286JR02V01 211215a By Martens Refer to Section 3.6 of this RTS



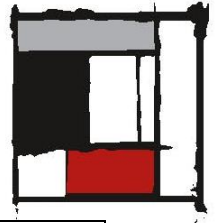
		damage to vehicles, hence should not fall within a hazard category higher than H2.	
		11.The crest of the driveway providing access to the basement should be elevated to the PMF level to provide additional protection.	Refer to Appendix L: L1907286JR02V01 211215a By Martens Refer to Section 3.6 of this RTS
		12.Details of the proposed channel / swale should be provided and must be consistent with what has been modelled. Additional consideration should be made to continuing the channel to the east toward the intersection at Hotham Road and President Ave.....This would reduce the risk of life and property damage within President Ave. The applicant should consult the SES and NSW Police to confirm that this would assist during a flood emergency.	Refer to Appendix L: L1907286JR02V01 211215a By Martens Refer to Section 3.6 of this RTS Channel has been extended to the east as suggested.
		13.The report has not referenced the permissibility of essential community facilities on flood affected land or the objectives of the DCP which should be used to assess the proposed development. The report must provide comment on this aspect.	Refer to Appendix L: L1907286JR02V01 211215a By Martens Refer to Section 3.6 of this RTS
	Trunk Stormwater Damage	The proposal to relocate the easement must be supported by empirical evidence of the location of the existing stormwater pipe including CCTV, site survey, and photographs.	Refer to Appendix N by Australian locating Services Refer to Section 3.6 of this RTS
		The developer must submit for 'access and realignment' to Council's Property Services for relocation of the easement. The application must be approved and all easement registered prior to CC being issued.	An access and alignment application will be submitted on receipt of development consent. The new easement location will be registered prior to any Construction Certificate for



			works in proximity to the easement. This can be made a condition of the determination. Refer to Section 3.14 of this RTS
		The plans show numerous structures over the proposed easement and existing stormwater line. The structures include walls, private stormwater lines and other minor structure. Council will not accept any private structures over its easement.	Such structures already exist and include the Sydney Water sewer main. Proposed garden walls have been relocated so as not to be over the easement. Refer to Section 3.14 of this RTS
	Traffic, Access and Car Parking	As part of the proposed Hospital site expansion, for safety related to increase traffic volume at the president Ave driveway, it is recommended that a slip lane be provided at the President Ave entry to the car park with a separate exit to President Ave for the proposed site. Without a slip lane, access to any significant parking form President Ave is a significant safety concern and will impact traffic on this very busy road. Alternatively, access should be provided off Hotham Road only.	Refer to response to item 3.9 to 3.12 of this document. In summary, this Traffic audit explains that a slip lane divert cars reducing in speed to enter the Hospital Driveway so that they don't slow down traffic on President Ave, create queuing on President Ave or worst of all cause accidents on President Ave. The auditor states that cars are already slowing down to either stop at the set of lights OR slow down for pedestrians OR to turn left into Hotham Road. The -conclusion was that a slip lane was therefore not warranted. Refer Appendix K: P1924.002T President Private Hospital Assessment of Proposed Access driveway
		The applicant needs to undertake a parking survey for similar sized facilities to adopt a parking rate for the proposed hospital site.	Refer to response for Item 3.10 of this document. A comparative study was done with Kareena Private Hospital who have a similar number of patient beds. They provide fewer onsite parking for patients and visitors.
		The proposed parking shortfall of 5 spaces is likely to be greater and is	An additional 7 car parking spaces has been located in the amended design. The location

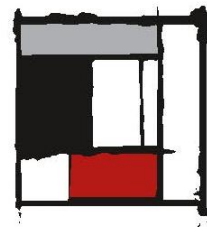


		therefore not considered acceptable.	of each is noted in the response for item 3.10 of this response.
	Landscaping and Tree Protection	The removal of Tree 25 should be reconsidered and integrated into an amended design.	The arborist assessment of this tree was not favourable for this tree. It will be removed as noted on the arborist report.
		Tree 23 should be removed and replaced with a more suitable species for that location.	This tree has been removed at Council's request and replaced with an appropriate species. The landscape plan has been amended accordingly.
		Tree 12 is shown to be pruned back to the trunk and retained for its current habitat hollow only.The tree is a significant endemic remnant of this area and retaining even half of its current canopy will promote its longevity whilst providing enough space for the building to be constructed behind it.	This tree will be retained including the canopy as well at Council's request. The landscape plan has been amended accordingly.
		Tree 10 to be retained	The arborist assessment of this tree was not favourable for this tree. It will be removed as noted on the arborist report.
		Tree 7 is shown to be retained. It is not believed that the levels shown in the architectural plans will allow this to occur. This zone requires 7.2meters of existing ground levels to be retained right round this tree. If this doesn't happen, the tree will not survive the construction works around it. Driveway levels will need to be sympathetic to this tree's root plate if it is to survive.	As confirmed in the arborist report: - Amended driveways are outside of TPZ. Soft landscaping surrounding tree only. - Proposed entry and exit south of tree is close, but outside of 7.2m TPZ - The existing aged building is approx. 8m currently west from tree 7. The proposed edge of the return driveway is shown as 11.5m west of the tree 7 and minimises impacts to T7. - The proposed wheelchair parking north of T7 is approx. 5.0m outside of T7 TPZ



			- The items shown within the TPZ of T7 are softscaping only, reflecting seating and planting and forms part of the landscape submission. - The TPZ of 7.2m from Tree 7 is calculated upon the from boundary line, east This tree will be retained and protected during construction.
			Refer to Appendix V: Landscape drawings for amendments and confirmation that the tree canopy is currently 10% and will grow to 50% after the landscape works are completed.
Transport for New South Wales	Active Transport	The TPIA provided as part of the proposed development does not address TfNSW policies for integrated transport with land use, or the requirements of the Sutherland Shire Development Control Plan (DCP) 2015 regarding off-street bicycle parking and end of trip facilities. It is requested that the applicant amend their proposal and associated TPIA to satisfy the minimum requirements of the Sutherland Shire DCP 2015 in regards to the provisions of end of trip facilities and off-street bicycle parking in accordance with AS 2890.3	The design has been amended to provide an end of trip facility. Refer to the response for item 3.11.
	Travel Demand Management	Prior to the commencement of any operations, a Green Travel Plan (GTP) be submitted to the satisfaction of the Certifier that promotes the use of sustainable transport modes and reduces dependence on single occupant car travel to the site, particularly for staff and visitors.	Refer to response to item 3.12 of this document.

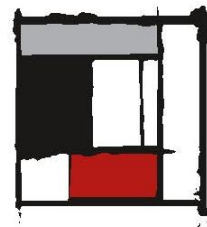
Table 14: Addressing the concerns raised by Public Authorities



4.2 Submissions from organisations

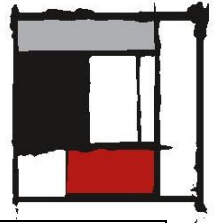
Organisation	Matter Raised	Submission	Response
Sutherland Historical Society		Hotham House has been an important part of Gymea's history for more than a century. Sutherland Shire Historical Society strenuously objects to the plan of its owner Macquarie Health Corporation, a private health organisation, to demolish this iconic structure. Over the years it has had a number of uses and still remains in sound condition. It is a landmark that Sutherland Shire Historical Society and many other local residents do not want to see destroyed. This fine representative example of a Federation-style residence is a significant link to Sutherland Shire history as it was the centre of a large poultry farming enterprise when this was a main primary industry in the district. It was also an important social centre for local people in what was then an isolated area.....Both agriculture and industry themes are evidence in the history of Hotham House. This residence was not only the centre of a large poultry farm, but because of the scale and the innovation of its operation it assumed the semblance of an industrial undertaking.....The theme of commerce, in both its positive and undesirable iterations, is demonstrated in the history of Hotham House.....The themes of leisure and social institutions are demonstrated in the way in which the Hotham House ballroom served as an important social centre in the interwar years.....The theme relating to the development of towns, villages and suburbs, especially the outer suburbs, is relevant to the history of Hotham House.	Over the years Hotham House has previously been given permission to be demolished. The structure is no longer in 'sound condition' as explained in the report provided by MI Engineering. The 'many other local residents' who do not want to see the structure destroyed have not come forward publicly to voice their opinion. As outlined in section 3.1 of this report, a very small percentage of the Sutherland Shire LGA have come forward to place their opinion on record. The themes of agriculture, commerce leisure and society can be celebrated via many physical means such as photos, cultural fun days and the like, they do not have to be a preservation of a building structure. These are claims made in reference to the significance of Hotham House however, they aren't supported by primary source research. Refer to Section 3.1 of this RTS

Table 15: Addressing the concerns raised by Public Organisations



4.3 Submissions from the public

Key Issues Raised	Response
Traffic	Refer to Section 3.9 to 3.12 of this RTS
Increase in traffic would make the immediate area unsafe	Traffic studies have been carried out and measures have been taken into consideration in relation to safety.
Additional traffic would make the congestion at President Ave set of lights even worse	Consideration will be given to staggering start and finish times to mitigate the congestion. A Green Travel plan will be implemented to encourage staff to utilise public transport rather than utilise private vehicles.
Parking	Refer to Section 3.10 to 3.12 of this RTS
Additional traffic should mean more car parking but not enough at present so how will the future numbers be accommodated	A more conservative formula to calculate the number of required car spaces has been utilised for this development resulting in more car parking spaces being provided. Additional parking spaces have been found to exceed the required number of parking spaces. Architectural plans have been amended accordingly. A Green Travel plan will be implemented to encourage staff to utilise public transport rather than utilise private vehicles.
Not enough car parking so people park on the streets	The main entry / exit to the Hospital is located on Hotham Road. Parking on neighbouring streets will therefore be a longer walk. Car parking will not be charged therefore staff and visitors will not be encouraged to park on the street to escape paying for parking.
Streets become unsafe for pedestrians	All pedestrian pathways will be wide, at grade and well lit. Pedestrian crossings will be located at all driveway crossings to ensure pedestrian safety. Footpath to Hotham Rd is improved under the proposal.
Residential character	Refer to Section 3.2 of this RTS
Too big for residential character	Refer to response to item 3.2 of this document.
Noise	Solutions to the questions raised by public submission were addressed in the original EIS
Air conditioning will be too noisy	Roof top plant areas have been moved away from adjacent properties to minimise the noise impact. These plant areas are either enclosed or have been designed with sound baffling material to further reduce the noise impact on neighbouring properties
Construction noise will be uncomfortable	Refer to Construction Management Plan
Heritage (Hotham)	Refer to Section 3.1 of this RTS
Diluting heritage character of Sutherland	Refer to response to item 3.1 of this response
No appreciation for history	Refer to response to item 3.1 of this response
Environmental Effects	
Noise and dust during construction	Refer to the Construction Management Plan
Safety	
More people means more undesirable elements	Refer to CPTED section in the EIS
Anti-social behaviour	Refer to CPTED section in the EIS
Privacy	Refer to Section 3.4 of this RTS

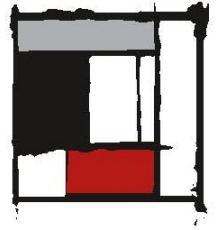


• Can't stand in my back yard without being looked at	Refer to item 3.4 of this response
• I don't want to be looking at sick people all day	Refer to item 3.4 of this response
Poor communications	
• Finding your way around the site	Refer to response on wayfinding and advertising in original EIS
• Being informed about progress	Refer to the Construction Management Plan

Table 16: Addressing the concerns raised by Public Submissions

4.4 Submissions in support

Two (2) submissions supported the proposal, one (1) provided their support outright whilst the remaining listed items for further consideration.



5.0 Conclusion

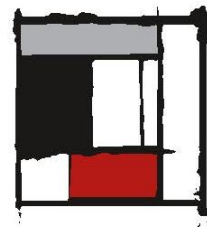
The proposal is to carry out alterations and additions to the existing President Private Hospital. The changes proposed will provide upgraded patient accommodation areas, new services, public outdoor areas and a much needed mental health clinic and ward for the community of Sutherland Shire. The additions will support enhancing services to the area in the way of patient facilities as well as public transport opportunities.

The potential environmental impacts, both direct and cumulative, have been identified and assessed as part of the EIS accompanying the development application. During and after the public exhibition period 62 submissions were received by DPIE. 56 of these submissions were from the public, 1 was from an organisation and 6 from public authorities. This response to submissions examines these submissions in detail and addresses and provides a response to the matters raised. This includes matters that can be addressed by conditions of consent and matters that are to be addressed in the management plans and strategies to be prepared subsequent to approval.

Additional information is provided as requested by the Department of Planning, Industry and Environment to enable the application to be assessed. The proposed development has been specifically designed to mitigate and ameliorate potential impacts and mitigation measures are included in the EIS for this purpose. No change to the mitigation measures are proposed. The assessment concludes that no significant environmental impacts have been identified as a result of the development. Any potential impacts can be satisfactorily mitigated through a range of measures that have been identified within the EIS. In addition, the development is consistent with relevant Government policies and strategies. It is considered that the development is in the public interest and warrants approval.

Imagescape Design Studios

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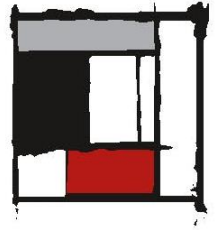
Appendix 1: Supporting Drawings

Architectural Drawings

Drawing No.	Description	Issue No.
A 001	Title Sheet	60
A 016	Construction Phasing	60
A 017	Shadow Analysis – Winter Solstice 9am	60
A 018	Shadow Analysis – Winter Solstice 12 PM	60
A 019	Shadow Analysis – Winter Solstice 3pm	60
A 020	North Line of Site Diagrams	60
A 021	West line of Site Diagrams	60
A 025	Proposed Site Context Plan	60
A 026	Proposed Site Set out Plan	60
A 027	Easement for Stormwater Pipe	60
A 028	West Carpark Detail Plan	60
A 031	Proposed Ground Floor Plan – Expected Internal Light Spill	60
A 032	Proposed First Floor Plan – Expected Internal Light Spill	60
A 033	Proposed Second Floor Plan – Expected Internal Light Spill	60
A 058	Existing Site Light Spill	60
A 060	Proposed Site Light Spill	60
A 102	Basement Plan LVL 3 & 4	60
A 103	Basement Plan LVL 1 & 2	60
A 104	Ground Floor General Arrangement Plan	60
A 105	First Floor General Arrangement Plan	60
A 107	Second Floor General Arrangement Plan	60
A 108	Roof General Arrangement Plan	60
A 300	Street Elevations	60
A 302	West & Entry Elevations	60
A 401	East / West Sections	60
A 402	North / South Sections	60
A 403	Building height	60

Architectural Drawings: Hotham House Retained Option C

Drawing No.	Description	Issue No.
SK 001	Title Sheet	59
SK 025	Proposed Site Context Plan	59
SK 165	Basement Plan – Hotham House Retained	59
SK 166	Ground Floor Plan – Hotham House Retained	59
SK 167	First Floor Plan – Hotham House Retained	59
SK 300	Elevations	59
SK 401	Sections	59
SK 402	Detail Section	59
SK 411	Detail Section	59

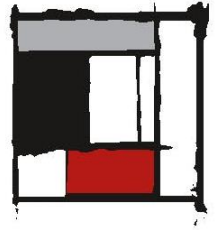


Architectural Drawings: Hotham House Partial Demolition Option D

Drawing No.	Description	Issue No.
SK 204	Ground Floor general Arrangement Plan	59
SK 205	First Floor General Arrangement Plan	59
SK 302	Street Elevation	59
SK 420	Sections	59

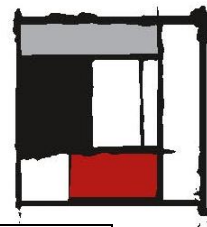
Landscaping Drawings

Drawing No.	Description	Issue No. / Date
L-0000	Coversheet	Issue K: 11/01/22
L-0001	Landscape Concept Diagram	Issue K: 11/01/22
L-1001	Landscape Concept Masterplan	Issue K: 11/01/22
L-1002	Landscape Concept Detail Plan: Hotham House Park	Issue K: 11/01/22
L-1003	Landscape Section: Hotham House Park	Issue K: 11/01/22
L-1004	Landscape Concept Detail plan: Central Courtyard	Issue K: 11/01/22
L-1005	Landscape Section: Central Courtyard	Issue K: 11/01/22
L-1006	Landscape Concept Detail plan: South-Western Corner	Issue K: 11/01/22
L-1007	Landscape Section : South-Western Corner	Issue K: 11/01/22
L-1008	Landscape Concept Detail Plan: Mental Health Courtyard North	Issue K: 11/01/22
L-1009	Landscape Section: Mental Health Courtyard North	Issue K: 11/01/22
L-10010	Indicative Planting Palette	Issue K: 11/01/22

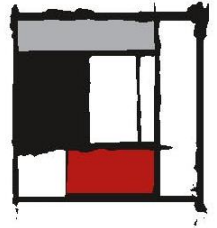


Appendix 2: Supporting Reports

Appendix No.	Title	Author	Date
A.	RTS: App. Aa-DPIE letter received 12-02-21	Department of Planning and Environment	12/02/21
	RTS: App. Ab-DPIE letter received 26-05-21	Department of Planning and Environment	26/05/21
	RTS: App. Ab Attachment to letter 26-05-21	Department of Planning and Environment	26/05/21
	RTS: App. Ac-DPIE letter received 24-12-21	Department of Planning and Environment	24/12/21
	RTS: App. Ad-DPIE letter received 01-02-22	Department of Planning and Environment	01/02/22
	RTS: App. Ad-TTPP peer review	Department of Planning and Environment	
	RTS: App. Ae-DPIE email dated 04-02-22	Department of Planning and Environment	04/02/22
B.	RTS: App. B-Ck200306-200306_President Private Hospital_SDP03-GANSW-Advice_Additional	Government Architects of NSW	04/05/20
C.	RTS: App. C-Structural Inspection Report	MI Engineering	25/07/19
D.	RTS: App. D-BCA Audit into the condition of Hotham House	Blackett, MacGuire + Goldsmith	17/07/19
E.	RTS: App. E-Statement of Heritage Impact-Issue D	GBA Heritage Architects	7/05/21
F.	RTS: App. F-2019-12-02-pln-business-paper relevant pages only	Sutherland Shire Council	02/12/19
G.	RTS: App. G-SYD20216 Electrical Design Intent Statement	ERBAS Pty Ltd	26/04/21
H.	RTS: App. Ha-TCP Pedestrian management on Hotham Road	ML Traffic	25/04/21
	RTS: App. Hb-TCP Truck management on Hotham Road		
	RTS: App. Hc-Hospital Swept bPaths		
	RTS: App. Hd-Swept path for wider driveway to Pres. Ave.		
	RTS: App. H- Traffic and Parking Report 3b		
I.	RTS: App. I-President Private Green Travel plan	ML Traffic	25/04/21
J.	RTS: App. J-Hospital precinct Audit checklist	Imagescape Design studios	29/04/21
K.	RTS: App. K-P1924.002T President Private Hospital Assessment of Proposed Access driveway	Greys Australia	30/03/21

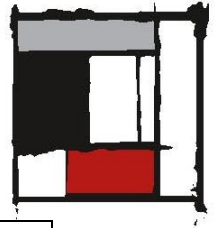


	RTS: App. Ka Proposed Driveway RTS		
L.	RTS: App. L-Flood Study	Martens	December 2021
M.	RTS: App. M-Ck210518-Clause 4.6 variation request	Imagescape Design studios	20/05/21
N.	RTS: App. Na - Utility Survey (issue C)	Australian Locating Services	April 2020
	RTS: App. Nb – ALS CCTV Site Report	Australian Locating Services	April 2020
	RTS: App. Nc – ALS Site Report	Australian Locating Services	April 2020
	RTS: App. Nd - Utility Survey (issue B)	Australian Locating Services	April 2020
O.	RTS: App. Oa-AATR(Final)	Archaeological Management Consulting Group	20/05/21
	RTS: App. Ob-ACHAR(Final)	Archaeological Management Consulting Group	20/05/21
	RTS: App. Oc-Consultation Log(Final)	Archaeological Management Consulting Group	20/05/21
P.	RTS: App. P- 08_0169 Kareena Private Hospital – App. G Traffic Impact Assessment		Dec. 2008
Q.	RTS: App. Q – Urban Design Report		
R.	RTS: App. R – Hotham House retention Options	Imagescape design studios	July 2021
S.	RTS: App. S – Architectural Drawings	Imagescape design studios	Issue 59
T.	RTS : App. T – Architectural Drawings – Option C	Imagescape design studios	Issue 59
U.	RTS: App. U – Architectural Drawings Option D	Imagescape design studios	Issue 59
V.	RTS: App. V – Landscape drawings	Habit8	Issue K
W	RTS: App. W – Non-Unique Public Submissions	DPIE download from portal	
	RTS: RTS Report (Version 4)		Version 4



Abbreviations

ACHMP	Aboriginal Cultural Heritage Management Plan
ACM	Asbestos containing materials
AEP	Annual Exceedance Probability
AHD	Australian Height Datum
ARI	Annual recurrence level
AS	Australian standard
ASS	Acid sulphate Soil
Background Noise level	The ambient sound-pressure noise level in the absence of the sound under investigation exceeded for 90% of the measurement period. Normally equated to the average minimum A-weighted sound pressure level.
BDAR	Biodiversity Development Assessment Report
CCTV	Closed Circuit television
CEMP	Construction Environmental Management Plan
CIV	Capital Investment Value
COPCs	Constituents of Potential Concern
Cumulative impacts	Impacts that, when considered together, have different and/or more substantial impacts than a single impact assessment considered alone.
DA	Development Application
DECC	Department of Environment and Climate Change
DPE	NSW Department of Planning and Environment
DPI	NSW Department of Primary Industries
Drainage	Natural and artificial means for the interception and removal or surface or subsurface water.
EEC	Endangered Ecological Community
EIS	Environmental Impact Statement
EP&A Act	NSW Environmental Planning and Assessment Act 1979
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPA	NSW Environment Protection Authority
EPBC Act	Commonwealth Environment Protection and Biodiversity Conservation Act 1999
ESA	Environmental Site Assessment
ESCP	Erosion and Sediment Control Plan
ESD	Ecologically Sustainable Development
GA NSW	Government Architect NSW
GFA	Gross Floor Area
ICNG	Interim Construction noise Guideline (DECC 2009)
LALC	Local Aboriginal Land Council
LEPs	Local environmental Plans
LGA	Local Government Area
LoS	Level of Service
NML	Noise Management Level



NSW	New South Wales
OEH	Office of Environment and Heritage NSW
PMF	Probable Maximum Flood
POS	Public Open Space
RAP	Remediation Action Plan
Responsible Person	The applicant or proponent responsible for preparing this EIS
RL	Reduced Level
RMS	NSW Roads and Maritime Services (now TfNSW)
RtS	Response to Submissions
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy. A state level environmental planning instrument
SSD	State significant Development
TfNSW	Transport of NSW.