#### **Resident Committee for HKH Redevelopment Project**

Contact Person:Jenna FordPhone:0417 495 862Email:jennaf88@gmail.com

27<sup>th</sup> February 2013

Director General NSW Department of Planning and Infrastructure 23 – 33 Bridge Street SYDNEY NSW 2000

Attention:

Ben Eveleigh

Dear Sir

# State Significant Development Application: Hornsby Ku-ring-gai Hospital Redevelopment Stage 1

#### Application Number - SSD 5356

I refer to the application regarding the abovementioned project as advised in the Department of Planning's letter dated 14<sup>th</sup> January 2013.

Please find the Resident Committee's comments and submissions in relation to the project.

The following key issues are raised by the Committee:

#### Consultation

Whilst there is firm support for the long awaited Redevelopment Stage 1 (Woodhead Architectural Statement V3.0) amongst the resident community who live in the vicinity of the HKH campus, both the design and location of the building has met with concern from residents and affected landowners in the surrounding streets. These stakeholders submit that they were not consulted at an early stage as to the location of the building and that consultation with them commenced after the location of the building and the bulk of its design were in place.

The actual location of the facility itself on the Burdett Street and Derby Road sides of the campus brings with it most of the issues that are raised herein by us. Location on the Palmerston Road side of the HKH campus either directly on that street front or centered adjacent to the existing Lumby Building and across the grounds that now are occupied by old single storey buildings (Pathology and the old Emergency Wards). (See Appendix 1 - Amended Context Analysis Site Plan A)

We submit the following comments and benefits for this alternative location:

- This is an open, level area in the campus with easy access off Palmerston Road to the north.
- The location has excellent access to the Hope Building and operating theatres
- Demolition of only two very old single storey hospital buildings would be required in order to free up sufficient space
- The Stage 1 Redevelopment building itself could be increased to 6 storeys to provide ample floor space to meet the proposed series and facilities.
- A taller building in this location will enable helicopter landing pads to be incorporated to replace the current use of the park and the overland trundling of emergency patients on trolleys via open pathways through the campus.
- Its location would be a centralized hub and its delivery of services to other departments on the HKH site would be more efficient from this location. (Catering, supplies, laundry and waste to and from the new Mental Health facility, the George Lumby Building and the Hope Building)
- Provision of a much safer drive way entrance to the facility than will be the case for the proposed patient, visitor and ambulance entrance on the smaller residential Burdett Street.
- A more suitable entrance for truck deliveries of goods and collection of waste. Palmerstone Road is predominantly not a residential street and issues relating to impacts of industrial noise would be averted.
- Traffic flows to and from the HKH campus would be safer and smoother and, being contained in Palmerstone and Northcote Roads would impact less on the residential streets of Burdett, Derby, Jubilee and Balmoral Streets.
- The relocation of the Stage 1 Redevelopment building fees up space on the south west of the HKH campus for an adequately screened car parking facility
- Impacts on residents caused by the height, bulk, and design and overshadowing of the proposed Stage 1 Development would be largely avoided.

Consequently, the Resident Committee makes a submission to re-site the building to the Palmerstone Road side of the campus. Whilst we understand that this would require amendment to the footprint and thus incur some design costs we submit that it is a site that provides long term

benefits as listed above and that these benefits will provide significant cost efficiencies through time whilst avoiding potentially costly design measures aimed at mitigating against the impacts of the current proposed building's location upon the residents in the surrounding streets. Residents would welcome the opportunity to be able to consult with Health Infrastructure and the Hospital Management in regard to the building's location.

Consultations have been implemented via community information meetings but consultations have been <u>post the crucial location and design stage</u> of this Redevelopment Project. We have been invited to present residents' issues for consideration at a later stage. As reported in the JBA Environmental Impact Statement, Dec 2012 these issues we raised have been discussed and considered. Residents individually and as part of this Resident Committee have raised issues with Health Infrastructure, the Project Design Team, Hospital Management, local council and our State Member Matt Kean on a number of occasions. Amendments to the design that could have addressed the issues raised have largely not been implemented.

Whilst our primary submission is, as above, to relocate the Stage 1 HKH Redevelopment Building, for the reasons stated above, if our submitted solution cannot be implemented, we bring to your attention below the following issues and comments on the proposed Stage 1 HKH Redevelopment as it has been presented to you.

## **Built Form and Urban Design**

As outlined in the Director General's Environmental Assessment Requirements (DGRs) the Development application must address the height, bulk and scale of the proposed development within the context of the locality with specific consideration of the overall site, layout, streetscape, connection with the existing adjacent hospital buildings, axis, vistas, connectivity, open spaces and edges, primary elements, gateways, façade, rooftop, mechanical planet, massing and setbacks, building articulation, materials, choice of colours.

The location of the proposed Stage 1 Redevelopment Project on the south eastern corner of the campus adjacent to the most densely residential streets brings with it impacts on the surrounding residents that are challenging to resolve. In consultations between us and the Project Design Team we have been assured that this location is the only workable one for budget reasons. The committee is concerned firstly that this choice of location on the campus is short sighted and largely unsuitable, for reasons stated above.

To deliver on the stated objective to minimize the building's footprint on the campus site (JBA Environmental Impact Statement, Dec 2012, Sec 1.4) the building has been designed to a height well above surrounding single storey residential housing. The location of the building has been pushed close to the Burdett and Derby Street boundaries of the campus. Whilst there has been some modification of the building height after resident input, so that it tapers from 3 storeys on the Burdett Street boundary to 4 (plus cooling towers) on the northern side of the building, the setback from the Burdett Street footpath is only still 2.3 to 2.9 meters. The visual impact on the streetscape of this building mass rising straight up from close to the campus boundary is significant and its closeness to the footpath precludes the planting of any adequate screening trees. A wider setback would allow for more appropriate taller tree plantings to help maintain residential privacy. It is

important to maintain domestic privacy and mitigate against the overlooking of private spaces from the proposed building and to soften the abrupt change from existing single storey dwellings to the modern 3 storey hospital facility. The environmental impacts of the proposed 3 to 5 storey building apply not only to the immediate residents in Burdett Street, but extend beyond to the residents in streets to the south of the proposed location – Jubilee, Spurgin and Herbert Streets. The ambience and vistas in the surrounding streets would be better preserved by employing wider building setbacks and use of more appropriate taller tree plantings.

The setback from Derby Road street frontage is 21.9 metres, however, this setback zone is proposed to be used for truck deliveries and emergencies generators. As such this is an industrial usage located adjacent to residential housing. This proposed usage of the building setback on the eastern side negates the gains of the proposed 21.9 meter building setback from Derby Road. We note the attention to addressing acoustic impacts upon surrounding residents, hospital staff and patients but make submissions in relation to the current proposed location of the loading further below in this submission.

The Residents Committee considers that there are reasonable grounds for amending the footprint of the proposed building such that setbacks on Burdett Street are relocated in line with current house setbacks on Burdett Street. Additionally, increasing the setback zone on Derby Road such that the building alignment is located on the eastern boundary of existing Lot 4 DP 14774 (being No. 109 Burdett Street which is currently owned privately and yet to be acquired. Increased setbacks allow for taller denser tree plantings that will help reduce negative imposition of the building on the surrounding residents' homes and streets. It will also allow for greater acoustic buffering of loading dock activities.

There is ample space available on the campus for this amendment to the proposed design.

To the west of the proposed building and facing Burdett Street lie four existing old cottages owned by Hornsby Ku-ring-gai Hospital. Three of the cottages currently house hospital run child care facilities and one houses an Audiology unit (Woodhead Architectural Statement V3.0 - Context Analysis Site Plan). Provision of child care facilities for staff is not core service delivery for the hospital. Current children attending in these facilities are 50% children not related to hospital staff. The immediate locality already provides 12 excellent and readily accessed existing childcare facilities. (See Appendix 2). The existing houses could be demolished to increase ground space available for the Stage 1 Redevelopment.

The existing Audiology unit could be easily relocated and the child care facilities closed with minimal impact to core hospital services.

This makes available an estimated additional 250 square meters of ground space into which the new facility could be extended whilst still retaining its functionality and integrity. (See Appendix 1: Amended Context Analysis Site Plan B). Thus would allow for a narrower building, an increased set back from Burdett Street and Derby Road, less overshadowing and visual impact and mre effective planting of trees to provide screening.

Existing entrance way to the car proposed car park and new entrance could be retained as an underpass through the proposed ground floor undercroft (thus maintaining ambulance access to the Hope Building as well as the new facility). Proposed linking connections to the Hope Building would be retained. Levels 3 and 4 have inner voids designed into them that would lend themselves to being moved to accommodate a longer lower building than that proposed. The sterile zones in the upper storeys of the building could be maintained and their location also adjusted to a longer and narrower building shape.

# Building materials and colours

The Environmental Impact Statement (JBA Dec 2012) correctly acknowledged that the existing buildings relate poorly to each other and there is generally an inconsistent development pattern within the HKH campus. The Project Design Team has put attention on blending the proposed building into the existing Hope building (red features) and selected façades that are presented as minimising the visual imposition of the building on the streetscape. The Residents Committee has discussed with the Design Team the use of a plainer brick façade rather than the proposed mix of several materials and colours – orange glazed terracotta tiles, red tiles, dark grey tiles, grey bricks and colour bond roofing. The Committee would prefer a plain and lighter building façade to blend in with existing housing wall colours and residents on Burdett Street are particularly concerned in this regard. We have attached in Appendix 3 a brochure of the Terracade tiling system being proposed by the Design Team. It advertises sound environmentally sustainable features, however, it has a shorter life than brick and would require replacement in the medium term. It is an expensive finish to use, being quoted to us by professionals in the trade as \$350 per square metre installed as opposed to \$150 per square metre installed for bricks.

Whilst the proposed tiles have good thermal properties, the walls they are to be utilized on are predominantly east and south facing and the thermal properties are of less importance in that orientation. The northern and western façades of the proposed building have significant amounts of glazing and are more likely to present challenges to the maintenance of stable temperatures within the proposed facility.

Residents submit that a lighter coloured plain brick finish combined with more extensive tree plantings would more closely match the existing buildings in the locality and would be less of a visual imposition on residents living in the vicinity of the proposed building.

We would also submit that the existing Hope Building's red façade is peeling already and a number of the existing campus buildings are poorly maintained. We have concerns that the proposed finishes to the building would require significant maintenance in the medium term and this would be sensible to avoid where current standards maintenance on the campus have not been demonstrated. Creating a building that requires ongoing maintenance is unnecessary and costly where a plainer finish would be more appropriate.

# Amenity – Solar Access and Overshadowing

Considerable discussion has been undertaken between residents and the Design Team regarding overshadowing of surrounding houses and loss of access to sunlight from the proposed building. The

heights of the proposed original building have been amended to minimize impacts. (Environmental Impact Statement Dec 2012 Sec 6.5.1).

Whilst there are no overshadowing controls applicable to the proposed State Significant Development, the DGR's requires that a high level of amenity for the land uses immediately adjacent and the surrounding residential areas be demonstrated. Adjustments that have been made to the proposed building height and profile by the Design Team have not resulted in any significant reduction of the overshadowing on the surrounding streets and houses from 2.30 pm to 4 pm on the winter solstice. We have submitted overshadowing diagrammes that show the current situation and the situation after the proposed building is completed. This diagramme also provides an illustration that the overshadowing impact under the original design and the current design are virtually the same. (Appendix 4 - Prior Condition, Original, Proposed and Current Overshadowing Effect Diagrammes). Certainly this is not minor overshadowing of 2 residential yards as claimed in the Environmental Impact Statement December 2012- 6.5.1.

Whilst the Stage 2 Redevelopment Plans are not the subject of this DA, residents are extremely concerned that, as the proposed Stage 2 of the HKH Redevelopment involves a continuation down Derby Road of a building of similar height, mass and setback, issues arising from Stage 1 will be compounded in Stage 2 and this should be addressed at this stage. The likely extended overshadowing effect will impact a greater number of residents in addition to those affected by the current proposed building height and location. The location of Stage 1 building sets the precedent for location of the Stage 2 building and, because of this, we submit that an adjustment to the height and setback of the Stage 1 building is important. There has been a lack of public disclosure for the nature of the Stage 2 Redevelopment and this is of great concern.

The Residents Committee would submit that the above suggested increase in building setback from the Derby Road Street frontage would lessen the impact of loss of access to sunlight and establish a building alignment for Stage 2 that would better preserve community well being and the ambience and quality of life of those living in the surrounding streets.

#### Noise

DGRs requires that the HKH Redevelopment Stage 1 Development application outline measures to minimise and mitigate against potential noise impacts on the surrounding occupiers of the land. The Residents Committee raises the following issues.

<u>Cooling Tower and Plant Rooms</u>: DA Acoustic Assessment Report (Section 6.1) recommends that orientation of plant room and equipment should be aimed away from the nearest affected receivers. The nearest affected receivers are hospital buildings 17 metres to the north. Resident Committee submit that the intakes and exhausts from these plant rooms not be directed to Burdett Street to the South or Derby Road to the East.

The DA Acoustic Assessment Report recommends mitigation measures for minimizing noise levels in cooling towers on Level 3 and recommends conditions of operation for plant rooms located on levels 4 and 5. Residents Committee would strongly support stringent compliance with these conditions of **6** | P a g e

operation and a mechanism for monitoring that Hospital Management implements these conditions into the future.

<u>Stand by Generator:</u> DA Acoustic Assessment Report recommends mitigation measures for minimizing noise levels from the standby generator including regular maintenance, limiting its maintenance operation to one period per hour and only between 7am and 6 pm. The siting of the standby generator on the corner of Derby and Burdett Street directly opposite resident housing is inappropriate in terms of minimizing impacts of noise on the surrounding landowners particularly on occasions when the standby unit is operating for extended periods due to power outage. We ask for a more appropriate location and suggest this be towards the north western side of the undercroft of the proposed building and close to the existing campus maintenance workshop.

## Noise impact from Loading Dock activities:

Operational procedures recommended in the DA Acoustic Assessment Report (Section 6.6) are welcome. Current procedures appear to allow deliveries and truck use of intrusive reverse warning indicators during the pre-dawn hours and it is reasonable to request assurances that the Acoustic Report recommendations regarding loading dock operations being limited to hours between 7 am and 6 pm and that these have standards that can be monitored and enforced into the future. The submission for an increased setback of the loading zone from Derby Road (with increased density of tree planting and screening) has been made above and would assist in mitigating against industrial noise. We request consideration for a relocation of the loading zone facility to the undercroft of the building. This has been discussed with the Design Team but passed over because of the Design Team's considerations around limitations of turning circles required by trucks. From observation by residents large trucks do currently manage to make maneuvers and safe deliveries via the existing Derby Road entrance to locations within the HKH campus and we submit that the loading docks be relocated to the undercroft of the new building and the old single storey shed to the north of the proposed building be removed to provide greater room for trucks turning into the new facility.

# **Transport and Accessibility**

The DGR's require measures to be taken to address any parking shortfalls as a consequence of the development proposed.

The Residents Committee submit that figures related to parking are inconsistent with the car parking studies that we have carried out over the last year. We have conducted 3 full surveys at different times over the last 9 months. The provision of on campus parking is inadequate at present and the ongoing use of on street parking by hospital staff consistently prevents residents in the streets surrounding the campus from receiving deliveries and visits from family and friends who cannot find parking nearby. In our recent community meeting grave fears were expressed by the residents attending for the safety of their children and families. Traffic in surrounding streets it often fast moving and choked by heavy parking on both sides of the narrow streets. We are alarmed and submit that the expert's Traffic Report is seriously flawed. The Environmental Impact Statement (Sec 6.9.2) estimates an additional 100 car spaces will be needed on completion of Stage 2 bringing

the on campus demand to 795 car spaces in total. It is stated that, currently the HKH campus provides 340 parking places and proposes to supply 495 on completion of the Stage 1 Redevelopment. The Environmental Impact Statement and the Transport Assessment Report both report 300 street parking places are presently relied on by the hospital and the situation will be the same on completion of the Stage 1 Redevelopment. We submit in Appendix 5 our most recent parking survey. The survey shows 508 more cars parking on the streets surrounding the HKH at 1.30 pm on a weekday than at 6 am in the morning. This pattern is consistent and indicates a level of hospital parking on the streets well in excess of the figures reported in the Environmental Impact Statement. As the building of a multi-storey car park on the campus is projected for 2021 we submit that a more robust solutions to hospital parking be implemented in the meantime. The construction phase of the Redevelopment will bring additional traffic into the area and require concrete strategies to manage on street parking adequately. We cannot see where this issue has been addressed in the Environmental Impact Statement except in the broadest of terms of the Transport Assessment Report.

We submit that there will be more serious parking issues during the construction period unless interim measures are adopted. There are no disincentives for hospital staff to continue to park on the streets or travel to work in cars and almost exclusively with one person per car. There are also pervasive underlying and long term environmental impacts with this type of commuting behavior. We recommend that Hospital Management be required, as a condition of the Stage 1 Redevelopment, to implement immediate and strong programmes for incentivising staff to change their behavior and the Hospital Management be held accountable to specific performance indicators that demonstrate a reduction in staff cars parking on residential streets surrounding the HKH campus. We suggest some of the options below.

# Non car transport options:

As stated above, currently hospital staff relies heavily on on-street parking to the detriment of the existing residents and that this will also exacerbate parking problems during construction periods.

We recommend that the hospital target reducing its staff usage of cars by 50% over the current year through a range of incentives, strategies and educational measures. This will be critical for successful management of work flows during the construction period of Stage 1 and in the post construction period.

Staff commuting by public transport or evidencing car pooling if they do bring a vehicle into the area could be incentivized with a \$50 per week travel allowance and a green award for contributing to the reduction of greenhouse emissions in the environment.

We submit that there are organisational psychologists who specialize in implementing cultural and behavior change in staff and that it would be appropriate for Hospital Management to consult urgently with such specialists to develop solutions for the on street parking problem. This incentivisation of staff would free up on street parking. The HKH campus can be easily accessed by public transport (buses linking key railway stations) and by walking from stations, by riding of bicycles and by cars that carry more than one person. Without the implementation of KPI's and behavioral change initiatives by the HKH these transport options will be underutilised and friction continues with many residents concerning competition for parking places during the week days.

Willingness to car pool or commute to work by public transport could also be a precondition of employment for new staff.

## Conclusion

Whilst the proposed development stands to benefit the community in Hornsby and the wider Sydney northern region with health, social and economic benefits, there are distinct environmental impacts on the surrounding community from the Redevelopment Stage 1 and impending Stage 2. Residents have submitted that they consider the siting of the building to be problematic and less than optimal and that the location to be reconsidered. These issues mentioned above have relevance only if the Stage 1 Redevelopment project proceeds on the proposed location at the south eastern corner of the campus. In the interests of our community and we would like them addressed.

The issues all pertain to maintaining environmental amenity for existing residents and land owners whilst contributing to a higher efficiency and a better quality design outcome for this campus and this is in the interest of the wider community.

If you have any questions regarding the above submission or wish to discuss issues raised above, please contact Jenna Ford as a representative of the Residents Committee.

This submission has been made by the Resident's Committee:

Helen Schyvens

Gerard Schyvens

Bruce Elson

Margaret Smith

Leonie Coward

Jenna Ford

The above residents complete the online declaration as a group.

The following residents have signed in support of this submission:

Name	Address	Signature
Jenna Ford	4 Derby Rol, Horns	by de FED.
Helen Schyvens	6 PERBY RA, HORN	say thempleto
Gerry Schyvens		f. J. chysens
Name	Address	0 Signature

Margaret Smith Bruce Elson Leonie Coward VINOD RAJPUT DAVIDPHILLIPS HEATURE PLUCEPS PATRICIA REARINS CARALEL TWY 0000 BILL - KATHY COUSINS RAR GARTT CROWINY TRUDY BRUINS JULIA PEREZ PAUL CANTLELL LEONARD DROHOBY CLER Nigel Took BRIGIDWRIGHT BARBARA GETER GRACE DING Richard Dig

82 BUADETT. ST. HORNSBY. 31 PALMERSTON KE WARTARA 90 BURDETT ST. HORNEOU 92 Burdett St, Wahroonga 1A Spurgin St Wahroonga 21 1 A Spropin St. Walkoorp 22 JUBILES ST. WAHROONGA 12 C BURDERT 581 28 DERBY 14 DERBY RD 124 DURDETT STR WANROULA PALMERSTAL 9/20-22 PALMEROTON RD WALTARA 7 Spurger Street watronga 96 BURDET STREET, WATHROONGA BLIGISLUDIGL ISA JUBILEB ST WAHROON 6A 112A Kandett St, Walkongo 112A Burdett St. Wahroonso

PAUL LEAVER VICKI LEAVER 19my Kocheleien ackie Saketi Name Patrick Cher Kathonin Laks SAM ZONCA ictor Zoncd. Betty Koh Michael Koh J.A.Ehson ELWAN MULLER WINSOMS GALINGRIDGE EDITY Care Amanda Nagappan Raj Nagappan

.....

.....

17 0 12 Honst Devby Rd Horash 8 Derby Kd Hornsl Address Derton 10 Perm 10 AL MOR. almoral Burd 115 St MKol Burdett St 115 31 PACMERSTON de AS 18 DERBY RD HORNSB) 93 BALMORAL S 93 3 Lowe Rd Hor 3 Lowe Rd Homsby