

①

Diary from [redacted] to Simon Truong on 03/01/2012Diary against Annex [Website Submissions](#) for job [#4508 MP 11_0009 Miranda Dental Hospital](#)

Submission Details for

Email Details

Received 6:50PM, Tue 3rd Jan, 12
Status Actioned on 03/01/2012
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 📢
Class General Details

Interactions

👤 Contacts (1)

Inbound email from:

👤 Staff (1)

Email to:
[Simon Truong](#)

Disclosable Political Donation: no

Name:
Email:Address:
[redacted]
[redacted]Content:
This building is way out of proportion for the location. 3 levels above ground maximum.IP Address:
Submission: Online Submission from [redacted] (object)
https://majorprojects.affinitylive.com/?action=view_diary&id=25241Submission for Job: #4508 MP 11_0009 Miranda Dental Hospital
https://majorprojects.affinitylive.com/?action=view_job&id=4508Site: #2445 84-86 Kiora Road, Miranda
https://majorprojects.affinitylive.com/?action=view_site&id=2445

2

Diary from John Walsh to Simon Truong on 19/12/2011

Diary against Annex [Website Submissions](#) for job [#4508 MP 11_0009 Miranda Dental Hospital](#)

Submission Details for John Walsh

Email Details

Received 6:51PM, Mon 19th Dec, 11
Status Actioned on 19/12/2011
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 📧
Class General Details

Interactions

👤 Contacts (1)

Inbound email from:

[John Walsh](#) - dental surgeon
daddent40@hotmail.com

👤 Staff (1)

Email to:

[Simon Truong](#)

Disclosable Political Donation: no

Name: John Walsh
Email: daddent40@hotmail.com

Address:
67 Lansdowne Street

PENSHURST, NSW
2222

Content:

As a long time dental practioner in Miranda (34 years) I see no need to potentially swamp this suburb with dental patients who will travell from all over Sydney to the proposed hospital. Parking is already a major problem and I feel extra staff and patients will cause hardship to all commercial enterprises in the vicinity by making the parking issue worse. Miranda is already well served by medical/dental professionals. Traffic flow adjacent to Westfield will be spoiled by the increase generated.

IP Address: 124-169-31-202.dyn.iinet.net.au - 124.169.31.202
Submission: Online Submission from John Walsh (comments)
https://majorprojects.affinitylive.com/?action=view_diary&id=24784

Submission for Job: [#4508 MP 11_0009 Miranda Dental Hospital](#)
https://majorprojects.affinitylive.com/?action=view_job&id=4508

Site: [#2445 84-86 Kiora Road, Miranda](#)
https://majorprojects.affinitylive.com/?action=view_site&id=2445

(3)

Diary from [redacted] to Simon Truong on 07/01/2012Diary against Annex [Website Submissions](#) for job [#4508 MP 11_0009 Miranda Dental Hospital](#)

Submission Details for [redacted]

Email Details

Received 12:23PM, Sat 7th Jan, 12
Status Actioned on 07/01/2012
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 📬
Class General Details

Interactions

👤 Contacts (1)

Inbound email from:

[redacted]

👤 Staff (1)

Email to:

[Simon Truong](#)

Disclosable Political Donation: no

Name:

Email:

Address:

Content:

The Miranda public transport interchange is a significant piece of public transport infrastructure that would be negatively impacted by this proposal. The Miranda interchange provides a key link for buses, taxis and train services and is likely to grow in importance in future as there is the potential for additional public transport services. Large numbers of pedestrians, including commuters and shoppers, move between the interchange and the railway station, and road safety would potentially be compromised.

IP Address:

Submission: Online Submission from [redacted] (object)
https://majorprojects.affinitylive.com/?action=view_diary&id=25268

Submission for Job: [#4508 MP 11_0009 Miranda Dental Hospital](#)
https://majorprojects.affinitylive.com/?action=view_job&id=4508


Site: [#2445 84-86 Kiora Road, Miranda](#)
https://majorprojects.affinitylive.com/?action=view_site&id=2445

④

Diary from to Simon Truong on 16/01/2012Diary against Annex [Website Submissions](#) for job [#4508 MP 11_0009 Miranda Dental Hospital](#)

Submission Details for .

Email Details

Received 8:59PM, Mon 16th Jan, 12
Status Actioned on 16/01/2012
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 
Class General Details

Interactions

Contacts (1)

Inbound email from:

Staff (1)

Email to:

[Simon Truong](#)

Disclosable Political Donation: no

Name:
Email: pAddress:
rdContent:
the submission is attached belowIP Address:
Submission: Online Submission from (object)
https://majorprojects.affinitylive.com/?action=view_diary&id=25419Submission for Job: #4508 MP 11_0009 Miranda Dental Hospital
https://majorprojects.affinitylive.com/?action=view_job&id=4508Site: #2445 84-86 Kiora Road, Miranda
https://majorprojects.affinitylive.com/?action=view_site&id=2445

Attachments (1)

94.17 KB

[i-01-2012.pdf](#)

Hospitals . 84-86 Kiora Road, Miranda . Jobs . MP 11_0009 Miranda Dental Hospital . Web Submissions

Submission objecting to the building of the Miranda Dental Hospital
I object on a few grounds.

The obvious ones are floor space ratios related to the small parcel of land and the issue of lack of parking in the Miranda area and that this proposal does not have enough patient car parking thus increasing the strain on current parking in the area.

I have read the proposal and am concerned about inadequate research into the justification of the size of the project for this area.

1/It mentions five rail lines coming into the area. I believe there to be one; south to Cronulla and north to Sydney CBD. If they are partly basing need for such a development on current infrastructure (five rail lines) then obviously less people come to the area than they anticipate.

2/Mention is made of an orthodontist practising from the current premises. There is no orthodontist on the current premises. It is a change of use rather than an extension of current use.

3/the proposal comments on the largely retail nature of this part of Miranda and the undersupply of dentists in the area.

Urunga Parade and Gibbs St are filled with medical and dental general practitioners and dental specialists.

I have worked as a dentist in Gosford (Central Coast) where there was an undersupply of dentists. Consequently, my appointment book was fully booked weeks in advance. This has not been my experience in Miranda. My appointment book is running at approximately 60% capacity. When I began in Miranda I had an arrangement with a neighbouring dentist that he would send his emergency patients to me when he was unable to accommodate them. These calls came approximately three times per week. Since the GFC the calls have reduced and number about one call per month. Anecdotally, my colleagues talk of spaces in their appointment books sometimes related and sometimes unrelated to the GFC

4/The proposal talks of services being offered at the hospital that is unique to the proposed practice. These include educating the public of their dental needs and health and the servicing of the public for those that are part of Veteran Affairs, The Teen Dental Plan and The Medicare Based EPC scheme.

These are services not unique to the proposed plan as I and a number of my colleagues offer all of these services.

These errors in research question the justification for such a large project in this area.

(5)

Diary from to Simon Truong on 18/01/2012Diary against Annex [Website Submissions](#) for job [#4508 MP 11_0009 Miranda Dental Hospital](#)

Submission Details for

Email Details

Received 5:46PM, Wed 18th Jan, 12
Status Actioned on 18/01/2012
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 📢
Class General Details

Interactions

👤 Contacts (1)

...ound email from:

👤 Staff (1)

Email to:

[Simon Truong](#)

Disclosable Political Donation: no

Name: ,

Email:

Address:

NSW

Content:

Well overdue facility for the Southern Suburbs. Having a general anesthetic operating theater in Miranda is brilliant. It will save countless hours travelling to the city or Westmead for dental treatment to my disabled nephew and our family and it will be open 7 days!!

IP Address:

Submission: Online Submission from (support)

https://majorprojects.affinitylive.com/?action=view_diary&id=25472Submission for Job: [#4508 MP 11_0009 Miranda Dental Hospital](#)https://majorprojects.affinitylive.com/?action=view_job&id=4508Site: [#2445 84-86 Kiora Road, Miranda](#)https://majorprojects.affinitylive.com/?action=view_site&id=2445

6

Diary from Louis McGuigan to Simon Truong on 21/01/2012

Diary against Annex [Website Submissions](#) for job [#4508 MP 11_0009 Miranda Dental Hospital](#)

Submission Details for Louis McGuigan

Email Details

Received 10:54AM, Sat 21st Jan, 12
Status Actioned on 21/01/2012
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 🧑
Class General Details

Interactions

🧑 Contacts (1)

Inbound email from:

[Louis McGuigan - Medical Practitioner](#)
louis@crpsydne.com.au

🧑 Staff (1)

Email to:

[Simon Truong](#)

Disclosable Political Donation: no

Name: Louis McGuigan
Email: louis@crpsydne.com.au

Address:
95 Kareena Rd Miranda 2228

Miranda, NSW
2228

Content:

I think this will be an excellent addition to the medical/dental facilities in this area. The surgery now needed for dental care requires sophisticated equipment and backup. To have a purpose built facility in this area would be very useful and much safer for patients rather than having these procedures done in small isolated converted business offices which is currently the case. Furthermore the area where this office is to be built is currently a bit of an eyesore and its removal may be a welcome change.

IP Address: 210-215-139-142.lnk.nexon.com.au - 210.215.139.142
Submission: Online Submission from Louis McGuigan (comments)
https://majorprojects.affinitylive.com/?action=view_diary&id=25529

Submission for Job: [#4508 MP 11_0009 Miranda Dental Hospital](#)
https://majorprojects.affinitylive.com/?action=view_job&id=4508

Site: [#2445 84-86 Kiora Road, Miranda](#)
https://majorprojects.affinitylive.com/?action=view_site&id=2445


7

Diary from Roslyn Morton to Simon Truong on 23/01/2012

Diary against Annex [Website Submissions](#) for job [#4508 MP 11_0009 Miranda Dental Hospital](#)

Submission Details for Roslyn Morton

Email Details

Received 2:58PM, Mon 23rd Jan, 12
Status Actioned on 23/01/2012
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 
Class General Details

Interactions

Contacts (1)

Inbound email from:

[Roslyn Morton - Sutherland Shire Community Transport](#)
manager@sutherland.org.au

Staff (1)

Email to:

[Simon Truong](#)

Disclosable Political Donation: no

Name: Roslyn Morton
Email: manager@sutherland.org.au

Address:
P O Box 303

Engadine, NSW
2233

Content:
Sutherland Shire Community Transport provides transport to medical and social venues for clients who reside in Sutherland Shire and who are frail aged, disabled or transport disadvantaged.

The building of a large dental facility in Miranda will be of great benefit to the local community. However, this part of Miranda is already highly populated with medical facilities and parking is at a premium. Our drivers, many of whom are Volunteers, often have difficulty in finding suitable parking to allow the client to exit the vehicle safely. This becomes an even greater problem when clients require support to gain access into the building.

Our request is that some provision for short term parking be made at this new facility or that Community Transport vehicles have access to the underground parking proposed for the site.

IP Address: 218-215-54-238.people.net.au - 218.215.54.238
Submission: Online Submission from Roslyn Morton (comments)
https://majorprojects.affinitylive.com/?action=view_diary&id=25548

Submission for Job: [#4508 MP 11_0009 Miranda Dental Hospital](#)
https://majorprojects.affinitylive.com/?action=view_job&id=4508

Site: [#2445 84-86 Kiora Road, Miranda](#)
https://majorprojects.affinitylive.com/?action=view_site&id=2445

**Diary from** to Simon Truong on 23/01/2012Diary against Annex [Website Submissions](#) for job [#4508 MP 11_0009 Miranda Dental Hospital](#)

Submission Details for

Email Details

Received 6:38PM, Mon 23rd Jan, 12
Status Actioned on 23/01/2012
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 🚦
Class General Details

Interactions

👤 Contacts (1)

Inbound email from:

S

👤 Staff (1)

Email to:

[Simon Truong](#)

Disclosable Political Donation: no

Name:

Email:

Address:

Content:

A project of this scale is very desperately needed in the regional areas of NSW where dental care is critically needed yet in extreme short supply. Perhaps with a little bit of government assistance it could be more appropriately allocated and directed. I do not see it greatly benefiting the local area as the district is already deeply saturated with a broad spectrum of dental services and providers. If anything it is only likely to deeply harm the local business community.

IP Address: 62.11.11.11

Submission: Online Submission from: (object)

https://majorprojects.affinitylive.com/?action=view_diary&id=25556

Submission for Job: #4508 MP 11_0009 Miranda Dental Hospital

https://majorprojects.affinitylive.com/?action=view_job&id=4508

Site: #2445 84-86 Kiora Road, Miranda


https://majorprojects.affinitylive.com/?action=view_site&id=2445

9

Diary from [redacted] to Simon Truong on 29/01/2012Diary against Annex [Website Submissions](#) for job [#4508 MP 11_0009 Miranda Dental Hospital](#)

Submission Details for

Email Details

Received 11:35AM, Sun 29th Jan, 12
Status Actioned on 29/01/2012
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 
Class General Details

Interactions

Contacts (1)

Inbound email from:

Staff (1)

Email to:
[Simon Truong](#)

Disclosable Political Donation: no

Name:
Email:

Address:

Content:

Urunga parade /Kiora Road is an extremely busy intersection. There is an exit from Westfields shopping centre, the main delivery entrance and exit from Westfield's centre, another exit around the corner feeding more traffic into the area in Kiora Road and around the immediate corner in Jackson Avenue, at the the same location there is Miranda train station and drop off point for commuters, there are special event show buses and normal bus stops , entry and exit for several buildings and the proposed entrance will coincide with the adjacent offices where there is already busy traffic. There is already limited parking 10 minutes only. This private clinic (and not a community hospital it is attempting to portray itself as) with 30 dentists 80 staff and at least 3 times that number of patients and ancilliary people will create untenable congestion. Even if sufficient parking is provided which it is not there will be unreasonable and risky congestion to access and depart the entrance and exits. I am also unhappy that probity may not have been observed with the distribution of a brochure from Flagship communications where submissions are to have equal import if sent to you directly or to them. Is this a state government ratified submission process or altering the course of the submission process?

IP Address:

Submission: Online Submission from [redacted] non (object)
https://majorprojects.affinitylive.com/?action=view_diary&id=25690

Submission for Job: [#4508 MP 11_0009 Miranda Dental Hospital](#)
https://majorprojects.affinitylive.com/?action=view_job&id=4508

Site: [#2445 84-86 Kiora Road, Miranda](#)
https://majorprojects.affinitylive.com/?action=view_site&id=2445

(10)

Diary from / to Simon Truong on 29/01/2012

Diary against Annex [Website Submissions](#) for job [#4508 MP 11_0009 Miranda Dental Hospital](#)

Submission Details for ^

Email Details

Received 5:33PM, Sun 29th Jan, 12
Status Actioned on 29/01/2012
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 📢
Class General Details

Interactions

👤 Contacts (1)

Inbound email from:
[Dental surgery](#)

👤 Staff (1)

Email to:
[Simon Truong](#)

Disclosable Political Donation: no

Name:

Email:

Address:

Content:

To whom it may concern,

I object this current proposal and the reasons are as follows:

This current proposal, Miranda Dental Hospital (application #MP11_0009) ,to build a seven storey private dental mega clinic which is described as a dental hospital on the corner of Kiora Rd and Urunga Parade, is an extreme departure from other dental practices in the shire, While dentists and dental specialists in the shire are not operating anywhere near full capacity. There is a concern that the proposed private facility which is profit based, will not be benefit for those patients from the community who desperately need dental treatment but socio-economically disadvantage.

This construction will dwarf the existing buildings in Urunga Parade and will have a Floor Space Ratio (FSR) of between 3.5:1 and 4.0:1 compared to the maximum recommended 2.5:1. Furthermore, from a parking perspective this is going to overtax the existing poor parking in this area and add to existing traffic congestion.

Yours sincerely

IP Address:

Submission: Online Submission from (subject)
https://majorprojects.affinitylive.com/?action=view_diary&id=25698

Submission for Job: [#4508 MP 11_0009 Miranda Dental Hospital](#)
https://majorprojects.affinitylive.com/?action=view_job&id=4508

Site: [#2445 84-86 Kiora Road, Miranda](#)
https://majorprojects.affinitylive.com/?action=view_site&id=2445



Diary from William Hizart to Simon Truong on 30/01/2012

Diary against Annex [Website Submissions](#) for job [#4508 MP 11_0009 Miranda Dental Hospital](#)

Submission Details for William Hizart

Email Details

Received 4:47PM, Mon 30th Jan, 12
Status Actioned on 30/01/2012
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 📧
Class General Details

Interactions

👤 Contacts (1)

Inbound email from:

[William Hizart - hizart dental lab.](#)
bill@hizartdental.com.au

👤 Staff (1)

Email to:

[Simon Truong](#)

Disclosable Political Donation: no

Name: William Hizart
Email: bill@hizartdental.com.au

Address:
49-51 Eton St

Sutherland, NSW
2232

Content:

I run a small business in Sutherland, which employs 11 local staff. I would see the private dental hospital as a huge bonus to my business and staff as a potential customer. We believe in hiring staff locally and supporting local dental surgeries.

The local community could benefit from specialised work such as implants and surgeries done at the new hospital/surgery, that could be done for clients that I treat in my denture clinic. We see cases that need implants, bone grafts, teeth removed or restored.

As a local resident I think the position is ideal for the owners and their future patients.

We should encourage the investment and opportunity to improve or better access health care. Miranda is the hub for health practitioners, so I welcome the project.

IP Address: [ppp4b95.dsl.pacific.net.au](#) - 125.255.11.149
Submission: Online Submission from William Hizart (support)
https://majorprojects.affinitylive.com/?action=view_diary&id=25759

Submission for Job: [#4508 MP 11_0009 Miranda Dental Hospital](#)
https://majorprojects.affinitylive.com/?action=view_job&id=4508


Site: [#2445 84-86 Kiora Road, Miranda](#)
https://majorprojects.affinitylive.com/?action=view_site&id=2445

(12)

Diary from to Simon Truong on 31/01/2012Diary against Annex [Website Submissions](#) for job [#4508 MP 11_0009 Miranda Dental Hospital](#)

Submission Details fo

Email Details

Received 11:03PM, Tue 31st Jan, 12
Status Actioned on 31/01/2012
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 
Class General Details

Interactions

Contacts (1)

Inbound email from:

Staff (1)

Email to:
[Simon Truong](#)

Disclosable Political Donation: no

Name:

Address:

Content:

A new dental teaching hospital would be a boon to the area servicing the dental care of the community and especially catering for those with special needs. It would also provide employment opportunities to the region whilst catering to all facets of dentistry including specialist care.

I favour the furthering of dental education that the hospital will support and offer, furthering the minds of health professionals and in turn being advantageous to the general public. I support this project whole-heartedly.

IP Address:

Submission: Online Submission from (support)
https://majorprojects.affinitylive.com/?action=view_diary&id=25855

Submission for Job: [#4508 MP 11_0009 Miranda Dental Hospital](#)
https://majorprojects.affinitylive.com/?action=view_job&id=4508


Site: [#2445 84-86 Kiora Road, Miranda](#)
https://majorprojects.affinitylive.com/?action=view_site&id=2445

(13)

Diary from to **Simon Truong on 24/01/2012**Diary against Annex [Website Submissions](#) for job [#4508 MP 11_0009 Miranda Dental Hospital](#)

Online Submission from (object)

Email Details

Received 7:47AM, Tue 24th Jan, '12
Status Actioned on 24/01/2012
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 
Class Anonymous Object

Interactions

Contacts (1)

Inbound email from:


Staff (1)

Email to:
[Simon Truong](#)

Please see attached submission

Attachments (1)

76.01 KB

 [MDH online.pdf](#)

Hospitals . 84-86 Kiora Road, Miranda . Jobs . MP 11_0009 Miranda Dental Hospital . Web Submissions

21st January 2012

Re: Miranda Dental Hospital – 84-86 Kiora Rd Miranda 2228
Application no MP11_0009

To whom it may concern,

I object to the current proposal for the Miranda Dental Hospital as a Sutherland Shire resident, as a business owner and as a local dentist.

As a practicing dentist I cannot see significant cause for the proposal to be considered a 'major project' (under the hospital provisions) with state wide significance considering what is being proposed by the development. I feel it is a private practice that is masquerading as a hospital. I also feel there is little to no 'public' benefit, as dentistry will not be offered under the umbrella of the health department. Currently the government has adopted a policy of funding public treatment through subsidising dental services in private practices and not construction of dental hospitals. I fail to see how this development will offer anything different to the current situation, other than on a larger scale.

This proposal is too large for the small and congested site upon which it is being planned and I feel the proposal is totally unrealistic in assuming that public transport will accommodate its' patient load. The size of the proposal is a departure from the usual council approval for dental practices within the Sutherland Shire and while I understand that the construction cost justifies the proposal coming under the 'major projects' I do not see any justification for the development submission for a 'hospital' rather than a as private dental 'mega-practice' placed in a retail environment. Common sense should prevail that the proposal in its' current state is an overdevelopment of the site.

As a resident I feel that the traffic congestion in the area during construction and operation has been grossly underestimated. With a staff of 88 and only 45 car spaces, there is a significant shortage of car parking for a 'hospital'. This situation is made worse by the fact that the subterranean staff only parking is fully automated with a rate limited car lift, which will create traffic chaos. *What if someone wants to leave and there is already a queue that is waiting for the car lift to get in?* This is also accessed by the very same area that a loading dock and the disabled car parking are to utilise. It appears to be an unworkable design for a proposal of this size and use. A hospital should be focussed on parking for their patients. As a typical dentist sees approximately 12-15 patients per day, the development application for 28 dentists would expect patient traffic in the order of 700 comings and goings, as well as 160 for staff. This *significant* increase in traffic and parking requirements will inevitably be absorbed by the surrounding streets and local shopping centre, of which there is

currently a shortage for local businesses. It will add to traffic congestion. Sutherland Shire has been recognised as having a higher than average level of vehicle ownership and residents of the shire predominantly use a car for transport. Photos submitted in the application show the Kiora Rd and Urunga Parade roads at a quiet time and thus underestimate the traffic. A more accurate photograph is shown in figure 7.07 of the Architectural report (Pt 2 of 5). Dental practices operate with high patient numbers and this needs to be considered in the context of this site.

The application quotes a shortage of services for special needs patients and the elderly. The proposal offers specialised in house facilities for those patients and differentiates itself as having operating theatres and accommodation for inpatients and their carers. *It is unreasonable for dental patients having major treatment to access and leave the site via public transport.* If treating these patients in a 'hospital' setting is a valid reason for the application there needs to be provision for significant on site parking for these special needs and surgery patients and their carers. There is not even a set down area at the kerbside as this site is cornered by two main roads with 'No Stopping' along both boundaries. The claim that there will be "reduced vehicle accidents" and "reduced vehicle congestion" (SGS Social Impact Assessment Section 5.4) due to people using public transport seems unlikely and could in fact see the opposite occur.

The proposal for patient accommodation has 2 studio style apartments. If there are 28 dentists seeing 10-12 patients per day this seems inadequate for the size of the proposal. These facilities are on the same level as the staff amenities and I cannot help be sceptical and wonder if they will be used for staff accommodation considering the hospital will likely operate as a 24 hour emergency clinic.

Of concern is the impact this practice will have on the local dental practices and businesses. The application makes reference to a lack of adequate service provision within the area. There are 19 general dentists and 8 specialists currently servicing the area. The practices in the area are not operating at capacity and the claim that there is a 30% shortage of dentists (that SGS Economics have calculated themselves on their own numbers) seems overdone. Section 5.5 of the SGS social Impact Assessment says the South Eastern Illawarra Health Service has the highest concentration of dentists of people working in dentistry (26.8%). More than doubling the numbers of dentists in Miranda will have a negative impact on surrounding practices. Section 5.6 of the Social Impact Assessment states "MDH at full capacity will operate 65 dental practitioners". This is a significant increase on the proposal number of 28 and would compound the problems significantly.

There is an indication in the proposal that the proponent will be offering services that are currently unavailable in the local area. The SGS Social Impact Assessment has constructed it's own table with data this time provided by 'the client' who does not currently operate a practice in the area. Figure 4.3 in the Social Impact Assessment - "Specialist services MDH and main competitors Sydney GMA" is misleading. Dr Russo is not a registered dental specialist and the services that he


reports as 'medium level specialist services' are offered in many practices in the local area and not just 'GDC Tahmoor and Liverpool' as shown.

For those patients who require surgery, Kareena Private Hospital and Sutherland Hospital are just 1km from the proposed site and offer accredited medical facilities with adequate medical support services and parking.

Based on the lack of adequate parking for staff and patients of a 'hospital' and the prominent, congested position at which it is being proposed, I feel the proposal is too large. The services are already being provided in the area by the local dentists. It is an overdevelopment of the site.

I do not wish for my name to be made available to the proponent or to be displayed on the Departments' website.

Yours Sincerely,



14

Simon Truong - 84-86 KIORA ROAD MIRANDA

From: "James Nangle" <nangle@planstrat.com.au>
To: <simon.truong@planning.nsw.gov.au>
Date: 2/1/2012 11:58 AM
Subject: 84-86 KIORA ROAD MIRANDA
CC: <adrian@tristateproduce.com.au>
Attachments: TRIPODINA-MIRANDA(Kiora Rd)FINAL SUBMISSION TO DEPT RE
PROPOSED DENTAL HOSP (Feb12).docx

Simon – I have lodged an online submission in regard to the dental hospital development at the above site and herewith enclose a copy for you as the assessment officer any questions contact me on 9360 1830 – James Nangle

Director General
Department of Planning and Infrastructure
23-33 Bridge Street
Sydney NSW 2000

1 February 2012

Attention: Mr Simon Truong

Dear Sir

Subject: Submission in Respect to the Major Project Application for a Proposed Dental Hospital at Nos 84-86 Kiora Road Miranda – Application No MP 11 0009

INTRODUCTION

I act for the owners of Nos 88-90 Kiora Road Miranda, Tripodina Nominees, and make a submission on their behalf concerning the above application which has been applied for under Part 3A of the Environmental Planning and Assessment Act

My clients are immediately adjoining to the south of the proposal and are concerned about the bulk, scale and appearance of the development and likely amenity impacts on their property

EXECUTIVE SUMMARY

The proposal fails to satisfy the following ***Objects of the Act*** in that –

- It does not encourage the proper management, development and conservation of cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment
- The promotion and co-ordination of the orderly and economic use and development of land due in large measure to the existing constraints of the site and therefore overdevelopment of the land

The proposal complies with the land use requirements in the SSLEP

The proposed development is considerably in excess of the ***SSLEP Development Standard*** by 1.45:1 or 58% which is significant and material

The proposed justification for the excess in floor space, over and above the SSLEP control is –

- scant on planning justification,

- does not consider the objectives of the standard or the zone,
- appears to rely heavily on an architectural critique of the proposed form and massing and
- the proposed bulk and scale appears to rely on the existing four level Westfield shopping centre development to the north and west of the site

There appears little information in relation to whether the development standard is unreasonable or unnecessary in the particulars of this proposal

The justification for the reasonableness of the height also considers the existing Westfield development but does not touch on the existing two storey forms immediately to the south and east

The site is considered too small, having an area of 490.5 sq. metres and frontage to Kiora Road of 13.4 metres to provide a bulk and scale as proposed with the external environmental and amenity impacts that will occur

The **roof top open space** contains minimal landscaping, will be of no benefit to the public domain and because of its location, will only be used, if that, by staff as their facilities are also located at the roof top; there will, in my view, be minimal use by patients, the main use and purpose of the facility

There has been insufficient and unacceptable consideration of the blank/ solid **southern elevation** and to propose the top two levels as a glazed wall, does not consider and resolve the issue of sufficient articulation and modulation of this façade

The proposed loss of **solar access** to the properties at Nos 88-90 and 92-94 Kiora Road at the equinox and winter solstice periods is unreasonable

The proposed reduction of solar access to a dwelling within Nos 88-90 Kiora Road is an inappropriate and unacceptable impost on the amenity

The potential loss of **visual privacy** from staff and patients looking down from the top two levels is also unacceptable and not appropriate as I interpret the DGRs guidelines

Adverse **Social Impact** occasioned by the total abrogation of the need to provide for patient parking for a facility put forward as available for all of the greater metropolitan area

The lack of any patient (visitor) **parking** for a facility which wishes to be considered as a regional development is completely unacceptable and fails to consider the needs of patients; not everyone is located close to or within walking distance of public transport, as is the proposed dental hospital at Miranda

The undersupply of car parking by 16 spaces is unacceptable and leads one to a conclusion that what is proposed is an overdevelopment of the site

The fact that all car parking is proposed via a mechanical stacking facility with insufficient waiting bays is also of concern due to the very close proximity of Urunga Parade and Kiora Road and I also believe that patients would not be able to use the mechanical stacking in any event, as the system will only work with people who use the facility all the time such as staff

I believe that, owing to the existing site constraints, the bulk, scale and density of the proposed development is inappropriate and creates the adverse environmental and amenity impacts of

insufficient car parking, adverse solar access and visual privacy impacts, which when combined lead to a conclusion that what is proposed is an **overdevelopment** of the land and should not be permitted

LAND

The site is located on the south east corner of Kiora Road and Urunga Parade and has a real property description of Lot C DP 415413. The site contains an area of 490.5 sq. metres with a frontage to Kiora Road of 13.41 metres and Urunga Parade of 36.575 metres. The site also has rear lane access to Urunga Lane of 13.41 metres

The site rises toward the north east by approximately 2.5 metres

Contained on the land is a two storey building with retail shop at ground level and dental surgery above built to the Kiora Road and Urunga Parade boundaries; the built form takes up approximately half the site area and the remainder of the land is occupied as on ground car parking with driveway access to Urunga Parade

LOCALITY

Adjoining the site, are the following uses and scale of development:-

North (across Urunga Parade): four storey retail shopping centre

East (across Urunga Lane): two storey commercial building

South: two storey retail and residential building

West (across Kiora Road) four storey retail shopping centre

Located within walking distance of the site are:

Miranda Railway Station (30 metres)

Bus stops in Kiora Road (44 Metres)

PROPOSAL

The development proposed for the site provides for a large dental hospital which provides for seven storeys and includes the following accommodation:-

Basement

Three levels of stacked car parking with 43 spaces for employees only accessed via a car lift giving direct access to Urunga Lane

Lower ground floor plan

Entry; reception; waiting area; admin office; consult; recovery; disability toilet; plant; store; lobby; theatre; lift; store; disability toilet; stair; three surgeries

Upper ground floor plan

Stairs; entry; lobby; lift; toilet; retail; disability car space/ loading bay; driveway; car lift; waiting bay; waste bin store; toilet; stairs; plantroom; switch room

Level 1 floor plan

Stairs; Department of Radiology; plant and equipment; lift; plant and equipment; Department of Periodontal Treatment; toilets

Level 2 floor plan

Stairs; Department of Orthodontics; plant and equipment; lift; plant and equipment; Department of Cosmetic Surgery; toilets

Level 3 floor plan

Stairs; Department of Implants and Restorative; plant and equipment; lift; plant and equipment; Prosthetics and Restorative Clinic; toilets

Level 4 floor plan

Stairs; Department of Special Needs; plant and equipment; lift; plant and equipment; Post Operative Teaching and Lecturing; toilets

Level 5 floor plan

Stairs; female change; staff lunch room; male change; lift Inpatient Overnight Accommodation

ZONING

The land is zoned 8 – Urban Centre within the Sutherland Shire Local Environmental Plan 2006 (SSLEP), which permits, amongst other uses:

Business premises; educational establishments; medical facilities; shops

The existing and proposed uses are permitted with consent

The zone has objectives identified and it is considered that the proposed development does not necessarily meet some of the objectives as follows -

- to identify appropriate land for the provision of a wide range of retail, business and professional activities
- to provide for an integrated mix of commercial, office, retail and residential buildings

HERITAGE

The site does not contain a heritage item however the site is within the vicinity of an item being the Miranda railway station

DEVELOPMENT STANDARDS

Maximum floor space ratio Permitted: 2.50:1

Proposed: 3.95:1

Maximum height of building Permitted: 7 storeys (28 metres)

Proposed: 7 storeys (23 Metres)

The significant breach of the floor space ratio standard is unreasonable with insufficient justification being provided as to why it is reasonable and necessary in the circumstances of this particular case to create a non-compliance with the standard

DCP

The Sutherland Shire Development Control Plan 2006 (DCP) applies to the site and proposed development with the following specific requirements

- Consideration of railway noise - considered
- Medical services suggested in the strategy – proposed
- Awnings over the footpath, active street frontage and nil street setbacks at ground level – provided
- Two metre street setback from two storeys and above – proposed development appears not to comply from both Kiora Road and Urunga Parade
- Ensure new development does not create unreasonable visual and acoustic privacy issues for adjoining residential development – there are privacy issues to an existing dwelling at No 88-90 Kiora Road
- Avoid overshadowing of any neighbouring residential property – there is a dwelling at No 88-90 Kiora Road which will be overshadowed
- Car parking at the rate of 1 space/ doctor; 1 space/ 3 employees and 1 space/ 3 beds for visitors – proposed development does not comply in terms of visitor beds and staff numbers
- Design of car parking areas – there appears to be issues in terms of the type of car parking proposed and relationship with access and the street system
- Proposal requires a Social Impact Assessment – provided

The non-compliances with a number of controls highlights the unacceptability of the proposal

DGRs

Director-General's Requirements (DGRs) for the proposed development

Issued: 25 February 2011

Expiry date: 25 February 2013

The Environmental Assessment has been exhibited within the required timeframe

Key issues:

Objects of the EP&A Act

State Environmental Planning Policy (Major Development) 2005

State Environmental Planning Policy No 55 – Remediation of Land

This has been provided

State Environmental Planning Policy No 33 – Hazardous and Offensive Development

This has been provided

State Environmental Planning Policy (Infrastructure) 2007

This has been provided

NSW State Plan - provided

Sydney Metropolitan Plan for Sydney 2036 – provided

Draft South Subregional Strategy – provided

Sutherland Shire Local Environmental Plan 2006 – There are some issues with one primary control as it affects the proposed development

Relevant Development Control Plans – various issues outlined

Nature and extent of any non-compliance with relevant environmental planning instruments, plans and guidelines and justification for any non-compliance – insufficient and inappropriate justification
Justification for the height, bulk and scale of the proposed development within the context of the locality and adjoining development, particularly given the proposed exceedance of Council's LEP density controls – unacceptable and inappropriate justification as to the non-compliance with the standard

Details of proposed open space and landscaped areas – unreasonable

Design quality with specific consideration of the façade, massing, setbacks, building articulation, appropriate colours/ materials/ finishes, landscaping, safety by design and public domain.

Specifically, greater consideration of design quality of the southern elevation which requires further modulation and articulation so that it does not present as a blank and solid wall – not provided

Impacts of the proposal on solar access, acoustic privacy, visual privacy, view loss and wind impacts on surrounding development – unreasonable and unacceptable impacts; no wind impact analysis

Details of the measures to be implemented to achieve a high level of environmental amenity for future occupants of the dental hospital and surrounding properties – not considered

Provide a Transport and Accessibility Study considering the following

- Estimate of the total trips generated by the proposed development and identify measures to manage travel demand, increase the use of public and non-car transport nodes
- Provide an analysis of public transport provision, walking and cycling connections within the vicinity of the site and address the adequacy of the proposal to meet the likely future demand and the potential for improving accessibility to and from the site
- Identify potential traffic impacts during the construction stage of the project and measures to mitigate any potential impacts
- Describe the measures to be implemented to promote sustainable means of transport including public transport usage and pedestrian and bicycle linkages
- Daily and peak traffic movements likely to be generated by the proposed development, including the impact on nearby intersections
- Details of the proposed access, parking provisions and service vehicle movements
- Minimal levels of on site car parking for the proposed development having regard to the high public transport accessibility of the site, opportunities for car sharing

Report provided but does not give sufficient justification as to the lack of car parking for visitors (patients) in a facility which is proposed to be available to the whole of the greater metropolitan area of Sydney

Detail how the development will incorporate ISD principles in the design, construction and ongoing operation phases of the development - provided

Include a description of the measures that would be implemented to minimise consumption of resources, water and energy - considered

Demonstrate that the development can achieve a minimum 4 Green Star rating - considered

Any other matters including:

- Section 94 contributions
- Heritage
- Aboriginal heritage
- Drainage
- Utilities
- Staging

- Noise and Vibration
- Waste
- Hazards
- Consultation

Provided

ENVIRONMENTAL ASSESSMENT

The Environmental Assessment (EA) prepared by Economia PDS Pty Ltd dated November 2011 in a response to the DGRs appears to be deficient in that –

1. The SEPP (Major Development) has been kept in force by reason of Schedule 6A of the Act in terms of projects to be assessed under the terms of Part 3A – it has not been repealed in terms of this application
2. There does not appear to be a very robust or even reasonable planning justification as to the non-compliance with the density control in the SSLEP
3. The roof top open space is at a considerable distance from the majority of uses within the building, between one to four levels below and would mainly be used for staff primarily
4. Insufficient consideration of the blank/ solid wall to the south
5. Unreasonable reduction of solar to properties to the south for the majority of the year
6. Unreasonable loss of amenity in terms of loss of solar access to a dwelling in Nos 88-90 Kiora Road
7. Potential overlooking from the top two levels of the proposal toward the south and the properties at Nos 88-90 and 92-94 Kiora Road
8. There has been no consideration of the measures necessary to achieve a high level of environmental amenity for future occupants of the hospital and surrounding properties
9. The Transport and Accessibility Study appears to rely on the proximity to public transport and the DGRs issue regarding minimising on site car parking as the reason to accept the reduced car parking requirement under the DCP required
10. The Transport Study does not appear to address the issue raised in the Social Impact Report about the negative social impact of reduced car parking for patients nor the fact that there will be no patient car parking provided

The EA is deficient in the areas as outlined above

ISSUES

Objects of the Act

The proposed development of a seven level dental hospital does not

- encourage the proper management, development and conservation of natural and artificial resources, in particular cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment, or
- the promotion and co-ordination of the orderly and economic use and development of land, due to the –
 - Constrained site area and Kiora Road site frontage
 - Unreasonable bulk and scale of development when viewed against existing development to the south and east
 - Unacceptable car parking numbers and method of parking

The proposed development is trying to 'squeeze' too much on the land and a more reasonable and appropriate development would include the existing underdeveloped properties adjoining at Nos 88-90 and 92-94 Kiara Road, which would help to resolve the identified adverse issues in this proposal

Floor Space

The proposal breaches the floor space ratio development standard contained within the SSLEP by a large 1.45:1 or 58% which is significant and material

I also consider that the proposed development fails to satisfy the following objectives of the standard which include –

- To ensure that development is in keeping with the characteristics of the site and the local area

The constraints occasioned by the minimal width of the site and its area preclude a bulk and scale of a seven level built form and in particular when placed adjoining a two storey built form with small footprint

- To provide a degree of consistency in the bulk and scale of new buildings that relates to the context and environmental qualities of the locality

The existing consistency of bulk and scale of built forms on the south side of Urunga Parade does not allow for a seven level development which by its nature creates adverse environmental qualities on the locality

- To minimise the impact of buildings on the amenity of adjoining residential properties

The proposed built form will create material adverse amenity impacts onto an adjoining dwelling which is unreasonable and inappropriate

I consider that insufficient justification has been enumerated that the departure with the standard is reasonable and/ or necessary in the circumstances of this case

In detail the EA relies on Part 3 and Part 7 of the document and also refers to the Architectural Design Report. Part 3 Site Analysis and Context provides minimal justification as to why the bulk and scale of the proposal satisfies the objectives of the control and is reasonable and necessary in this instance..Part 7 Environmental Assessment refers specifically to the Architectural Design Report but also states '....The proposed development can meet the required FSR by unnecessarily increasing the floor to ceiling heights and use of voids without resulting in any overall reduction in the scale and bulk of the building and without any perceived change to the overall environmental impact of the building.' This is a nonsense; if the number of floors is reduced by increasing the floor to ceiling height, then you won't obtain the uses as proposed on each floor because there won't be as many floors and therefore the density will be reduced to better reflect that proposed in the control. The EA concludes that strict compliance with the FSR in SSLEP is seen to be both unreasonable and unnecessary due to –

- The proposed building does not exceed the height development control standard

- The proposed building is not higher than the predominant building height in the immediate locality, and
- The proposed building does not impact on the amenity of adjoining properties in terms of overshadowing and overlooking

I agree that the proposal does not exceed the height requirement, however the object or purpose of this standard is different to the density standard and the object or purpose has not been met

I do not agree that the proposal does not exceed the predominant building height in the immediate locality, which is between two storeys as can be seen to the south and east of the site

Finally and importantly, the proposal does adversely impact on the amenity of properties to the south, as can be seen from the shadow diagrams and also the glass wall at levels 5 & 6 as shown in the Architectural drawings

The ADR considers the volume and massing in considerable detail, particularly in terms of the height and setbacks of the proposal, but nowhere does it specifically address the issue of FSR

Scale

The scale of the proposal, being seven storeys, is considerably in excess of the existing scale of development immediately adjoining to the south at properties Nos 88-90 & 92-94 Kiora Road which are both two storeys and other development to the east, of Urunga Lane, which are two to three storeys and appears out of character

As well, and importantly, the proposal creates considerable overshadowing of the adjoining properties to the south, where there is one dwelling and there will be a potential overlooking situation from the proposed southern glass wall looking down over these same properties

The justification for the scale, being the existing Westfield shopping centre which is across the road from the site (a distance of 23 metres across Urunga Parade and 44 metres across Kiora Road) and the approval for a third storey on the property to the east across the laneway, does not consider the existing two storey forms immediately abutting the site to the south at 88-90 and 92-94 Kiora Road

The site, having a frontage to Kiora Road of 13.41 metres is too narrow to accommodate a seven storey built form, immediately adjacent to two storeys and including appropriate level of car parking

A more appropriate conclusion to the height and scale issue is to adopt a strategic approach and redevelop all of the properties in Kiora Road between Urunga Parade and the station

Landscaping/ Open Space

The DGRs have included details to be provided of the proposed open space and landscaped areas

The applicants response is to provide terraces at the top, seventh level, with nil landscaping

There is no open space or landscaping at or near to the ground floor public domain

There does not appear to be any landscape plan for this roof top terrace area

South Wall

The proposal provides for a two level glass wall for the length of the top two levels of the hospitals southern facade; this will obviously need to be appropriately treated to minimise any fire risk

However, this solution could create potential visual privacy loss to the rear of properties immediately adjacent to the site at Nos 88-90 Kiora Road, where there is at least one dwelling and Nos 92-94 Kiora Road

The DGRs included '....Specifically, greater consideration of design quality of the southern elevation which requires further modulation and articulation so that it does not present as a blank and solid wall.'

The proposed southern elevation fails to address the above requirements in terms of modulation, articulation and appropriate colours/ materials/ finishes

Amenity

The proposal creates unacceptable amenity impacts to the immediate properties and development to the south in terms of –

- Loss of solar access to the rear of No 88-90 Kiora Road, including one dwelling
- Loss of visual privacy to the rear of No 88-90 Kiora Road, including one dwelling
- Loss of solar access to the rear of No 92-94 Kiora Road
- Loss of visual privacy to the rear of Nos 92-94 Kiora Road

Social Impact

The lack of any on site car parking for patients in a proposed regional medical facility does have an adverse social impact and this has been identified in the Social Impact Assessment

Notwithstanding the proposal's close proximity to both rail and bus public transport, this facility will be drawing on a large catchment, within the southern region of Sydney and the Social Impact Assessment also considers the whole of greater metropolitan Sydney to be part of the catchment. There are therefore significant areas where public transport is not easily accessible and the only choice is the vehicle and in this instance, parking within the surrounding streets or car parks

I do not consider this reasonable, nor do I consider that this was envisaged within the DGRs guidelines '....minimal levels of on site car parking for the proposed development having regard to the high public transport accessibility of the site, opportunities for car sharing, local planning controls and RTA guidelines.'

Traffic and Parking

The justification for the car parking proposed is that it complies with the requirements of the Council's DCP (subject to the parking rates provided for Zone 8 being provided as a maximum) and the DGRs providing for minimal on-site car parking

The report specifically states '....The construction of the car stacker was identified as the only viable option for providing a satisfactory level of car parking on-site due to the site constraints, namely the narrow width of the site. Accordingly due to the complexity of the car stacker system and the potential delays associated with access by visitors no familiar with the operational procedures, it is proposed that no visitor parking be provided. This is however considered supportable for the following reasons:

- Close proximity of the Miranda interchange which provides exceptional access to a significant public transport network
- Many visitors will be within the commercial centre for other reasons and will walk to the site
- The reduced parking provision is sound planning policy that meets the objectives of State Government

I accept the premise above in terms of sound planning policy but would suggest that employees should more reasonably be asked to travel by public transport to reduce the peak hour travel demand on the road system and parking be available for patients provided on site

These visitors (or patients) will be coming from far afield, on the basis of the information provided with the application and may not have good access to public transport at their point of departure; as well there is very limited on-street car parking close to the site and only for 15 minutes maximum duration in Kiora Road

There is therefore a strong argument that a number of parking spaces should be allocated to patients but as the report states, this is not supported due to the complexity of the car stacker system and potential delays due to unfamiliar use of the stacker operation. The car stacker is the only viable system based on the site width

Therefore, it may not be appropriate to use such a system and if the width of the site cannot accommodate a typical basement car park, then possibly the site is not appropriate for the use

Overdevelopment

The proposal, due to –

- Proposed floor space
- Proposed scale of development
- Existing site constraints
- Inadequate open space and landscaping
- Blank southern elevation
- Loss of amenity
- Unacceptable social impact
- Unacceptable traffic and parking impacts

is considered to be an overdevelopment of the site and creates an inappropriate and unreasonable bulk, scale, mass, form and design in this locality

Development in the form proposed should only be realised, in an appropriate strategic sense by including all of the allotments between Urunga Parade and the railway, including Nos 84-94 Kiora Road, which would resolve the obvious issues uncovered in this unacceptable development

CONCLUSION

The proposed development of a seven storey dental hospital is an appropriate use in the locality however the specific design creates unacceptable and inappropriate impacts, both within the site and onto adjoining properties

The constraints of the site, particularly the site width, will not allow for the bulk and scale of development proposed

Strategically, the site should be amalgamated with the two adjoining at Nos 88-90 and 92-94 Kiara Road to create a much more appropriate form in this location, which will minimise any adverse impacts

Yours faithfully

James Nangle
Planning Strategies Pty Ltd
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(E) nangle@planstrat.com.au

(15)

Diary from to Simon Truong on 01/02/2012Diary against Annex [Website Submissions](#) for job [#4508 MP 11_0009 Miranda Dental Hospital](#)

Submission Details for

Email Details

Received 9:24PM, Wed 1st Feb, 12
Status Actioned on 01/02/2012
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 📧
Class General Details

Interactions

👤 Contacts (1)

Inbound email from:

👤 Staff (1)

Email to:
[Simon Truong](#)

Disclosable Political Donation: no

Name:
Email

Address:

NSW

Content:
Objection to Miranda Dental Hospital

IP Address:
Submission. ~~Online Submission from~~ s (object)
https://majorprojects.affinitylive.com/?action=view_diary&id=25874

Submission for Job: #4508 MP 11_0009 Miranda Dental Hospital
https://majorprojects.affinitylive.com/?action=view_job&id=4508

Site: #2445 84-86 Kiora Road, Miranda
https://majorprojects.affinitylive.com/?action=view_site&id=2445

Attachments (1)

65.52 KB

 [MDH OBJECTION 2.pdf](#)

Hospitals . 84-86 Kiora Road, Miranda . Jobs . MP 11_0009 Miranda Dental Hospital . Web Submissions

30 January 2012

Re: **Miranda Dental Hospital 84-86 Kiora Rd Miranda NSW 2228**
Application No MP11 0009

To whom it may concern

I am writing to object to the development of this site as a Dental Hospital

I am a dental practitioner, who has worked in Miranda for the last 23 years .

I would also like to object to the timing of public exhibition and closure date for submissions. One cannot help but think that the timing of public display was deliberately timed to coincide with the Christmas New Year holiday period when many businesses close down., thus not allowing sufficient time to properly assess the impact of such a major development.

My objections are as follows:

1. Scale and bulk of project.

This project will dwarf existing buildings in Kiora Rd, Urunga Pde and surrounding streets.

The proponent has gone to great lengths to show "potential building form" for surrounding buildings in order to disguise the bulk and scale of the development

Floor space ratio is 3.95:1 compared to maximum allowed by Sutherland Shire Council of 2.5:1. This is a massive overdevelopment of the site

2. Inaccuracies in the proponents application regarding dental workforce in Miranda and the Sutherland Shire

The proponents own figures state that 26.8% of NSW dentists work in the South East Sydney Area Health Service. This is the highest concentration of dentists in all of Sydney's Area Health Services. So why the need to introduce this facility?

According to the Australian Dental Association Directory 27 dentists work in Miranda , of which 19 are general practitioners and 8 are specialists. According to the proponents own figures Miranda has a population of approximately 17,000 people.

This equates to 1 general dental practitioner per 894 people.

From my extensive experience, for a one operator dental practice to operate profitably it needs a minimum data base of 4000 patients.

Miranda already has an excessive number of dentists who struggle to fill their appointment books.

The proponents statement that there is a shortage of dental services is simply incorrect, and the introduction of 28 new dentists in Miranda will have a major detrimental effect on every Sutherland Shire dentist and their staff.

Additionally there are a number of gross inaccuracies in section 4.3 "Analysis of existing Facilities" in the proponents Social impact assessment . Miranda has a number of high level specialists, including Anaesthetists, Orthodontists Paediatric dentists, Oral Surgeons, Periodontists, all of whom provide a comprehensive range of high level treatment, in their rooms or utilizing the modern facilities of local private hospitals. A number of high level specialist dentists also operate in Sutherland and Hurstville. The proponent has not even acknowledged the existence of a number of these specialists and to state that Gentle Dental Care will fill this void is simply not true.

I suspect that in order to justify the notion that this is a Dental Hospital, which will "provide great public benefit", the proponent has stated that MDH will provide a number of pro bono and reduced cost services via participation in a number of Government Schemes. I can inform you that every single dentist in the Sutherland Shire provides these services to their patients via participation in these schemes which are, the Medicare Chronic Disease or EPC Scheme, Veterans Affairs , Medicare Teen Dental program. It is incorrect to portray the MDH an innovative provider of these services.

Proponent states the following re services MDH will provide:

- Day surgery, day procedures or health consulting rooms
- Accommodation for persons receiving cosmetic dental care, facial reconstruction and so on
- Accommodation for special needs patients and their carers
- Shops or refreshment rooms
- Educational purposes
- Research purposes
- Any other dental related use

Rest assured that the above points are mentioned to satisfy the notion that this is a Dental Hospital which will be of great public benefit when the reality is that this will be a profit driven private dental clinic and the majority of work performed will be "any other dental use" which consists of general dentistry on an extended hour 7 day per week basis which will adversely affect the livelihood of all Sutherland Shire dentists and their support staff

I also believe that the MDH will be used minimally for educational and research purposes. This, I believe is an attempt to "tick all the boxes" in

order to make the application more appealing. The question needs to be asked what academic qualifications/professional endorsements from reputable tertiary institutions/professional bodies will the MDH have to provide these services?

3. Parking

I do not have the means to employ consultants who use questionable data to portray parking as not being a problem in and around this site.

However I would assert that if any Sutherland Shire resident was picked at random from the White Pages and asked regarding parking in and around Urunga Pde, the answer would be that the area is already congested and a nightmare to park in during business hours. The MDH will employ 88 full time staff, yet provide parking for only 43 vehicles plus one disabled parking/loading dock. Were will the additional 44 vehicles park?

Additionally the MDH will have 33 dental chairs which when operating at full capacity will be seeing between 10-15 patients each day. This means that between 330 and 495 patients will also be requiring parking spots throughout the day in an already congested location.

The proponent states in his application that the use of public transport will be promoted to ease traffic congestion in the area. In my experience patients in this area use their own motor vehicles to attend their appointments, they will not be using public transport. This is further supported by the proponent's data which states "the majority of people travelling to work in Sutherland LGA do so as the driver of a private motor vehicle" and "the next most common mode of travel is as a car passenger"

In conclusion I question the need for such a facility in this area. Miranda and the Sutherland Shire generally, are, as per the proponent's figures, relatively affluent areas with the highest concentration of dentists in NSW and a great number of high level dental specialists.

I also object to the fact that this is a private dental clinic that has been falsely represented as a hospital that will provide great public amenity. Additionally I object to the scale of the development and the adverse effect it will have on parking in the area

Your Sincerely


16

Diary from Jeffrey Agius to Simon Truong on 02/02/2012

Diary against Annex [Website Submissions](#) for job [#4508 MP 11_0009 Miranda Dental Hospital](#)

Submission Details for Jeffrey Agius

Email Details

Received 10:01AM, Thu 2nd Feb, 12
Status Actioned on 02/02/2012
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 
Class General Details

Interactions

Contacts (1)

Inbound email from:
[Jeffrey Agius](#) - [Refresh Dental Care](#)
jjadentist@yahoo.com

Staff (1)

Email to:
[Simon Truong](#)

Disclosable Political Donation: no

Name: Jeffrey Agius
Email: jjadentist@yahoo.com

Address:
187 President Ave

Miranda, NSW
2228

Content:
see attached PDF

IP Address: 122-148-208-44.static.dsl.dodo.com.au - 122.148.208.44
Submission: Online Submission from Jeffrey Agius (object)
https://majorprojects.affinitylive.com/?action=view_diary&id=25876

Submission for Job: [#4508 MP 11_0009 Miranda Dental Hospital](#)
https://majorprojects.affinitylive.com/?action=view_job&id=4508

Site: [#2445 84-86 Kiora Road, Miranda](#)
https://majorprojects.affinitylive.com/?action=view_site&id=2445

Attachments (1)

133.7 KB

 [MDH_20submission.objection\[1\].pdf](#)

Hospitals . 84-86 Kiora Road, Miranda . Jobs . MP 11_0009 Miranda Dental Hospital . Web Submissions

Dr Jeffrey Agius
Refresh Dental Care
187 President Ave
Miranda NSW 2228

1 February 2012

Re: Miranda Dental Hospital – 84-86 Kiora Road Miranda
Application No MP11_0009

To whom it may concern,

I am writing to express my opposition to the construction of a dental hospital, which is a questionable definition, more likely a large private profit driven dental clinic, at the corner of Urunga Parade and Kiora Rd, Miranda.

I would like it noted that the exhibition of this project and the closure date for submissions has been timed to coincide with the Christmas holiday period. Dissemination of relevant information to people who will be affected by this project has been reduced, and their subsequent ability to lodge an appropriate submission has been limited because many businesses close down or have reduced staff over this period.

I wish to object based on the following observations or misleading comments as not only a resident and business owner in the Sutherland Shire, but also as a general Dental Practitioner operating within my own Private dental clinic in Miranda. Having recently completed redevelopment of a site at 187 President Ave Miranda for my dental clinic I have had very recent first hand dealings with Sutherland Shire council in regards to strict conditions relating to issues such as FSR and parking space allocation, and whilst I understand the different zoning of the site in question would allow for different conditions, however I would like to make the following comments:

1. The applicants definition of a Dental Hospital as described in schedule 1 of the SEPP (major projects) is extremely questionable as it appears that there is no facility for in-patients, no beds apart from the 2 double and 2 single beds on the 5th floor which is reserved for staff change rooms and cafeteria. These beds will most likely be used for staff who are on night duty rather than in-patients. It appears this definition is used in order to satisfy part 3A of the EPA act 1979 in order to by-pass Sutherland Shire Council who is against such scope of development for this site.
2. The applicant proposes the development of the site would be geared to the underserved special needs patient e.g. a young child with autism and their carers, with accommodation for the special need patient and their carer.
This is extremely questionable as the facility ;
 - Provides only one disabled parking space which is shared with a loading bay/zone

- Fails to provide any dedicated drop off zones as it is highly unlikely a special needs patient would take public transport or walk to the facility
 - Fails to provide adequate or truly dedicated over night accommodation for the special needs patient and their carer, apart from the one suite with 2 single beds, as it is unlikely a child with autism would share a double bed with their carer, which is situated on the 5th floor with staff facilities and not on the 4th floor where the special Needs department is located
 - Has only 2 dental chairs and no consulting room dedicated to the special needs patient (the apparent focus of the whole development), yet has approximately 30 other dental chairs, 4 consulting rooms and 2 operating theatres devoted to the unquestionably more profitable departments of orthodontics, endodontics, cosmetic dentistry, implants, periodontics, prosthetics and restorative dentistry. This would support the theory that this is indeed a very large dental clinic, which should be subject to the more rigid guidelines imposed by Sutherland Shire council. This is in fact actually stated on page 14 of the Social Impact Assessment (SIA) included with the application which states " The proportion of high income earners, with an income greater than \$1000 per week is high in all three catchments. This is an important consideration, given the cost of dental and oral health services in Australia. The larger base of high income earners is likely to have the means to potentially patronise a number of services that will be offered at MDH."
 - Another misleading statement states that many dentists are not equipped to handle the special needs patient, yet GDC and MDH will have "soft and hard tissue lasers and air abrasion". These are not special equipment needed to treat a patient with special needs and the majority of private practitioners would have these items, so they are not unique to GDC or MDH. The fact that I have one entire dedicated disabled car park on my facility, as do several other private dental surgeries in the area, which is not shared with a loading zone would actually place me in a better position to handle such a patient on a daily basis, which I do.
 - The special needs patient does not necessarily require dental treatment within a hospital surrounding; as is stated by the applicant, who also runs 2 private dental clinics, they already cater to the special needs patient within these existing facilities, so it is clear that such patients can and are already catered for by the general dental practitioners and existing specialists with IV sedation if required which can be performed in a clinic rather than hospital
3. Other rationales provided by the applicant to support the proposed development for a "hospital" which are questionable and are misleading include;
- GDC and MDH will cater to Medicare EPC patients, Veteran Affairs patients and patients under the Teen Dental plan. One would be certain to find that under the current financial climate the majority, if not all, of private dental practitioners in the Miranda area and all of the Sutherland Shire are already seeing these patients, so there is no shortage of care for these patients.
 - MDH would provide special facilities for the treatment of patients with spinal cord injuries however fails to elaborate as to what these facilities are and seeing as there are no dedicated beds this is questionable
 - MDH will provide overnight accommodation for persons receiving cosmetic dental treatment. I personally provide cosmetic dental treatment to my patients all day every day and none of these patients ever require overnight accommodation

- MDH will provide overnight accommodation for persons receiving surgery such as facial reconstructions. These patients, who are usually victims of motor vehicle accidents, would often have other life threatening injuries and would be taken to a major medical hospital where an on-call Oral and Maxillofacial surgeon would attend to them in the same hospital once their other more serious injuries were attended to. There are currently already 3-4 oral and maxillofacial surgeons in the St George and Sutherland shire. The lack of an ambulance bay at MDH also makes such a facility inappropriate.
 - MDH will provide a range of dental services to an area which is lacking such services, yet the applicant fails to point out that there are in the suburb of Miranda alone approximately 19 general dental practitioners, 4 orthodontists, 2 oral and maxillofacial surgeons, 1 periodontist, 1 paedodontist and I know for a fact soon to be (in the next 6 months) 2 part-time prosthodontists. Keeping in mind that a vast number of the general practitioners are providing services such as orthodontics, implant surgery, oral surgery and endodontics there is certainly no shortage of such services in this area and hence no benefit to the community in allowing MDH to proceed
4. The biggest issue of such a development is the lack of parking. I believe the applicant, as stated above, is defining such a development as a hospital rather than a clinic (which it truly is) in order to bypass the stricter codes imposed by Sutherland Shire council. My modest 2 chair clinic (with scope for 3 chairs) required a minimum of 6 parking spaces and 1 disabled car space (approximately 2 car spaces per chair) on my approximate 820m2 block. This restricted my building envelope and FSR. If such a proposed development which is on a tiny block of 490.5m2 were to proceed, and with scope to service 32-34 patients concurrently (approximately 32 chairs and 2 operating theatres) then there should be an absolute minimum of 68 patient car spaces available. Yet the proposal provides ZERO car parking for patients. Where are the supposed overnight patients going to park? As well, the proposal only provides parking for 43 staff and 1 disabled parking. However 88 staff are to be employed (or is it 100 as stated in another part of the proposal), so yet again not only will 68 or more patients per half hour or so need to park on already congested streets but so too will 44 or more staff. The mechanical parking system is just unacceptable. What provisions are there for failure or scheduled maintenance of such a system if this facility is to operate 24hrs a day, 7 days per week. This development will no doubt cause extreme congestion and traffic chaos on already busy roads with Westfield car park entry and exit being in such close proximity. To assume a vast majority of patients visiting a clinic such as this will use public transport is absurd; the applicant himself has stated on p15 of the SIA that "Cumulatively the figures indicate that people in the catchment have very high mobility, and this would impact their ability to access services such as the proposed dental hospital. However, given that parking at the site will be minimal, the high rate of ownership and assumed use of private motor vehicles may have an impact." And, once again, the applicant's statement on p15 of Architectural Design Report part 2 that "**REDUCED CAR PARKING PROVISION** (is)- To encourage the use of car pooling, walking, bike riding and public transport" - is, to say the least, very optimistic with no data to back up such a statement and is actually a very creative cover up of a huge design flaw.

5. The final concern and objection I have is the over-development of the site. The small size of the block with an area of 490.5m² and a proposed FSR of 3.5:1 and 4.0:1 exceeds the maximal permissible of 2.5:1 and this should be an immediate reason for refusal of the application. Such guidelines are there to serve the purpose of preventing over zealous and greedy development, as well as preventing the construction of monstrous buildings enveloping adjacent development and should such development proceed then it would set a precedent for future development of the surrounding lots. The rules must apply to EVERYONE; I had to comply with the maximal permissible FSR in my zone for my private dental clinic and calling this a Dental Hospital is merely a smokescreen and diversion from the truth that this is another private dental clinic but on a much larger scale and one investing over \$17 million dollars is not out to benefit the community but to ensure an immediate and adequate return on investment and this would not be achievable without exceeding the maximum permissible FSR.

In conclusion my opposition to the proposed development is based on the fact that this is not a hospital but a private dental clinic based on the points raised above which will:

1. Offer very little **public** amenity.
2. Allow the site to be grossly overdeveloped with a FSR of 3.5:1 to 4.0:1.
3. Cause far greater traffic congestion than is already present due to a major increase in traffic flow and increase the likelihood of accidents involving vehicles with other vehicles or pedestrians.
4. Make parking, which is already extremely difficult, become almost impossible during the day for the clients of all the surrounding businesses in Miranda.

This development must not proceed in its current form and thus there can be no other option but to refuse the application.

Yours Sincerely

Jeffrey J Agius BDS

(17)

Diary from to Simon Truong on 02/02/2012Diary against Annex [Website Submissions](#) for job [#4508 MP 11_0009 Miranda Dental Hospital](#)**Submission Details for****Email Details**

Received 11:11AM, Thu 2nd Feb, 12
Status Actioned on 02/02/2012
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 🐼
Class General Details

Interactions**👤 Contacts (1)**

Inbound email from:

:

👤 Staff (1)

Email to:

[Simon Truong](#)

Disclosable Political Donation: no

Name:

Email:

Address:

Content:

I wish to add my support for this proposal as it will greatly improve the dental services in our area. The position of the development is ideal - being located away from residential housing, near other medical services and with a westfield shopping centre opposite. The site is located immediately adjacent to both rail and bus transport and has a taxi rank immediately opposite. in my view it is a perfect site for such a facility.

IP Address: -

Submission: Online Submission from (support)

https://majorprojects.affinitylive.com/?action=view_diary&id=25883Submission for Job: [#4508 MP 11_0009 Miranda Dental Hospital](#)https://majorprojects.affinitylive.com/?action=view_job&id=4508Site: [#2445 84-86 Kiora Road, Miranda](#)https://majorprojects.affinitylive.com/?action=view_site&id=2445

18

Diary from Neil Macleod to Simon Truong on 02/02/2012

Diary against Annex [Website Submissions](#) for job #4508 MP 11_0009 Miranda Dental Hospital

Submission Details for Neil Macleod

Email Details

Received 1:05PM, Thu 2nd Feb, 12
Status Actioned on 02/02/2012
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 📧
Class General Details

Interactions

👤 Contacts (1)

Inbound email from:

[Neil Macleod](#)

hey.gringo@gmail.com

👤 Staff (1)

Email to:

[Simon Truong](#)

Disclosable Political Donation: no

Name: Neil Macleod
Email: hey.gringo@gmail.com

Address:
5/18 Drummoyne Avenue

Drummoyne, NSW
2047

Content:
Having viewed the proposal and plans for Miranda Dental Hospital I am writing in support of the planning application.

As a dentist with 8 years experience who has worked both in the UK and Australia in public and private clinics and a hospital setting I feel that the proposed development would benefit patients, staff and the local area.

I work as a general dentist and the opportunity to work closely with specialist colleagues would be beneficial both to my patients, allowing them the highest quality care and to help my own professional education. The proposed education facility would be beneficial both to dentists working in the practise and offer an alternative to courses already run by the Australian Dental Association and Sydney Hospital for the continuing professional development for profession in general.

Beyond the benefits for dentists and patients this will undoubtably offer employment opportunities and economic development.

The building looks attractive on the architectural plans appears to fit in with the local area.

IP Address: comser4.lnk.telstra.net - 165.228.88.203
Submission: Online Submission from Neil Macleod (support)
https://majorprojects.affinitylive.com/?action=view_diary&id=25886

Submission for Job: #4508 MP 11_0009 Miranda Dental Hospital
https://majorprojects.affinitylive.com/?action=view_job&id=4508

Site: #2445 84-86 Kiora Road, Miranda
https://majorprojects.affinitylive.com/?action=view_site&id=2445

19

Diary from to Simon Truong on 02/02/2012

Diary against Annex [website Submissions](#) for job [#4508 MP 11_0009 Miranda Dental Hospital](#)

Submission Details for

Email Details

Received 1:18PM, Thu 2nd Feb, 12
Status Actioned on 02/02/2012
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 📬
Class General Details

Interactions

👤 Contacts (1)

Inbound email from:

[it - Self Employed](#)

👤 Staff (1)

Email to:

[Simon Truong](#)

Disclosable Political Donation: no

Name:

Email:

Address:

Content:

How great it would be for our Shire to have such a state of the art dental facility. We need easier access to dental facilities in this area and the option to have dental procedures locally.

IP Address: -

Submission: Online Submission from (comments)

https://majorprojects.affinitylive.com/?action=view_diary&id=25888

Submission for Job: [#4508 MP 11_0009 Miranda Dental Hospital](#)

https://majorprojects.affinitylive.com?action=view_job&id=4508

Site: [#2445 84-86 Kiora Road, Miranda](#)

https://majorprojects.affinitylive.com?action=view_site&id=2445


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Diary from SAAD AL-MOZANY to Simon Truong on 02/02/2012

Diary against Annex [Website Submissions](#) for job [#4508 MP 11_0009 Miranda Dental Hospital](#)

Submission Details for SAAD AL-MOZANY

Email Details

Received 1:38PM, Thu 2nd Feb, 12
Status Actioned on 02/02/2012
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 
Class General Details

Interactions

Contacts (1)

Inbound email from:

[SAAD AL-MOZANY](#)

saadalmozany@gmail.com

Staff (1)

Email to:

[Simon Truong](#)

Disclosable Political Donation: no

Name: SAAD AL-MOZANY

Email: saadalmozany@gmail.com

Address:

Apt 34

PADDINGTON, NSW

2021

Content:

I think the concept of having a multidisciplinary dental hospital which provides both dental education, general dentistry as well as specialist dental services is excellent. All to often patients are disadvantaged but having to spend time travelling between different specialists for their complex treatments so having all aspects of the dental profession in the same area and under the same roof with be beneficial and advantageous for all the patients and population in the area.

The provision of special needs dentistry to the community is something that is well overdue. There are only 2 centres which provide this service in all of NSW and the Sydney population is in need to a quality centre of excellence where it can be carried out.

The hospital will also provide employment in the area in a time where the economic growth and investment in the local economy is paramount.

I am in full support of this proposed development as I feel that such a hospital will benefit the community in every possible way.

IP Address: comser4.lnk.telstra.net - 165.228.88.203

Submission: Online Submission from SAAD AL-MOZANY (support)

https://majorprojects.affinitylive.com/?action=view_diary&id=25890

Submission for Job: [#4508 MP 11_0009 Miranda Dental Hospital](#)

https://majorprojects.affinitylive.com/?action=view_job&id=4508

Site: [#2445 84-86 Kiora Road, Miranda](#)

https://majorprojects.affinitylive.com/?action=view_site&id=2445

21

Diary from Angelo Mazzaferro to Simon Truong on 02/02/2012

Diary against Annex [Website Submissions](#) for job #4508 MP 11_0009 Miranda Dental Hospital

Submission Details for Angelo Mazzaferro

Email Details

Received 11:11PM, Thu 2nd Feb, 12
 Status Actioned on 02/02/2012
 Time Spent 0:00:00 (hh:mm:ss)
 Priority Medium 📧
 Class General Details

Interactions

👤 Contacts (1)

Inbound email from:

[Angelo Mazzaferro](#) - [Arncliffe Family Health Clinic](#)
 drmazzaferro@gmail.com

👤 Staff (1)

Email to:

[Simon Truong](#)

Disclosable Political Donation: no

Name: Angelo Mazzaferro
 Email: drmazzaferro@gmail.com

Address:
 1-3 Queen Street

Arncliffe, NSW
 2205

Content:
 I wish to voice my support for the application to construct a Dental Hospital @84 - 86 Kiora Road Miranda. In my work as a General Medical Practitioner I daily see the community need for such a facility within the Sutherland & St. George areas. Such a centre would also prove invaluable in the teaching of future Dental Practitioners.

IP Address: 60-242-179-75.static.tpgi.com.au - 60.242.179.75
 Submission: Online Submission from Angelo Mazzaferro (support)
https://majorprojects.affinitylive.com/?action=view_diary&id=25918

Submission for Job: #4508 MP 11_0009 Miranda Dental Hospital
https://majorprojects.affinitylive.com/?action=view_job&id=4508

Site: #2445 84-86 Kiora Road, Miranda
https://majorprojects.affinitylive.com/?action=view_site&id=2445


22

Diary from marnie szeles to Simon Truong on 03/02/2012

Diary against Annex [Website Submissions](#) for job [#4508 MP 11_0009 Miranda Dental Hospital](#)

Submission Details for marnie szeles

Email Details

Received 1:33PM, Fri 3rd Feb, 12
Status Actioned on 03/02/2012
Time Spent 0:00:00 (hh:mm:ss)
Priority Medium 
Class General Details

Interactions

Contacts (1)

Inbound email from:

[marnie szeles](#)

marnii02@optusnet.com.au

Staff (1)

Email to:

[Simon Truong](#)

Disclosable Political Donation: no

Name: marnie szeles

Email: marnii02@optusnet.com.au

Address:

marion Street

gymea, NSW

2227

Content:

support for this

IP Address: c58-107-237-105.mirnd3.nsw.optusnet.com.au - 58.107.237.105

Submission: Online Submission from marnie szeles (support)

https://majorprojects.affinitylive.com/?action=view_diary&id=25928

Submission for Job: [#4508 MP 11_0009 Miranda Dental Hospital](#)

https://majorprojects.affinitylive.com/?action=view_job&id=4508

Site: [#2445 84-86 Kiora Road, Miranda](#)

https://majorprojects.affinitylive.com/?action=view_site&id=2445

(23)

Simon Truong - Miranda Dental Hospital MP11_0009

From: "pauline.cooper" <pauline.cooper@exemail.com.au>
To: <plan_comment@planning.nsw.gov.au>
Date: 1/5/2012 11:22 AM
Subject: Miranda Dental Hospital MP11_0009
Attachments: Dental Hospital.doc

Attention: Director, Metropolitan and Regional Projects South

Re: Miranda Dental Hospital – 84-86 Kiora Road, Miranda. Application Number MP 11-0009

I, Pauline Cooper of 25/32-36 Urunga Parade, Miranda, object to this project.

My objections to the proposed Dental Hospital are outlined in the attached document.

Attention: Director, Metropolitan and Regional Projects South

Re: Miranda Dental Hospital – 84-86 Kiora Road, Miranda. Application Number MP 11-0009

I, Pauline Cooper of 25/32-36 Urunga Parade, Miranda, object to this project.

My objections to the proposed Dental Hospital are two-fold:

1. As a resident of Urunga Pde and a wheelchair user
2. As a disabled person who may wish to use a dental facility said to be designed for special needs people

As a resident of Urunga Parade Miranda, I already experience incredible difficulties as a result of the large number of medical practices in this precinct. Adding another facility will greatly exacerbate the current problems through increasing pedestrian and vehicular volume. It is unacceptable with the current pedestrian infrastructure and traffic management.

I experience incredible difficulties with the following;

- Crossing Urunga Lane because of poor visibility of in-turning traffic (especially when the bus stop is in use) and the steep nonstandard kerb ramps. This is the proposed entry for hospital staff, delivery vans and the disabled and will become even more hazardous.
- Crossing Jackson Avenue at Urunga Parade because of the large volume of traffic which I cannot see from a wheelchair. There are no lights or pedestrian crossings on this busy intersection. Staff vehicles circulating whilst waiting for the car stacker will add to this in the morning peak.
- The high volume of mobility impaired pedestrian traffic in both Kiora Rd and Urunga Pde visiting medical practices in Urunga Pde or Westfield shopping centre. The area has uneven footpaths with narrow non standard kerb ramps. A section of the foot path is too narrow and other sections have bad camber and rough service pits. There are obstacles on the footpath – particularly near Urunga Lane.
- Negotiating the footpath at the busy entrances to the car park and loading dock of Westfields located on the north side of Urunga Parade. Additionally, trucks often reverse into the loading dock almost opposite to Urunga Lane, blocking traffic.

As a disabled person, I am appalled by the apparent lack of facility for disabled clients (a stated clientele) visiting the Dental Hospital.

- There is only one non regulation width disabled parking bay located at the rear of the building which cannot be used until staff have finished using the bay as a waiting area – after 9.30 am or later. Disabled people are expected to disembark into driveway space! This bay is also to be used by delivery vans. This is very unsatisfactory. It is unclear to me if there is a safe, step free pedestrian footpath from this parking bay to the hospital access ramp.
- There is no drop off area for clients. Urunga Lane and the hospital's rear driveway would possibly be used as a drop off/pick up area. Using the street or a driveway is the dangerous practice often used at other Urunga Pde medical facilities which do not provide visitor parking.
- It is appallingly ignorant to think that disabled people and their carers will travel by public transport. We rarely do for a variety of reasons. It is unrealistic to think that other clients who have had surgical treatment will either.
- Parking in the eastern Westfield car parks is unsatisfactory. Lift access is poor or non-existent and parking is already in great demand by clients of the many Urunga Pde medical practices as there is very little street parking.
- There is no disabled toilet facility on level 4 (the special needs level) or level 3. This is discriminatory and not acceptable to me. It is unclear whether wheelchair users can use level 5 bathrooms.

- It is very difficult to find a dentist who can treat a disabled client who cannot transfer from their wheelchair into the dentist's chair. It is unclear whether there is facility to treat a client in their wheelchair or whether there is a hoist to transfer immobile clients.

(24)

Simon Truong - Letter from Debra Townsend of Mallesons re 84-86 Kiora Road, Miranda

From: "George, Alysia" <Alysia.George@mallesons.com>
To: "simon.truong@planning.nsw.gov.au" <simon.truong@planning.nsw.gov.au>
Date: 1/17/2012 3:28 PM
Subject: Letter from Debra Townsend of Mallesons re 84-86 Kiora Road, Miranda
CC: "Townsend, Debra" <Debra.Townsend@mallesons.com>, "Jaku, Marc" <Marc.Jaku@mallesons.com>
Attachments: Letter to Department of Planning.pdf; Letter from Flagship.pdf

Confidential communication

SENT ON BEHALF OF DEBRA TOWNSEND

Dear Mr Truong,

Please see attached letter in regards to the above matter and annexure letter from Flagship Communications.

Regards

Debra Townsend
Partner
9296 2341

Alysia George | Legal Secretary to Debra Townsend
Mallesons Stephen Jaques
Level 61, Governor Phillip Tower, 1 Farrer Place, Sydney NSW 2000
T +61 2 9296 3142 | F +61 2 9296 3999
alysia.george@mallesons.com | www.mallesons.com

MALLESONS STEPHEN JAQUES

Attention: Simon Truong

Department of Planning & Infrastructure
23-33 Bridge Street
SYDNEY NSW 2000
Email simon.truong@planning.nsw.gov.au

17 January 2012

Dear Sir

**Exhibition of Environmental Assessment for Development of a Dental Hospital
84-86 Kiora Road, Miranda (MP11_0009)
Correspondence from Flagship Communications on behalf of the Applicant**

We act for Westfield Limited in respect of its consideration of the above Project Application, which is presently being exhibited by the Department of Planning and Infrastructure.

Please find enclosed a letter that our client has received from Flagship Communications ("Flagship") on behalf of the Applicant. It appears that the enclosed letter was part of a widespread letter drop in the Sutherland Local Government Area in relation to the subject proposal. Our client is concerned about both the fact that the Flagship letter has been distributed and about the information contained in the letter from Flagship. The letter has the potential to mislead the public and affect the assessment of the Applicant's Project Application.

Misleading information contained in Flagship's letter includes advising members of the public that to have their say with respect to the proposal they may complete a submission on one of Flagship's own forms provided or log on to the Department of Planning and Infrastructure's website. Alarming, Flagship's letter omits to advise that preparing a submission on the form provided by Flagship and sending it to Flagship in any of the three ways invited will not constitute a formal submission in respect of the proposal because it will not have been received by the Department of Planning and Infrastructure. In fact, Flagship advises that a report will be forwarded to the Department of Planning and Infrastructure for consideration rather than forwarding the actual submissions themselves within the required time. No information is provided with respect to the said report, including its intended author, whether it be Flagship, the Applicant or someone else.

Further, limited information with respect to the proposal is provided, with a description of the application which does not properly or adequately describe the project proposed. By way of example, the Flagship document describes the proposal as including 43 car parking spaces but fails to mention that these spaces are provided by way of a mechanical car stacker and that they will not be accessible by patients or visitors to the site.

MALLESON'S STEPHEN JAQUES

Department of Planning & Infrastructure

17 January 2012

Public consultation is one of the cornerstones of the NSW Planning System. This is recognised in section 75H and 75X(5) of the *Environmental Planning and Assessment Act 1979 (NSW)*.

The Flagship letter drop is an action that could already have led to widespread confusion and must be rectified in order to avoid prejudice to members of the public and an invalid assessment process. The risk that a member of the public will be misled with respect to the proposal and not have the opportunity to have their concerns properly considered by the Department of Planning and Infrastructure is very serious.

Please find following our suggestions of how the Department of Planning and Infrastructure should urgently seek to resolve this issue:

- 1 The Department of Planning and Infrastructure should write to all those who received the letter from Flagship and correct the misinformation/omitted information with respect to making submissions and encourage a review of the exhibited materials;
- 2 The Department of Planning and Infrastructure should require Flagship to forward all actual submissions received by it to the Department of Planning and Infrastructure;
- 3 The Department of Planning and Infrastructure should require Flagship to prepare a very short letter which simply apologises for any misleading information provided, makes it clear that the actual supporting application documentation should be consulted and advises that all objections must be sent to the Department of Planning and Infrastructure or risk not being considered by the Department of Planning and Infrastructure. The Department of Planning and Infrastructure should proof read any such letter before it is issued to the public; and
- 4 The exhibition period should be extended to allow for the above to take place without prejudicing any person who may have been misled by Flagship's conduct.

Yours faithfully



Debra Townsend

Partner

Direct Line +61 2 9296 2341

Email debra.townsend@mallesons.com

Encl. 1



Flagshipcommunications

ABN 85 092 839 177

GPO Box 1210

Sydney NSW 2001

Phone 1300 96 37 96

www.flagship-communications.com



Dear Resident/business owner,

I am writing to you about the proposed dental hospital at 84-86 Kiora Road, Miranda.

Our company Flagship Communications has been engaged by the applicant to consult with the community about the proposed hospital.

The aim of the consultation process is to inform you about the proposed development and to provide you with an opportunity to have your say.

Information about the proposed dental hospital is outlined in this brochure. Further details are available by; visiting Sutherland Council Administration Centre, logging on to the Department of Planning and Infrastructure web site, or by calling our information line on 1300 665 310.

To have your say, complete the form on the back page of this brochure or log on to the Department of Planning and Infrastructure web site
<http://majorprojects.planning.nsw.gov.au>.

All submissions must be received by 5pm on 2nd February 2012.

Once the consultation is complete, a report will be prepared and forwarded to the Department of Planning for consideration.

To know more about either the proposal or consultation process please call 1300 665 310.

Yours sincerely,

Jeff Egan
Director

PROJECT OVERVIEW

Gentle Dental Care is seeking approval for the demolition of the existing building on the site and construction of a seven-storey dental hospital with three levels of underground car parking at 84 to 86 Kiora Road, Miranda.

The application has been lodged with the NSW Department of Planning and Infrastructure for assessment. As part of the assessment process the community has been given 49 days to provide comment.



Artists impression of proposed building

PROPOSAL

Gentle Dental Care is proposing to build a state of the art, purpose built dental hospital.

The hospital will include the following facilities:

- Day surgery and consulting rooms
- Accommodation rooms for patients who are receiving cosmetic dental care, facial reconstruction and other major surgery.
- Accommodation rooms for special needs patients and their carers
- Research facilities
- Teaching facilities
- Cafe
- General anaesthesia theatre.

The proposed hospital will be the only building in Sydney to accommodate a wide range of dental and oral health professionals under one roof. Medical professionals based in the hospital will include; Dentists, Oral Surgeons, Orthodontists, Endodontists, Periodontists and Implantologists.



Existing buildings on site



Artists impression of proposed building

LOCATION

The proposed dental hospital will be located at 84 to 86 Kiora Road Miranda, with frontages to Kiora Road, Urunga Parade and to Urunga Lane. This site has been selected because it is close to public transport including Miranda railway station and bus interchange.

The site is currently occupied by a plain two-storey brick and tile roof commercial building with a "bottle shop" on the ground floor. A view of the current building is shown to the right.



PARKING

The proposed dental hospital will include 43 underground parking spaces and one disabled car parking space at ground level. It is not expected to impact on existing parking arrangements.

TRAFFIC MANAGEMENT

Vehicles will access the underground car park from Urunga Lane at the rear of the proposed hospital. To determine potential impacts on traffic a comprehensive traffic study has been completed. This study found that the hospital would have minimal impact on local traffic conditions.



COMPLIANCE

A number of studies have been completed to determine potential impacts on the environment, local economy and the community. These studies include; traffic studies, environmental impact assessments, shadow diagrams, stormwater management plans and a range of other reports. These reports are available for viewing at either the Sutherland Shire council Administration Centre or on Department of Planning and Infrastructure's web site, (<http://majorprojects.planning.nsw.gov.au>).

SUBMISSION FORM

Contact Details

Name:

Street Address:

Email Address:

Phone number:

YOUR VIEW

Please place a tick next to one of the boxes.

- ☐ Support development
- ☐ Oppose development
- ☐ Unsure
- ☐ Would like more information

Reasons for position

Further comments

HOW TO LODGE YOUR SUBMISSION

Submissions can be lodged the following ways:

EMAIL

mirandadental@flagship-communications.com

FAX

02 9262 3985

MAIL

GPO Box 1210
Sydney NSW 2001



Flagshipcommunications

GPO Box 1210

Sydney

NSW 2001

Jeff Egan

DIRECTOR

PHONE 1300 963 796

FAX (02) 9262 3985

MOBILE 0425 340 044

jeff@flagship-communications.com
www.flagship-communications.com



Our Ref: 11-214

19th January 2012

Major Projects Assessment
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001



Attention Mr Simon Truong

Dear Sir

RE: Major Project Application MP11_0009 for a Proposed Dental Hospital at 84-86 Kiora Road Miranda

This submission to MP11_0009 proposing development of a large 7 storey dental hospital with basement car parking is lodged on behalf of our client Westfield Management Limited, owners of the Westfield Miranda Shopping Centre. Our client's major shopping centre and associated car parking is located nearby in Kiora Road, opposite to the west and north of the proposed development.

By way of summary, our submission raises no objection to the concept of developing an appropriately sized dental hospital on the subject land. However, significant concerns are expressed with regard to the lack of off-street parking proposed for the development at the scale proposed and the likely impacts of the development's failure to provide adequate and appropriate parking provision, including direct impacts on the Westfield Miranda Shopping Centre, businesses within that Centre and visitors to the Centre.

We note that 44 off-street staff car spaces are proposed, utilising a mechanical car stacker. Additional parking, including parking for some patients should be provided. Allocating all but one of these car spaces to staff, with the remaining space to be used prior to 9.30am as a waiting bay and after 9.30am as both a disabled space and loading bay, resulting in no spaces being provided for patients or visitors to the dental hospital is inappropriate, as is the use of a mechanical stacker as the sole method of access to car parking.

Insufficient Car Parking Spaces to Meet demand

We have inspected the site and locality, reviewed the Major Project Application and supporting reports and the Council planning instruments, including the Sutherland LEP and DCP. We consider that approval of a large dental hospital centre, without adequate off-street parking, in a precinct within the Miranda Town Centre where it is difficult to obtain on-street parking in close proximity to the proposed development, to be unacceptable and contrary to good town planning practice, as well as being contrary to the Sutherland Shire Council's planning controls.



It is fundamental to proper urban planning in intensively developed centres, such as Miranda, for new development to provide adequate parking.

The Environmental Assessment submitted with the application over-estimates the number of employees and patients who will access the site by public transport. The proposed on-site car park includes 1 car space for each dentist/doctor (28 in total), 14 car spaces for the 58 staff to be employed, 1 car space for the proposed 41m² ground floor shop and only 1 car space for dental hospital patients. We understand that this patient car space will be reserved as a waiting bay before 9.30am and as a loading bay after 9.30am and, when not being used for loading purposes, will be available for disabled parking only. There will effectively be no patient parking provided and less than 25% of employees, other than dentists/doctors, will have access to on-site parking.

Existing on-street parking on Urunga Parade and Kiora Road, within convenient walking distance of the proposed dental hospital is close to capacity during the primary hours the dental hospital will operate. This constrained on-street parking situation has not been given sufficient weight in the Environmental Assessment Report submitted with the Major Project Application.

The proposed dental hospital will service the dental needs of the residents of Sutherland Shire and beyond. It is unrealistic to assume that all patients and 75% of employees, other than dentists/doctors will utilise public transport, bicycle or walking to access the proposed dental hospital.

Sutherland Shire Council's car parking controls are similar to other parking controls for town centre areas in that they already acknowledge that a percentage of staff and visitors/patients will travel to the Miranda Town Centre by public transport. These controls do not require that every staff person or visitor on the site at any one time be provided with a car space. The converse of this is also true. The controls do not (nor could they) require that every staff person or visitor to the site must travel by public transport instead of private vehicle. There will be some parking demand for staff and visitors to the dental hospital and the development should make provision to accommodate that demand on site.

Our client's traffic consultant Colston Budd Hunt & Kafes Pty Ltd (CHBK) has reviewed the proposed development and the accompanying traffic and parking report. A copy of CHBK's assessment of the traffic and parking implications associated with the development is attached at **Appendix 1**.

Use of a Mechanical Car Stacker

All car parking proposed is accessed via a mechanical car stacker, which appears to require at least 10 metres or more of excavation and is designed to take cars from Urunga Lane, move them into the basement and then into parking bays. Only one car at a time can be accommodated by the lift and stacker and there is space for only 1 vehicle to wait on-site for the stacker to return to take the next vehicle.

Having regard to the number of car bays proposed and taking into account the time associated with accessing car spaces in the basement, the mechanised stacked parking system is likely to result in cars queuing at the car park entry off Urunga Lane. There is insufficient information submitted with the application to enable assessment of the degree to which waiting times and/or vehicle queuing distances for vehicles seeking to enter the basement car park is likely to result in obstruction of traffic in Urunga Lane and Urunga Parade.



The mechanical stacker system is proposed as a consequence of the very small site area and the significant amount of floor space sought to be accommodated on the site. It is unreasonable to justify provision of reduced off-street parking because the proponent claims site constraints prevent provision of parking in accordance with the Council's parking standards. The proposal seeks approval for 1,938.3m² on a site of 490.5m², equating to a floor space ratio (FSR) of 3.95:1, some 58% greater than the maximum 2.5:1 FSR permitted for the site pursuant to Sutherland LEP 2006.

So far as can be determined, Sutherland Council has consistently applied the maximum 2.5:1 FSR standard in Miranda and there are no justifiable reasons why compliance with this development standard is unreasonable or unnecessary. Indeed the inadequate provision of off-street parking and the use of the mechanical stacker arises from exceeding the FSR standard.

A reduction in the size of the development to a complying FSR of 2.5:1 would result in a development with a much reduced demand for parking, which would be able to be better accommodated on the site. Alternatively, additional basement car parking levels should be provided with adequate area for queuing and appropriate loading dock so that additional spaces can be accommodated on the site, with those spaces also accessible to non-dentist staff and to patients and visitors to the site.

There is an opportunity for the subject land to be re-developed in conjunction with the adjoining properties at No's 88-90 and No. 92 Kiora Road, to create a more appropriately sized development lot, capable of accommodating a larger scale development and with potential to create a more attractive building, improved urban design outcomes and adequate off-street parking, which is more accessible than parking serviced by a mechanical stacker.

At a minimum, the design should be modified to provide additional basement car parking levels and a more user friendly parking design, with the number of car spaces increased to provide some patient parking, without the need for parking stackers. An increase in parking to allow for at least 12 patient/visitor car spaces referred to in the Applicant's traffic report and some additional "non-dentist/doctor" staff parking would ensure adequate parking for the proposed development.

Likely Impact on Westfield Miranda Shopping Centre Car Park

Westfield currently provides car parking for tenants, workers and shoppers of the Westfield Miranda Shopping Centre. Westfield has recently received approval from the Council for a redevelopment of the shopping centre which will increase the number of parking spaces provided, commensurate for the demand for parking generated by the development. There are currently no boom gates or other controls on the length of stay in the Westfield car park and it seems likely that a number of staff, patients of and visitors to the proposed dental hospital who are not provided with parking on the hospital site, will utilise the Westfield car park instead.

Westfield has also recently obtained development consent for the introduction of a controlled parking scheme in the redeveloped car park. One of the matters which Westfield is seeking to address by the introduction of controlled parking is unauthorised and inappropriate use of its car park by workers in commercial buildings in the Miranda centre.



The approval for controlled parking requires provision of a 3 hour free parking period for visitors to Westfield Miranda. The availability of this free period would mean that even once the controlled parking system is implemented following the redevelopment of Westfield Miranda, patients of and visitors to the proposed dental hospital would use the parking which Westfield has provided. Such an outcome is contrary to Westfield's existing development consent, which requires that parking provided is for staff and customers of Westfield Miranda.

Westfield's car park is not a public car park and Westfield's car park should not be seen as a parking resource for the use of other developments in the Miranda Town Centre. The additional burden of parking being used in conjunction with the dental hospital will in turn have adverse effects on tenants of Westfield who through the rent they pay expect to have the parking area reserved for their customers.

Conclusions

Major Project Application MP_11/0009 should not be approved in the form currently proposed, as insufficient off-street parking is provided. Approval of the proposal in its current form is an over-development of the site and will exacerbate the existing constrained supply of parking in the Miranda Town Centre. As a consequence it may be expected that some staff and many of the patients will inappropriately use our client's nearby Westfield Miranda Shopping Centre car park whilst attending the proposed dental hospital, due to the limited supply of conveniently located on-street parking nearby in Kiora Road and Urunga Parade.

The application should be amended to incorporate additional off-street car parking, including additional spaces for patients/visitors, or the scale of the development significantly reduced to a complying FSR of 2.5:1 and accessibility to the car spaces enhanced, so that the proposed 44 car spaces are sufficient to meet reasonable staff and patient parking demand.

Please contact the undersigned should you require any further information or clarification of the issues we have identified.

Yours faithfully

Nick Juradowitch

Director

INGHAM PLANNING PTY LTD

Appendix 1: Correspondence dated 19 January 2012 from Colston Budd Hunt and Kafes relating to the proposed development of a dental hospital at 84-86 Kiora Road, Miranda.

CC: General Manager Sutherland Shire Council

Colston Budd Hunt & Kafes Pty Ltd

as Trustee for C & B Unit Trust
ABN 27 623 918 759

Our Ref: TR/8546/ek

19 January, 2012

Transport Planning
Town Planning
Retail Studies

Westfield Design & Construction Ltd
PO Box 4004
SYDNEY NSW 2001

Attention: Lillian Fadel

Email: LFadel@au.westfield.com

Dear Madam,

**RE: REVIEW OF PROPOSED DENTAL HOSPITAL,
84-86 KIORA ROAD, MIRANDA**

1. As requested we have reviewed the traffic and parking aspects of the proposed dental hospital at 84-86 Kiora Road, Miranda. We have also reviewed the traffic assessment prepared by Traffix that accompanied the project application (Transport and Accessibility Study, May 2011).
2. As set out in the introduction of the Traffix report, the project application seeks approval for the construction of a seven storey commercial building. It comprises a total of 1,659m² of net usable floor space, generally for the purpose of dental uses and ancillary retail (some 41m²) with car parking for 44 cars (43 located in a mechanical stacker). Vehicular access is proposed from Urunga Lane (located on the eastern boundary of the site).
3. Our review has identified a number of issues with the proposed development. These include:
 - inadequate parking (including no provision of a set down/pick up area and ambulance parking);
 - access to and operation of the proposed mechanical car stacker; and
 - no provision for on-site servicing.

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Parking

4. It is proposed to provide 44 parking spaces with 43 parking spaces located in a three level mechanical stacker in the basement and one shared disabled space/loading, accessed from Urunga Lane. We raise the following matters with regard to parking:
- no on-site parking is provided for visitors or patients. While the site has good access to public transport, it is unrealistic to expect all patients or visitors to travel by means other than car. Therefore an assessment of visitor/patient parking requirements should be undertaken and appropriate on-site parking provided. If no on-site parking for visitors/patients is provided, it is likely that these users will park within the nearby Westfield car park. This is inappropriate and inconsistent with planning principles (that a new development should make use of parking in another development);
 - no provision for a set down/pick up area. A set down/pick-up area is generally provided for hospitals and large medical centres to provide for the easy pick up or drop off of patients or visitors;
 - no provision of ambulance parking. The proposed development makes no provision for ambulance parking and does not detail how patients would be collected in an emergency situation or for patient transfer;
 - shared disabled parking space/loading available only after 9.30am. The Traffix report states that this space would only be available after 9.30am as prior to this time it would be used as a waiting bay for access to the mechanical car stacker. No information is provided as to how disabled parking will be provided prior to 9.30am. Also no information is provided on disabled parking for staff. It is noted that the disabled space does not comply with the width requirements of AS2890.6-2009;
 - no information is provided as to how the shared use of the disabled space/loading will be managed.

Operation of the Mechanical Car Stacker

5. Access to the three level mechanical car stacker is proposed from Urunga Lane with a waiting bay provided on the southern side of the access and a disabled space located on the northern side of the access. The Traffix

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report notes that the disabled space would be used as a waiting bay prior to 9.30am.

6. We raise the following matters with regard to the mechanical car stacker:
- the queuing assessment undertaken by Traffix for the operation of the car stacker is based on the provision of 2 waiting bays, a service rate of 90 seconds and a traffic generation of 18 vehicles per hour (two way). No information is provided to support the assumed service rate and traffic generation. However, using these rates the Traffix queuing assessment finds that the 98% queue cannot be accommodated on site as suggested by AS2890.1-2004. Higher traffic generation or slower service rates would exacerbate this non-compliance;
 - no information is provided on how access to the mechanical stackers will be controlled (that is, how will an arriving car know whether to wait in front of the access or use a waiting bay). We note that the waiting bays are located in a position where a car could not drive directly into the car lift. It would have to reverse back into Urunga Lane. This is not considered appropriate and would increase the service time;
 - the proposed access arrangements have the potential for cars to queue back onto Urunga Parade (due to delays in accessing the car stacker). Given the sites location adjacent to the bus interchange and high pedestrian activity along the southern side of the Urunga Parade, any queuing could have unsatisfactory impacts on bus operations and pedestrian safety; and
 - no information is provided on contingencies that are provided, should the mechanical stacker breakdown. As all but one space is located in the stacker, a breakdown would have a major impact on parking provision.

Servicing

7. No provision is made for on-site servicing with the Traffix report suggesting that this could be accommodated on Urunga Parade. This is inappropriate as the proposed development will require substantial servicing, including medical supplies, laundry, food and beverages, and waste collection (including hazardous medical waste). A dedicated on-site service bay is required to accommodate these servicing requirements.

Colston Budd Hunt & Kafes Pty Ltd

Summary

8. In summary our review has found a number a traffic and parking matters that are of concern with regard to the proposed development. These are:
- inadequate parking (including no provision of a set down/pick up area and ambulance parking);
 - access to and operation of the proposed mechanical car stacker; and
 - no provision for of on-site servicing.
9. Until these matters are addressed through the provision of additional information or redesign, it is our view that the proposed development should not be approved in its current form as it would lead to significant adverse traffic and parking impacts.
10. We trust the above provides the information you require. Finally, if you should have any queries, please do not hesitate to contact us

Yours faithfully,

COLSTON BUDD HUNT & KAFES

A handwritten signature in black ink, appearing to read 'Tim Rogers', with a stylized flourish at the end.

Tim Rogers

Director

(25)

**Simon Truong - Miranda Dental Hospital Development at 84-86 Kiora Road, Miranda
(Application No: MP11-0009)**

From: Lynne Odewahn <Lynne.Odewahn@bdo.com.au>
To: "simon.truong@planning.nsw.gov.au" <simon.truong@planning.nsw.gov.au>
Date: 8/02/2012 1:47 PM
Subject: Miranda Dental Hospital Development at 84-86 Kiora Road, Miranda (Application No: MP11-0009)

Dear Mr Truong

I discussed with you this morning by phone my concerns regarding this development and would like to point out the following:

1. I have observed that there is a proposed 3 level underground carpark which is going to cause damage to my building (50-52 Urunga Parade, Miranda) as the construction of the carpark will cause vibrations and subsequently disturb the footings of my building as this building is sitting on clay.
2. Due to the construction, my tenants will have their accessibility affected to my building as the laneway is only wide enough for 1 vehicle at a time.
3. The shadow cast over my building will also affect my tenants natural light.

I would appreciate having a meeting with you on site to further discuss my concerns as it is too hard for me to put it in writing. If you have any correspondence to me by e-mail could you please direct it to Lynne Odewahn of BDO – lynne.odewahn@bdo.com.au.

Yours sincerely

Vince Palmieri
Palmieri Developments Pty Limited
50-52 Urunga Parade
Miranda NSW 2228

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