Response to submissions – St George Stage 2, Acute Services Building

Agency/Private	Submission/Comments	Proponent's Response
DPE	Further justification be provided regarding the overshadowing impacts on adjoining residential development with consideration of the access to sunlight planning principle, including providing further detailed analysis of the level of impact on affected living rooms and private open space areas.	Health Infrastructure's architects have conducted a detailed solar study of the properties impacted by potential loss of sunlight as a result of the construction of the ASB. This study looked at the impact on habitable windows and private open space. Private open space is defined in the Standard Instrument – Principal Environmental Plan as "an area external to a building (including an area of land, terrace, balcony or deck) that is used for private outdoor purposes ancillary to the use of the building". For the purposes of the solar study it was considered as balconies in residential flat buildings and rear yards in houses, which is consistent with this definition. The Apartment Design Guide (Department of Planning and Environment, 2015) provides a guideline for apartment builders to comply with SEPP65. In terms of solar access it states that living rooms and private open spaces of at least 70% of apartments in a building should receive a minimum of 2 hours direct sunlight between 9am and 3pm at mid-winter in the Sydney Metropolitan Area. The properties analysed were the existing dwellings (houses and flat buildings) along Gray Street and Ocean Street. Summary of the Findings The results of the analysis show that while a number of properties lose some sunlight to habitable rooms in midwinter as a result of the proposed ASB, no property has less than three (3) hours of sunlight to areas of private open space.

Agency/Private	Submission/Comments	Proponent's Response
		33-37 Gray Street Eleven (11) units within the building at 33-37 will receive no sunlight to "a habitable room" (based on window locations) during the period 9am to 3pm on 21 June. Of these properties two (2) receive no sunlight under existing conditions and eight (8) lose the one hour they would have received. Unit 17 loses one (1) hour but still retains one (1) hour. Unit 15 loses two (2) hours.
		All of the units within this building lose one (1) hour of sunlight from their private open space but maintain at least three (3) hours of sunlight midwinter.
		39-41 Gray Street The units within this block lose between one (1) and two (2) hours sunlight to their habitable room windows but all retain a minimum of two (2) hours sunlight following development of the ASB. None of these units will lose sunlight to their private open space retaining the three (3) hours they already receive
		Other properties in Gray Street. Of the eight (8) properties impacted by the proposed ASB, all but three (3) (27, 29 and 31 Gray Street) will retain more than two (2) hours sunlight to their front windows. All of these properties have shading devices (either verandahs or shade hoods over their windows. 27 Gray Street is owned by NSW Health and is not used as a residence.
		All of the houses in Gray Street retain in excess of three (3) hours of sunlight to areas of private open space.
		Properties on Ocean Street The ASB will overshadow properties from 6 to 24 Ocean Street at 9am at midwinter however the shadow has largely moved on

Agency/Private	Submission/Comments	Proponent's Response
		from these properties by 10am and by 11am there are no overshadowing impacts. Properties at 22 and 24 Ocean Street are already overshadowed at 9am from the existing hospital buildings.
		None of the properties on Ocean Street receive less than four (4) hours of sunlight in midwinter.
		On the basis of the detailed analysis above, there are no properties where at least two (2) hours of sunlight cannot be achieved in habitable room or areas of private open space consistent with the sunlight standard.
		Solar analysis undertaken for all properties in Spring, Summer and Autumn indicate that while there is an increase in shadow between 9 and 11, all properties will still retain at least 2 hours of sunlight during the day at these times of the year. (see attached).
		On that basis, the overshadowing impacts are considered to be acceptable.
EPA	Air Quality	
	 The environmental impacts associated with off road diesel equipment can be a major source of fine particles. The EPA recommends that the proponent assess the environmental impacts associated with heavy vehicles including off road diesel equipment and plant used in the construction of the project. This should include but is not limited to: Compliance with relevant and current emission standards as prescribed in Australian Design Rules for heavy duty engines and vehicles. Strategies for minimising air emissions from off road diesel equipment including but not limited to graders, bulldozers, loaders etc. 	Noted

Agency/Private	Submission/Comments	Proponent's Response
Agency/i iivate	Confirmation that all off road diesel equipment will meet best available diesel emissions standards or be fitted with an appropriate diesel exhaust treatment device where possible.	1 Topolient 3 Nesponse
	The proponent should commit to:	
	 Minimising dust emissions from the site, and Preventing dust emissions from the site. 	Noted Noted
	Noise and Vibration Acoustic Assessment Reference is made to the acoustic assessment undertaken by Acoustic Logic (document reference 20150944.1/2207NRO/OF).	
	 The EPA raises the following concerns: Background monitoring appears to have been taken at two locations: Gray Street in 2012 and 16 Hogben Street, Kogarah in 2014. Both sets of measurements do not appear to meet the NSW Industrial Noise Policy (INP) requirements for 7 days of valid data. 	Noted. Since submitting the report, an additional 7 days of noise logging (as per EPA requirements) has been conducted with the monitor installed on the roof of the Gray Street car park (and will be indicative of the ambient noise levels on at the residences on the other side of Gray Street). The recent logging meets all EPA requirements.
		Based on the new logging, noise emission goals remain the same as those from the original report (56dB(A)-Daytime, 50dB(A)-Evening and 39dB(A)-Night).
		Acoustic Logic has advised that for background noise level monitoring, provided the monitor is not located in the immediate proximity of a noise source, the result will not tend to vary from

Agency/Private	Submission/Comments	Proponent's Response
		one side of the road to another. The logger position is therefore still indicative of the background noise level on the other side of the road. However attended noise measurements on both sides of Gray Street were taken to ensure that this was the result.
	The Gray Street Noise Monitoring Location 1 in the aerial photograph on page 5 is not a residential location and the noise logging data in Appendix 1 indicated that the night-time L90 levels may have been influenced by plant operating in the vicinity.	The residences on Gray Street are already impacted to a small degree by mechanical plant noise. This was identified in the Acoustic Logic report, and noise emission goals adjusted in the manner required by the INP for sites impacted by pre-existing mechanical plant noise (and hence the design goal of 39dB(A) at night time).
	The Hogben Street Noise Monitoring Location 2 in the aerial photograph on page 5 is in a Mixed Use zone and its relevance to the assessment is not clear.	The Hogben Street monitor was used only to illustrate it was consistent with the 2012 noise logging.
	As the background noise level measurements do not appear to have been undertaken in accordance with the INP the assessment criteria derived for the development may be inappropriate. The background monitoring results were used as the basis for assessing construction and operational noise impacts.	The supplementary noise monitoring confirmed that the background noise levels and the noise emission goals used in the EIS acoustic report are in fact correct, and appropriate for use in setting noise emission goals for the site.
	The EPA recommends the proponent either:	
	Undertake background monitoring measurements again in accordance with the INP including 7 days of valid data. Measurements should be taken at the potentially most affected residences and other sensitive receivers impacted by the development (both the new Acute	Health Infrastructure (HI) agrees to accept the EPA's recommended 45dB(A) noise emission goal (based on an assumed night time background noise level of 40dB(A), rather than undertake further noise monitoring.
	Services Building and the extension to the car park on Gray Street). The following actions should then be undertaken: The predicted impacts of the development should	On the basis that the EPA has not nominated daytime and evening noise emission goals, HI assume that these would be 50dB(A) for the evening and 55dB(A) for the daytime.

Agency/Private	Submission/Comments	Proponent's Response
	 be assessed against the new background monitoring data. Predicted exceedances of the relevant INP and Interim Construction Noise Guidelines (ICNG) criteria should be addressed. All feasible and reasonable mitigation measures should be implemented to meet the relevant criteria. The ING and ICNG provide guidance on mitigation measures. OR: As an alternative to undertaking new background monitoring measurements the proponent may choose to accept the EPA's nominated night time criterion of 40dBA Leq(15min). Plant and equipment associated with the proposed redevelopment (e.g. air conditioning, chillers, cooling towers, fans, substations, and generators or back-up generators) would then need to be designed, and operate, so that noise as a result of their operation does not exceed a total noise level of 45dBLAeq(15min) at the potentially most affected noise sensitive receiver. This includes with the addition of any applicable modifying factor corrections, as per Section 4 of the INP. 	The Industrial Noise Policy (INP) expressly excludes generators as a noise source covered by the INP. On that basis and as generators are only used in an emergency or when they are being tested, HI suggests that the level for emergency generator use be set at BG+5dB(A) for night time and BG+10dB(A) for daytime and evening. This reflects the superseded Noise Control Manual which can be used as guidance. In reality, the back-up generator will not be used at night unless there is an emergency and therefore is an unlikely occurrence. At this stage the actual plant has not been selected however the level of noise emission will be a key consideration in that process.
	Construction Management Plan	
	Section 15.1 of Appendix J Preliminary Construction Management Plan (p.9) states: Noise from any of the site areas will not exceed the limits setout in the <i>Noise Control Act 1975</i> . No machine will work outside the normal working hours previously described, unless prior approval has been granted by the local consent authority.	Noted and accepted.

Agency/Private	Submission/Comments	Proponent's Response
Agency/Private	Demolition and excavation works shall comply with Australian Standard 2436-1981 "Guide to Noise Control on Construction, Maintenance and Demolition Sites". The Noise Control Act 1975 has been repealed and Australian Standard 2436-1981 has been superseded. The EPA recommends construction be undertaken in accordance with: • the Interim Construction Noise Guideline (ICNG) (2009), and • Assessing Vibration: a technical guideline (2006). Construction Hours Hours of construction are provided in Section 5 of Appendix J Preliminary Construction Management Plan (p.4). The proposed construction hours for Saturdays are 7:30am to 3:30pm. This is starting half an hour earlier and finishing two and a half hours later than the standard construction hours provided in the ICNG. The EPA is concerned that clear justification for these out of hours works has not been provided and the proponent does not appear to have undertaken consultation, regarding extended construction hours, with surrounding residents or St Patrick's Primary School. The EPA recommends the proponent be required to comply with the standard construction hours provided in Table 1 of Chapter 2 of the ICNG except in the circumstances outlined below and extrapolated on in part 2.3 of the ICNG:	The recently completed Emergency Department at St George Hospital was constructed during the hours of 7am and 5pm Monday to Saturday. During this period all noise complaints were satisfactorily managed. On that basis, HI is of the view that construction hours of 7.00am to 5.00pm on Saturday are appropriate for this project. The longer construction hours on a Saturday while there are no children in school is a responsible way to ensure that construction progresses without impacts on nearby schools.
	The five categories of works that might be undertaken outside the recommended standard hours are:	

Agency/Private	Submission/Comments	Proponent's Response
Agency/Private	 the delivery of oversized plant or structures that police or other authorities determine require special arrangements to transport along public roads emergency work to avoid the loss of life or damage to property, or to prevent environmental harm maintenance and repair of public infrastructure where disruption to essential services and/or considerations of worker safety do not allow work within standard hours public infrastructure works that shorten the length of the project and are supported by the affected community works where a proponent demonstrates and justifies a need to operate outside the recommended standard hours. Queuing and idling construction vehicles Community concerns may arise from noise impacts associated with the early arrival and idling of construction vehicles at the development site and in the area surrounding the site. The EPA recommends the proponent be required to ensure construction vehicles do not arrive at the project site or in surrounding areas outside approved construction hours. Water Quality In Section 5.9 of the Development Application and Environmental Impact Statement (p.51) it states: A Construction Management Plan (CMP) will be prepared by the Main Contractor appointed for the ASB project and will address a range of environmental control measures to be considered during the construction process including sediment, erosion and dust. 	Noted. This will form part of the Construction Traffic Management Plan

Agency/Private	Submission/Comments	Proponent's Response
	The EPA recommends that the proponent provide an erosion and sediment control plan developed in accordance with Managing Urban Stormwater Soils and Construction, 4 th Edition published by Landcom (the 'Blue Book').	Noted. The CMP will include an erosion and sediment control plan to be developed in accordance with the Blue Book.
Ausgrid	11,000 volt cables and substation will be impacted by the proposal	Consultation has already taken place with Ausgrid as part of the Schematic Design phase. Connection applications have been lodged and Design Information Packs have been issued by Ausgrid (references SC06247 dated 21 November 2014 and SC06699 dated 9 April 2015) dated its order of the second sec
	132,000 volt cables and 33,000 volt gas pressurised cables, which reside in the vicinity of the proposed development. Whilst these may not be directly affected by the current proposal, it is anticipated that future car park development along Kensington Street will impact these cables due to construction vibration	2015) detailing their specific requirements for the works. While the future car park development along Kensington Street is not part of this application, HI acknowledges Ausgrid's concerns and consultation will take place as part of any future development activity.
Kogarah Council	Council raises no objection to the DA for the acute services building above the existing ED, however as the proposed development is at a key entry point into the Kogarah Town Centre and will experience high pedestrian traffic, consideration should be given to upgrading the footpath and streetscape adjacent to the hospital development to a standard consistent with the rest of the Kogarah Town Centre Precinct.	HI has received further information from Council in respect to the landscape treatments requested. HI will meet Council's DCP requirements in respect to footpath treatment where footpath replacement is required.
	Consideration should also be given to the development of an appropriate wayfinding strategy and signage in and around the hospital, and at key points along the Gray Street frontage.	Council's statement regarding wayfinding and signage is noted. New "totem pole" wayfinding signs have recently been introduced on Gray Street as part of the Emergency Department project.

Agency/Private	Submission/Comments	Proponent's Response
	 Comments/draft conditions from Council's Traffic Engineer are: The Traffic Committee has approved a "Works Zone" for construction on Gray Street for a period of 2 years so they are aware of the works. 	Noted
	 What is the outcome for pedestrian refuges on Gray Street that were to be reconstructed? Is there be any opportunity to consider an additional turning lane at the intersection of Gray Street and Princes Highway where there is land dedication on Gray Street, as part of the redevelopment? 	Pedestrian refuges on Gray Street that were removed to facilitate construction of the ED building will be reconstructed as part of the works. The potential for additional works to the intersection is subject to land dedication, as well as detailed traffic studies around this intersection relating to all traffic using the area.
	 Draft Conditions A Construction Management Plan shall be submitted to Council for approval prior to demolition or construction commencing An updated parking strategy shall be considered when the peak parking demand exceeds the on-site supply in 2022. This shall include recommendations to better manage staff parking such as a green travel plan, carpooling and additional bicycle parking and promotion of public transport measures. The proposed extension of the "No Stopping:" zone at the Kensington Street / Montgomery Street intersection will require Council to submit a report to the Kogarah Local Traffic Committee for approval. This implementation is subject to approval from the Traffic Committee. 	HI does not propose to initiate work to this intersection, noting the minimal impact generated by the ASB Redevelopment as detailed in the Arup traffic study. Accepted. Accepted. Accepted.

Agency/Private	Submission/Comments	Proponent's Response
OEH Heritage Office	The current setback between the southern elevation of the Fire Station and the subject site should be maintained. This setback is considered appropriate to enhance the physical and visual prominence of the Fire Station with its corner setting	The setback as per the exhibited plans will be maintained
	The setback will also mitigate potential risk of damage to the heritage item during the construction phase.	
	Significant building fabric and elements of the adjacent heritage item are to be protected during the works from potential damage. Protection systems must ensure historic fabric is not damaged or removed. The installation of new services shall be carried out in such a manner as to minimise damage to or removal of historic fabric and shall not obscure historic features.	Accepted
	The Applicant must ensure that if substantial intact archaeological deposits and/or State significant relics are discovered, work must cease in the affected area(s) and the Heritage Council of NSW must be notified. Additional assessment and approval may be required prior to works continuing in the affected area(s) based on the nature of the discovery.	Accepted
TfNSW	A Green Travel Plan be developed and made available to all staff and visitors.	Noted and agreed.
	TfNSW also requests DP&E apply the following condition for the development of a Construction Traffic Management Plan:	Accepted
	Prior to the commencement of any works on the Site, a Construction Traffic Management Plan prepared by a suitably qualified person shall be submitted to the Principal Certifying Authority (PCA). The Plan must be prepared in consultation	

Agency/Private	Submission/Comments	Proponent's Response
	with TfNSW, and Roads and Maritime Services. The Plan shall address, but not be limited to, the following matters: a) details of demolition and construction activities and timing of these activities; b) ingress and egress of vehicles to the Site; c) loading and unloading, including construction zones; d) the staging of works; e) predicted construction traffic movements, types and routes, and f) pedestrian and traffic management methods.	
	The Applicant shall submit a copy of the final Plan to Kogarah Council for endorsement, prior to the commencement of work.	
RMS	RMS would prefer a Masterplan be developed for the site.	Noted
	It is noted that the intersection of Kensington Street and Montgomery Street will operate at LoS F with a considerable increase in delays on the western approach resulting in vehicles queuing back to the roundabout intersection of Kensington Street and Gray Street to the west during the AM peak hour as a result of the ASB development	Noted.
	Roads and Maritime would support the proposed 30m extension of the existing "No Stopping" parking restriction on the northern side of Kensington Street as an alleviation measure, subject to Council's approval as Kensington Street is a local street under the care and control of Council.	Agreed
	The appropriate community consultation should be undertaken with regard to the proposed parking restrictions.	

Agency/Private	Submission/Comments	Proponent's Response
	2. The layout of the proposed car parking areas associated with the subject development (including driveways, grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) should be in accordance with AS 2890.1-2004 and AS 2890.2-2002 for heavy rigid vehicle usage.	Agreed
	3. A Road Occupancy Licence should be obtained from Transport Management Centre for any works that may impact on traffic flows on Princes Highway during construction activities.	Noted
	4. A Construction Traffic Management Plan detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to Council for determination prior to the issue of a construction certificate.	Agreed
	All works/regulatory signposting associated with the proposed development are to be at no cost to Roads and Maritime.	Agreed
Public Submission 1	For the planned additional levels of the Gray Street car park, will you please consider a lighting design that only illuminates the car park and minimises light spilling into the surrounding neighbourhood? Lighting for the existing levels of the Gray Street car park spills out and causes 100-150 metres of the surrounding neighbourhood to be brightly illuminated on a permanent basis. As a residential neighbour of the hospital, I find this to be unpleasant.	Noted. Lighting will be designed for the proposed car park expansion works to reduce additional light spill and comply with AS4282: 1997 Control of the Obtrusive Effects of Outdoor Lighting.

Agency/Private	Submission/Comments	Proponent's Response
	If the existing lighting design was replicated on the additional,	
	higher levels, of the car park it may be more intrusive.	
Public	Support the planned relocation of the helipad to a more	Noted.
Submission 1A	elevated position, thus being further from local residences	
Public	I have no concerns with the actual development of the St	
Submission 2	George Public Hospital (SGPH) Stage 2.	
	 There is one issue I have with the following. Building Heights Amendments The closing date of the KCC Draft LEP NCP was on Friday 29th May 2015. Interestingly enough, there was a height restriction of 15 metres of buildings in the surrounding area, namely Gray Streets, Short, Chapel and Gray Streets. There were some exceptions, these were Gray Street, near Railway Streets - 39 metres and 21 metres and 143-155 Princes Highway & 38-48 Chapel Street Kogarah 36 metres. 	The issue of building heights in the surrounding suburbs is a matter for Council and not a planning issue for consideration with this application.
	It was my understanding that the reason for the height restriction of 15 metres (Letter O) for Short Street Kogarah, and the surrounding areas was due to the fact that the current location of the helipad, located on top of the current STPH carpark. The SGPH carpark helipad is 45 metres height.	
	Interestingly enough, and NO DOUBT by co incidence, I receive 2 letters, see point 2 after the closing date of the Draft LEP NCP being the 29 th May 2015.	
	Now with the SGPH stage 2, the helipad is to be re located near the corner of Gray Street and Queens Ave at a height of 60 or so metres high.	

Agency/Private	Submission/Comments	Proponent's Response
	If this is correct then a re evaluation of the building heights at Short, Chapel and Gray Streets be increased from 15 to 39 metres. I do have concerns with the overall development being	
	carried out in the Kogarah Municipality. There need to be more public meetings /consultations at both the local and state government levels where there is a win/win outcome to all the residences not the selected few.	
Public Submission 3	 This submission raises similar issues to Public Submission #2. These are addressed above. Additional issues raised are outlined below: No concerns with the proposed development of the St George Public Hospital (SGPH) Stage 2. However, there are a number of concerns with how this information has been delivered to the residents within the Kogarah Municipality: 	Noted
	Information received on the project was contradictory	The information mentioned in the submission refers to earlier versions of the design that were not finalised until such time as the application was lodged. Earlier versions were provided to the community for information purposes only. The correct information is that contained in the application as exhibited.
	Kogarah City Council (KCC) Draft Local Environment Plan (LEP) – New City Plan (NCP) has no information pertaining to the different stages that are to occur at the St George Public Hospital (SGPH).	The Kogarah LEP and City Plan are Council documents and do not relate to the St George Hospital site, other than in the context of zoning. No other specific controls apply to the site.
	No Transport Management and Accessibility Plan (TMAP),	There was no requirement for a TMAP as part of this application.

Agency/Private	Submission/Comments	Proponent's Response
	Responses from the Draft LEP - NCP	As mentioned above there are no controls within the Draft LEP that apply to the St George Hospital Site.
	SGPH Stage 2 construction hours of operation	The hours of construction have been applied for to enable the construction to be undertaken in a timely manner. All works will be undertaken in accordance with the Interim Construction Noise Guideline (ICNG) (2009), and Assessing Vibration: a technical guideline (2006).
		 Heavy machinery will not be brought to site between 10pm and 5am unless the circumstances in the ICNG are met - ie the delivery of oversized plant or structures that police or other authorities determine require special arrangements to transport along public roads emergency work to avoid the loss of life or damage to property, or to prevent environmental harm maintenance and repair of public infrastructure where disruption to essential services and/or considerations of worker safety do not allow work within standard hours public infrastructure works that shorten the length of the project and are supported by the affected community works where a proponent demonstrates and justifies a need to operate outside the recommended standard hours.
	SGPH Stage 2 Helicopter Health and Safety of Helicopter Flights	The use of the existing helipad during the construction period for the Acute Building cannot be stopped. As a major trauma facility, it is critical that the HLS remain operational at all times.
	SGPH Car Parking	HI is constructing approximately 200 additional parking spaces on site, both on Kensington St (works already completed) and as an expansion to the Gray St car park, to meet the demands of the ASB.

Agency/Private	Submission/Comments	Proponent's Response
	Financial Compensation	The issue of compensation is not a town planning consideration. The construction of the ASB will be undertaken in accordance with a Construction Management Plan ensuing that appropriate controls are put in place to avoid inconvenience to the local community.
Public Submission 4	I both support the proposal in concept - I accept the need for the hospital to offer improved health care to the community - but object strongly to the proposed height of the development.	Noted
	 Reasons for Objection The completed height of the development - (varying reports in paperwork sent out by government departments differ between 7or 8 storeys above the 2 storey Emergency Department) - will result in a building 9-10 storeys high, overshadowing the rear of my home which has been in the family since 1901. (114 years of paid rates!) There will be a major loss of sunshine hours to my property - severely affecting the health and beauty of my carefully tended north-facing backyard lawn and garden. 	A thorough solar analysis has been undertaken which identifies which properties are impacted. While some of the properties lose some sunlight to habitable rooms in midwinter as a result of the proposed ASB, no property has less than 3 hours of sunlight to areas of private open space. This is defined in the Standard Instrument as an area external to a building (including an area of land, terrace, balcony or deck) that is used for private outdoor purposes ancillary to the use of the building. For the purposes of the solar study it was considered as balconies in residential flat buildings and rear yards in houses, which is consistent with this definition.
	 There will be a drastic curtailment in the time I am currently able to enjoy outdoor living in the sunlit open air across the rear of my home - especially during winter. There will be a huge encroachment on my visual space. The building proposal will result in one long continuous 'wall' for me to look out at from the living area of my home. Although the development is in two different 'steps' with a lower one closer to Gray St and 	A range of development options were considered in developing the design of the Acute Services Building redevelopment project. The environmental impact assessment summarises the outcome of the studies undertaken and the need to be dictated by clinical demand. As outlined in the EIS, the location of the ASB enables colocation of acute services and integrates the key functions of

Agency/Private	Submission/Comments	Proponent's Response
	 a much taller one behind, the result will still be one long sun-blocking structure to the rear of my home. Disappointingly, planners have not thought of developing alternate sections of the hospital zone eg that bordered by Belgrave/South and Chapel Sts which would have no adverse effect on any residential 	theatres, ICU/HDU, acute in-patient beds, emergency department, ambulance and helicopter access (together with their support services) in one contiguous facility. There are no other locations on the highly constrained St
Public Submission 5	properties as there are none adjacent to that area. I refer to the above Project and in particular to the Environmental Impact Statement concerning Transport Assessment on page 41 and to Appendices dealing with 'Existing Car Parking'.	The matters raised in this submission relate to a range of development proposals in the Kogarah LGA. Many of which are not relevant to this application. Those that relate to the proposal are addressed below.
	In October 2012, prior to the construction of the New Emergency Department (primarily a ground level building) on Gray Street, I attended an interview at Parliament House in Macquarie Street to defend the demolition of the historic Griffith House in Gray Street, and to draw attention to the overall lack of parking in and around Kogarah Town Centre, the direct responsibility of Kogarah City Council, in association with the State members for Kogarah and Rockdale and the Federal Member for Barton.	
	In my view and shared by the community who have observed the growth of both St George Public Hospital and the adjacent St George Private Hospital together with the increase of complementary medical services, and the expansion by 2,500 personnel of the head office of St George Bank, there has been a total lack of foresight in dealing with parking and traffic flow in and around Kogarah, Rockdale, Carlton, and Hurstville. Add to these, the construction of high rise commercial units and residential apartments and the planned Gateway entrance to Kogarah at President Avenue.	Both the Emergency Department and this proposal provide sufficient parking to meet the needs of staff, patients and visitors to the facility. In addition the site is located in close proximity to a railway station and local bus routes.

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	The net result from the construction of the New Emergency Department was a gain of just six (6) car spaces. There was no excavation under the site or under Gray Street. Opportunities lost!!	Below ground parking is not feasible for the hospital development and as mentioned above there is sufficient parking supplied for this project.
	The construction of the New Emergency Department went ahead despite the NSW Government Health Infrastructure displaying plans for the additional seven (7) or eight (8) levels, without any provision for additional parking or traffic considerations at the intersection of Gray Street and the Princes Highway.	Approximately 200 additional on-site parking spaces are to be provided on the St George Hospital campus. This level of supply is commensurate with the anticipated level of peak demand generated by the proposal.
	Of recent dates we have a) a new Ambulance Superstation by NSW Health being constructed at 1-9 Rocky Point Road, Kogarah without any provision for basement car parking, even though there is an opportunity for a joint venture with a parking provider (for example, Wilson Parking) or in conjunction with Kogarah Council (as achieved at Kogarah Town Square). The site at Rocky Point Road is on the fringe of the Kogarah Town Centre, close to both hospitals and could have been developed with allowances for future basement parking, and upper level office or staff residential apartments. b) a just completed ground level car park at the site of	NSW Ambulance developments are not relevant to this application. As mentioned above the current application provides adequate
	the previous Emergency Department on Kensington Street has provision for 55 spaces. It appears no consideration was given for any basement level's and my guess is that parking will be dominated for staff use, thereby diminishing any indication that it will provide relief to additional parking needs linked to Project SSD 7024. c) new dedicated car park for 288 car spaces by St George Private Hospital at 6-12 Hogben Street,	The development of the St George Private Hospital is not under the jurisdiction of NSW Health and the decisions of Council on

Agency/Private	Submission/Comments	Proponent's Response
	Kogarah, which I understand comes within the jurisdiction of NSW Health, yet Kogarah Council approved a 6 level building without any basement car parking, representing a loss of 60 to 180 car spaces depending on the number of basement levels. How this lack of foresight evolved is beyond me, and in addition Council rejected any suggestion of providing accommodation units at the rear of the car park which is directly opposite the entry to St George Private Hospital. I also understand that despite Councillors stating that drivers will be relieved to find car parking in Kogarah's town centre, it omits to say that over a short time all available car spaces will revert to the use of medical practitioners and staff at St George Private Hospital staff.	this matter are not considerations for this application.