

Re President Private Hospital development

OBJECTION

I object to the proposal on the following grounds.

1. Destruction of Hotham House, which is a local heritage link to the Shire's early poultry industries, and a pleasing contribution to the local streetscape.
2. Visual amenity and privacy impacts from the gross height and bulk combined with small setback from the street, which is totally out of character with the adjoining residential area, with visual and amenity impacts, and would set a precedent for any other similarly unsuitable project being approved in a R2 residential area of the Shire.
3. Increased noise from the huge air-conditioning complex on the roof, with particular impact at night, and from reflection of traffic noise from the full frontage two and three storey building .
4. Increased danger to pedestrians and other motorists in Hotham Road, a small local street, that will occur from vehicles tuning into and exiting from the hospital, and from extra traffic on side streets from people forced into overflow parking because of under-provision of on-site parking.

I support my objections as follows.

PROPOSED DESTRUCTION OF HOTHAM HOUSE

SEARs Requirements for Heritage Assessment

7. Heritage

- Provide a statement of significance and an assessment of the impact on the heritage significance of any heritage items, including draft heritage items, on the site in accordance with the guidelines in the NSW Heritage Manual.
- Address any archaeological potential and significance on the site and the impacts the development may have on this significance.

Much of the content of my submission to this item had been based on refuting GBA Heritage's opposition to against the inclusion of listing as a local heritage item. I had compiled this before I became aware only late this afternoon that Hotham House has been so listed, as per Amendment 18 of the Sutherland Local Environmental Plan in April 2020.

GyMEA "Hotham House"— house and garden 65 Hotham Road Lot 24A, DP 26995 Local 1510

GBA Heritage's justification and recommendation for demolition of Hotham House that had been based on its assumed exclusion from Heritage listing, has been nullified, and therefore is obsolete.

VISUAL IMPACT

SEARS states (*with my highlighting*)

3. Built Form and Urban Design

Address the height, density, bulk and scale, setbacks and interface of the proposal in relation to the surrounding development, topography, streetscape and any public open spaces.

4. Environmental Amenity

□ Assess amenity impacts on the surrounding locality, including solar access, visual privacy, visual amenity, overshadowing and acoustic impacts. A high level of environmental amenity for the surrounding residential land uses must be demonstrated.

The highlighted sections have been omitted in the Main Report wrongly showing reduced parameters:

Page 20:

4. Environmental Amenity <ul style="list-style-type: none">• Detail amenity impacts including solar access, visual privacy, view loss, overshadowing and wind impacts.	Section 8.2.4 Refer to Urban Design Report (Appendix 4)
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Section 8.2.4 on page

SEAR 4 requires the following:

- Detail amenity impacts including solar access, visual privacy, view loss, overshadowing and wind impacts.

Main Report Page 14

Environmental and Residential Amenity Impacts

Impacts such as views, light spillage, noise and public safety have been discussed in the Urban Design Report (**Appendix 4**) The Urban Design Report (Appendix 4) referred to refers to “internal amenity” of the hospital six times but completely omits any consideration of “assessvisual amenity”” A high level of environmental amenity for the surrounding residential land uses must be demonstrated”

There are headings and a statement in the Main Report mentioning visual amenity but no evidence of analysis or discussion regarding visual amenity or of having demonstrated that a high level of environmental amenity for the surrounding residential land uses. These are the actual SEARs requirements, as opposed the proponent’s cut-down version quoted in the Main Report, that omits these key Environmental Assessment parameters.

Meaningful analysis has been replaced by, for example in the Urban Design Report, such as:

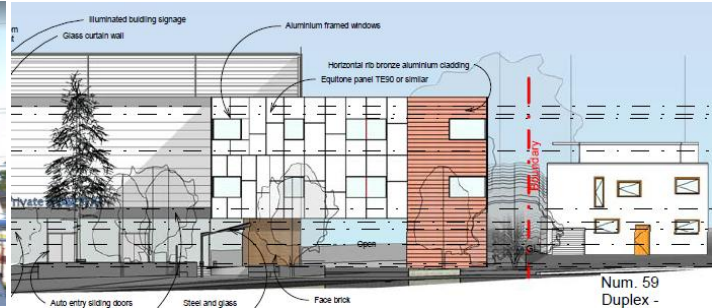
The manipulation of bulk and scale to achieve subconscious readability of the development. By playing with bulk and scale, the visitor achieves a general understanding of where to go upon arrival at the site. The height rises to three storeys at this location (corner of Hotham Road and President Avenue), reinforcing the arrival at a road intersection and becoming a landmark along President Avenue.

that attempts to justify the gross scale but skim over the reality of the severe impact of the development, in defiance of the applicable standards for the adjoining R2 and R3 height of building limits of 8.5 and 9 m respectively.

Hotham Road approximate visual comparison
Existing



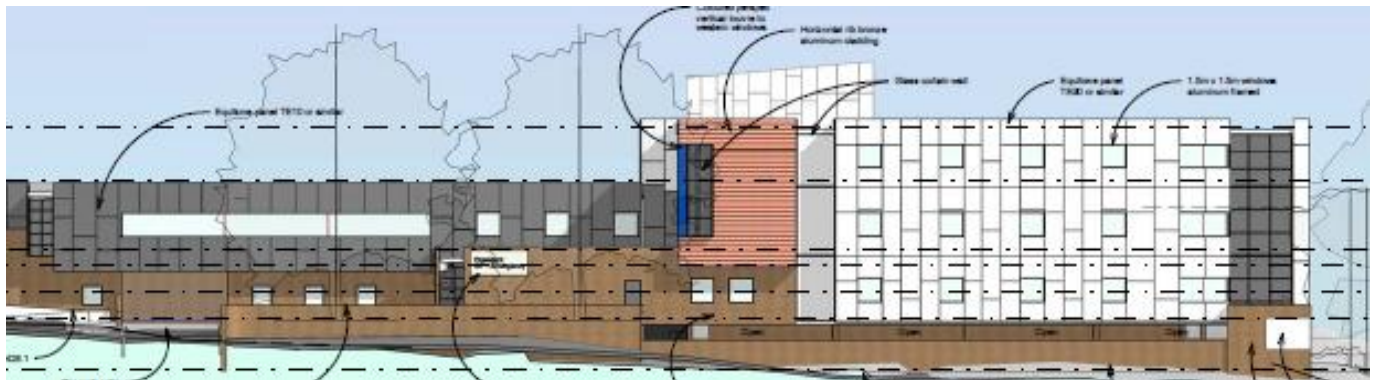
Proposed



President Avenue approximate visual comparison
Existing



Proposed



Page 82 of the Main report quotes with respect to patient welfare:

“Access to views and open space improve healing times and so are essential to a health facility.”

The above pictorial comparisons for Hotham Road and President Ave demonstrate that this welfare consideration will be denied to residents who live opposite the facility and will lose their open outlook to green space from lawns and gardens in the set-backs from the street, and no longer be able to appreciate a horizon where trees transition to the view of open sky.

The Urban Design Report commences with

Historically the development of hospitals has been haphazard and on an as needed basis. As a result, many hospitals have developed with a height, density and bulk unsatisfactory to the surrounding urban fabric. The proposal aims to manage height, scale and bulk to ensure that the development relates to its surrounding context.

My demonstrations of the severe adverse impact, indicate that the proposed new Hospital is actually one of those haphazard developments, with cramming a hospital too big for the site, so that setbacks from the street and adjoining properties are too small in the context of the neighbourhood.

This is not an “upgrade” in the true sense of the word, but principally a brand new hospital four times the size of the present one, the proponent perhaps exploiting the retention of the operating theatre and hydrotherapy pool as the basis for calling it an upgrade.

NOISE

Planning Secretary's Environmental Assessment Requirements

9. Noise and Vibration

... Outline measures to minimise and mitigate the potential noise impacts of the development on surrounding occupiers of land. ...

4. Environmental Amenity

Assess amenity impacts on the surrounding locality, including solar access, visual privacy, visual amenity, overshadowing and **acoustic impacts**. A high level of environmental amenity for the surrounding residential land uses must be demonstrated.

The Consultant has made an arbitrary choice as to the relevant standard:

Although there is no specific policy relating to vehicle noise intrusion for affected residents, we have also adopted the requirements of the NPI for this type of noise.

Satisfying SEARS 4 would require the more stringent Protection of the Environment Operations (Noise Control) Regulation 2017, where:

A person is guilty of an offence if—

- (a) the person causes or permits an air conditioner to be used on residential premises in such a manner that it emits noise that can be heard within any room in any other residential premises (that is not a garage, storage area, bathroom, laundry, toilet or pantry) whether or not any door or window to that room is open—
 - (i) before 8 am or after 10 pm on any Saturday, Sunday or public holiday, or
 - (ii) before 7 am or after 10 pm on any other day,

Modelling has been applied to assessing the future impact on locations that correspond to the noise monitors rather than as would be encountered by nearby residents. This limited methodology will underestimate the noise impact on residents opposite the development, particularly on Hotham Road residents directly opposite the large roof air conditioning system, because they are directly exposed to this noise source, worse for an upper level of a two-storey dwelling, particularly with potential for more sleep disturbance at night.

The noise analysis report emits any consideration of the increase of noise by reflection of traffic noise by the new building facades particularly on President Avenue, particularly with potential for more sleep disturbance at night.

The noise analysis report emits any consideration of thermal inversions that will worsen air conditioning noise and traffic noise, particularly with potential for more sleep disturbance at night.

TRAFFIC AND PARKING IMPACT

The traffic and parking impact assessment report states for the proposed hospital expansion:

The ground floor parking area can be accessed and addressed from President Avenue and Hotham Road, this will allow for better circulation to find a vacant car space and reduce the need to enter and leave the adjacent public road.

An enter only driveway is also proposed on Hotham Road for patient drop off exit is via the two-way driveway running of Hotham Road to the north.

The proposed building offers no possibility of these measures.

The traffic report apparently is based on the main entry/exit point and President Ave and is therefore rendered obsolete, with the traffic impact on Hotham Road, which is a minor local road, underestimated, and the need for extra turning lanes opposite the entry exit points not yet considered

The traffic impact north of the site on Hotham Road and Clement Pde over the railway line would need to be considered, particularly if all access is to be via Hotham Road, this route encounters fewer traffic lights for sources/destinations eastward along the Kingsway and northward along the Princes Highway.

The parking space calculation appears to be for Private Hospital in-patients only with no regard for the Wellness Centre, X-ray faculties etc. The claim to reduce by 5 spaces would further result in the need for overflow parking, causing inconvenience to neighbours, patients, and visitors to patients or home. (It is not clear if the parking provision allows for visitors.

The Architectural Drawings Part B show more clearly the main entry/exit point and President Ave, thus indicating that there has been a failure to coordinate the Consultants' reports with the Main Report.