



File Ref: DN20/0063

November 2022

Department of Planning Industry & Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Attn: Director Social and Infrastructure Assessment

Dear Sir/Madam

Development Referral No. DN20/0063

Proposal: Environmental Impact Statement (EIS) for alterations and additions to President Private Hospital (SSD-10320).

Property: 369-381 President Avenue, Kirrawee

I refer to the IPC meeting on the state significant development application for alterations and additions to President Private Hospital.

Further to Council's previous letters (dated 29 January and 1 June 2022) and the IPC meeting on 30 November, the following additional comments are provided for consideration.

Council is supportive of a hospital on this site and of the redevelopment and improvement of the current facility. However, the site presents some significant challenges and Council continues to have several serious concerns with the application as currently proposed, which are detailed below.

Urban Design:

The building design is defensive to the street and is not consistent or complimentary to the local character with a poor relationship to neighbours.

Of most concern is the height of the north wing fronting Hotham Road and to the rear of the existing dual occupancy. This height is excessive in relation to these residential dwellings, particularly 59 Hotham Road which sits much lower than its neighbour at 2A Bidurgal Ave.

Any additional height should be accommodated in the southern portion of the site, where the site drops to President Avenue. There is significant local traffic along President Ave and height impacts can be better ameliorated. The West Wing is only two storey and could potentially accommodate an extra level accessed from the East Wing as per the first floor plan. This area is set back from the residential properties to the north as well as to President Ave.

The removal of height from the eastern section of the North Wing would provide a more appropriate relationship to the low density development to the north.

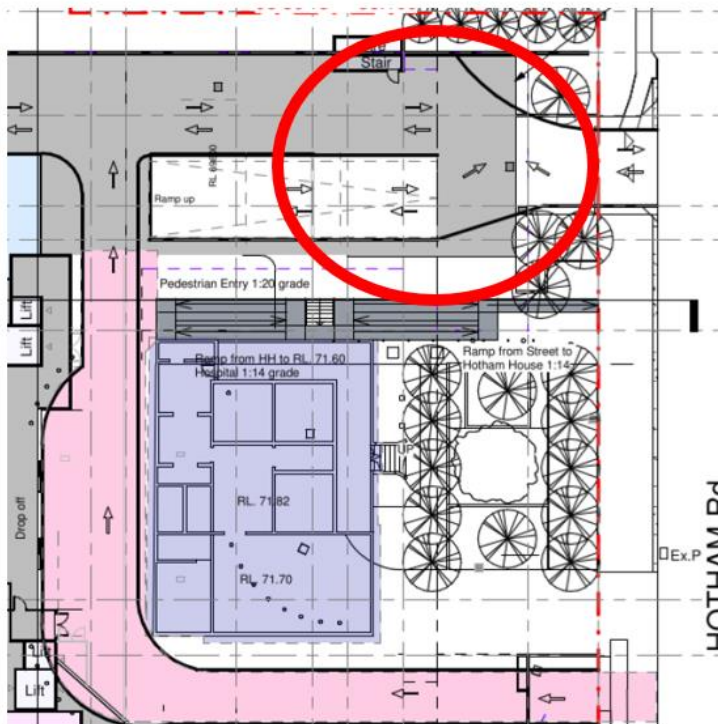
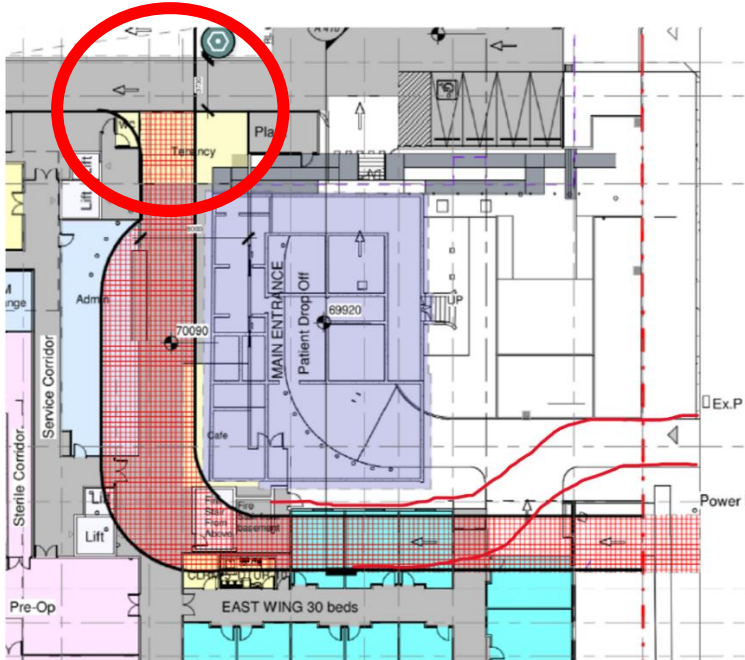
Heritage:

Council remains unsupportive of the demolishing of Hotham House.

Vehicle access:

- Hotham House can be retained with regards to the access points off Hotham Road either utilising the proposed access or as proposed in the Design Options.

- Notwithstanding, it is acknowledged that the internal changes required to support this arrangement would create some challenges with respect to conflicts between service vehicles, port cochere traffic and general traffic entering, and exiting the site at the proposed northern ingress and egress in Hotham Road (as circled in red).
- Both designs as shown in the Retention Report are unsatisfactory and would require a redesign to the northern car park and basement ramp.



Pedestrian access:

- As indicated by the options plan above, a primary pedestrian accessway from the Road to the main entrance / drop of zone (which would now be to the rear of Hotham House) is achievable with a maximum grade of 1:20.
- From the drop off zone to Hotham House requires a single 1:14 ramp.
- In the option plan, the double switchback from Hotham House to the Road could be deleted.
- Signage and other features could clearly provide appropriate way finding to this entrance from the street.

Vehicle access to the site

- Council does not support **sole** ingress and egress from Hotham Rd.
- In this regard, Council supports the sharing of ingress and egress to both President Avenue (left in left out only) and Hotham Road to optimise accessibility to and from the site and to reduce the impact on the efficiency of the traffic signals at the intersection President Avenue and Hotham Road.
- Council's support for this option is **only** on the provision of a 45m deceleration lane in President Avenue on approach to the driveway entry. Council's safety concerns relate to:
 - A significant increase in the number of turning movements into the site from President Avenue.
 - President Avenue being the primary road frontage and a classified road.
 - Location of the proposed entry on a higher speed, downhill gradient approach in close proximity to the signalised intersection of Hotham Road (potential for rear end crashes).
- Furthermore, Council does not support the currently proposed angular driveway entry (President Ave) as it does not address these safety concerns and will create another safety issue by encourage vehicles to cross the pedestrian footpath and enter the property at an unsafe speed.

It is noted that Council's position is independently supported by DoPE's own peer review of the traffic impact assessment.

As part of the original DA (DA02/1859) and subsequent DA (DA09/0929), a slip lane was considered necessary at the President Ave entry to the car park and a separate exit was proposed east of the car park. However, without a slip lane, an informal car park (without consent) has been operating since 2009 at this location.

Construction Noise:

The conditions provided require a Construction Noise and Vibration Management Plan, refers to the Interim Construction Noise Guideline (DECC, 2009) and limit the hours when activities such as rock breaking, rock hammering and sheet piling can occur.

Further discussion with Council's Environmental Health unit have indicated that conditions regarding to construction noise are acceptable and no further or modified conditions are necessary.

Flooding

Council Stormwater Engineer has undertaken a detail assessment of submitted "Preliminary Flood Assessment No. P1907286JR02V03 (February 2022) by Martens", GRC Hydro to DPIE (19 September 2022), Flood response to GRC Hydro Comments by Martens (29 June 2022) and Flood response for additional information by Martens (18 July 2022).

The proposal cannot be supported on grounds of flooding for the following reasons:

- The PMF flow behaviour north of the western side of the building is poorly modelled/defined. Impacts upon the built form (building floor levels, basement entries,

paths, and driveway) are not known and it is therefore difficult to assess flood risk and compliance with required controls.

- There is an existing stormwater overflow path traversing the property, forward of the existing building, generally from the northern end of Bidurgal Lane to President Avenue. It is acknowledged that the existing overland flow presents a level of risk (hazard / depth / flow / velocity). The proposed swale channels the flow in a manner that results in better land use but increases the risk to unacceptable levels, in particular, the submitted Flood Hazard Map for 1%AEP details higher hydraulic hazard within the property and crossing from the property to the carriageway of President Ave.
- In principle, constructing a swale and, perhaps, augmenting the pipe system / inlet capacity system, is supportable but modelling must assure no change or less risk.
- From the modelling / report, the following comments are made to hopefully assist with moving forward.
 - The proposed courtyard forward of the hydrotherapy building, south carpark, and driveway, concentrate the overland flow. The removal and or reduction of these structures would assist with widening the swale / flow.
 - The driveway linking President Avenue to the southern carpark is not clearly defined, for example, does it convey flow underneath a raised driveway (potential for blockage), or provide a driveway on grade with flow over (causeway).
 - Additional information needs to be provided to show the interface of the swale to President Avenue as the plans lack detail. There is an inconsistency with regard modelled flow and the southern bank of the of the swale.
 - It is noted that a slip-lane to the driveway off President Ave is required by Council and TTPP (applicant consultant traffic expert), which will impact on flood behaviour at this area and will require significant design changes.
 - No low-flow inlet structures are evident to convey minor flow to the existing pipeline. Constructing additional and or improved inlet structures may reduce the frequency to which overland flow is conveyed.
 - Installation of larger pipes may also assist with reducing overland flow.
- Council's Easement Policy only allows construction of demountable carports and pavements over a drainage easement. Therefore, all other structures, such as foundations, retaining walls, stairs, and basement are not covered by this Policy.
- Submitted architectural design drawing (version 60 Sheet A031 by Imagescape) indicates a realignment of Council's drainage easement. The Applicant has not obtained "in principle" support to amend the alignment of Council's stormwater drainage easement.

If you need any clarification of the above comments, please contact myself or Council's Team Leader, Development Assessment, Annette Birchall, or email abirchall@ssc.nsw.gov.au and quote the application number in the subject.

Yours faithfully



Beth Morris
Manager Major Development Assessment
Shire Planning