

11 January 2023
Your Ref: DA22/11444

The Director Regional Assessments
NSW Department of Planning and Environment
Locked Bag 5022
Parramatta
NSW 2124

Att: Clay Logan

Dear Sir,

**RE: 60-64 SHOWGROUND ROAD GOSFORD – PROPOSED
INTEGRATED HEALTH HUB FACILITY AND DISABILITY
ACCOMMODATION – ADDITIONAL INFORMATION**

We refer to the Department's letter of 6 December 2022 requesting further information. Cornerstone Healthcare Properties have engaged Metroplan Services to respond to the matters raised. For ease of reference, the matters are addressed below in the same order as set out in your letter.

1. State Environmental Planning Policy (Housing) 2021

A statement demonstrating compliance with the development standards, site requirements, and design principles set out in Part 5, Divisions 3-6 of the Housing SEPP is provided at **Attachment A**.

A review of the Seniors Living Policy: Urban Design Guidelines for Infill Development published in March 2004 is provided in accordance with section 97 of the Housing SEPP at **Attachment A**.

A fire sprinkler plan prepared in accordance with section 91 of the Housing SEPP is provided at **Attachment B**.

2. Architectural Design and Residential Amenity

A design verification statement is provided in accordance with Section 29 of the Environmental Planning Assessment Regulation 2021 at **Attachment C**.

A revised Design Excellence Statement that demonstrates how the proposal responds to advice received from the City of Gosford Design Advisory Panel, the Gosford Urban Design Framework, the Gosford DCP 2018, and Section 5.46 of SEPP (Precincts Regional) 2021 to demonstrate design excellence and justify the proposed height variation is provided at **Attachment C**. At the most recent meeting of 15 December 2022, the Panel raised the following matters:

- *For the building façade to the North-Eastern corner of the proposal provide consideration to the maintenance and cleaning requirements for the aluminium batten screens.*
- *Particular attention needs to be given to the landscaping along the Western and Southern boundaries. Mature landscaping should be delivered to landscape area and deep soil locations.*
- *Investigate options to improve solar access for the specialist disability accommodation units. The areas of private open space should be partly open to natural light. The layout and fenestration of the Northern most apartment should also consider the use of clerestory windows to improve natural light for all the units.*
- *Explore options to provide street trees along Showground Road.*
- *Continue to liaise with the Regional Assessment Team regarding compliance with the Apartment Design Guidelines and building sustainability and environmental performance standards to satisfy the Design Excellence requirements.*

The above matters have been addressed in the amended architectural drawing set at **Attachment E**.

It should be noted that design excellence matters as set out in section 5.45 of (SEPP Precincts Regional) are also considered in the table on page 35 of the SEE submitted with the DA package and in the DRG Response letter at Appendix K of the SEE.

A long street elevation demonstrating the proposal's built-form scale in the context of surrounding development is provided at **Attachment D**.

An ADG assessment demonstrating how the proposal complies with the guideline and justifying non-compliances has been included in the revised Design Excellence Statement at **Attachment C**.

3. Development Controls

A detailed assessment of the proposed development against the Gosford City Centre DCP 2018 development controls is provided under 5.1.2.1 in the SEE. Compliance with the requirements of the DCP is addressed and discussed in the table on pages 44 – 50 of the SEE.

4. Privacy and Overlooking

The submission from Central Coast Local Health District requests that any approval should require screening to protect privacy, including appropriate location of windows and open spaces and the screening of upper floor windows where overlooking these properties.

Drawing A-DA-09.04 Elevations-West has been amended to include additional privacy screens/techniques to reduce overlooking of adjoining properties – refer revised architectural drawing set at **Attachment E**.

It should be noted that the SDA (Level 5) has been designed to consider the visual and acoustic privacy of adjacent neighbours. Open space associated with the SDA is oriented towards the Showground Road (eastern) frontage with balconies and windows on the western façade limited in size to reduce overlooking. Aluminium battens on the western façade on Level 5 (SDA apartments) screen windows and balconies to reduce solar heat gain and provide privacy for residents.

Perimeter landscaping of the roof level open space area will also reduce the opportunity to overlook adjoining neighbours and direct views further afield.

5. Ecologically Sustainable Development

A letter demonstrating that the building meets or exceeds minimum building sustainability and environmental performance standards in accordance with Section 5.46 of SEPP (Precincts Regional) 2021 is included at **Attachment F**.

It should be noted that a NatHERS Energy Rating Certificate was submitted as part of the original DA package (Appendix I of the SEE). In addition, design techniques and materials used to achieve ESD outcomes are also discussed in detail in the table on page 35 of the SEE submitted with the DA. Design techniques include, but are not limited to, vertical fins adjacent to window openings, natural vegetation growing up aluminium battens and slab projections. On the Western façade aluminium battens screen windows and balconies on Level 5 (SDA apartments) to reduce solar heat gain and provide privacy for residents.

6. Gross Floor Area

A revised architectural drawing set including amended Gross Floor Area (GFA) calculations in accordance with the definition within SEPP (Precincts Regional) 2021, and a GFA breakdown schedule are included at **Attachment E**.

The site has a mapped FSR limit of 2:1, but is also subject to the formula set out in Clause 5.46 (2) of the SEPP since the site area is less than 2800m². The FSR formula is:

“2 + (X × 0.02):1, where X is the percentage of the gross floor area (GFA) of the building that is used for a purpose other than residential purposes. “

The development has a proposed total GFA of 8209.4m² including a residential GFA of 651.3m². Using the above formula, the percentage of residential floor space is 651/8209 = 8%

Therefore X (% of GFA other than residential is approximately 7558m² or 92%).

Using the formula, the maximum permitted FSR is 3.84:1

The proposed FSR is 3.37:1 (2437m² site size) which complies.

7. Building Operation

The proposed operating hours for the building are currently set to be between 7:00am and 19:00pm. The operating hours of the building may change from time to time depending on the demands and needs of the community and tenants.

The building will be secured by CCTV monitoring and secure access. Secure access will only be allowed by swipe card holders outside of these hours. An Operational Management Plan is included at **Attachment I**.

8. Traffic and Parking

The proposed development makes provision for a total of 225 basement parking spaces plus 3 motorcycle bays and associated service areas, including ambulance bay and refuse bay, to be accessed off Showground Road. The breakdown of parking spaces is as per below:

- Basement 4 – 35 car spaces, storage, plant and circulation areas;
- Basement 3 – 70 car spaces (including 2 accessible), storage, plant and circulation areas and 1 motorcycle bay;
- Basement 2 – 70 car spaces (including 2 accessible), storage, plant and circulation areas and 1 motorcycle bay;
- Basement 1 – 50 car spaces (including 2 accessible and 2 van spaces), 1 SDA drop off space and 1 motorcycle bay.

An updated Traffic Impact Assessment addressing the matters raised in your letter is included at **Attachment G**.

The revised architectural drawing set at **Attachment E** includes clearly designated visitor drop off locations as well as designated parking spaces for each use. Resident parking is proposed at Basement Level 4.

9. Acoustic Impacts

An updated Acoustic report addressing the matters raised in your letter is included at **Attachment H**. The updated Acoustic report includes a construction noise and vibration assessment as well as mitigation measures such as a construction noise and vibration monitoring plan which will include verification noise measurements at the beginning of a new stage of works.

The proposed SDA apartments are approximately 250m from Gosford hospital rooftop helipad, however it is unknown how often this is used or the details of the approach and take - off route. The acoustic report provides façade design advice based on the helicopter coming within 100m of the SDA apartments, with potential sleep disturbance impacts becoming the limiting design criteria.

10. Access

The revised architectural drawing set at **Attachment E** includes car parking requirements for disabled persons which comply with the relevant Australian Standard (AS 1428 Pt 1 and 2, or as amended) and the Disability Discrimination Act 1992 (as amended). Compliance could also be ensured by way of an appropriate condition of consent.

The proposal is well resolved and represents a considered response to the opportunities and constraints presented by the site, its context and setting. The proposal achieves design

excellence and places a high-quality health care facility, including disability housing, into a location which will reinforce the existing established health care precinct in Gosford.

We trust that the additional information provided will now enable the Department to make a positive determination. Should you require any further information, please do not hesitate to contact the undersigned.

Yours sincerely



Andrew Biller
DIRECTOR METROPLAN SERVICES

Attachments

Attachment A – SEPP (Housing) 2021 Compliance Table

Attachment B – Fire Sprinkler Plan

Attachment C – Revised Design Excellence Statement including design verification statement

Attachment D – Long Street Elevation

Attachment E – Revised Architectural Drawing set including amended GFA calculations

Attachment F – ESD Letter

Attachment G - Updated Traffic Impact Assessment

Attachment H – Updated Acoustic Report

Attachment I – Operational Management Plan

Attachment A – SEPP (Housing) 2021 Compliance Table

Attachment B – Fire Sprinkler Plan

**Attachment C – Revised Design Excellence Statement including
design verification statement**

Attachment D – Long Street Elevation

Attachment E – Revised Architectural Drawing set including amended GFA calculations

Attachment F – ESD Letter

Attachment G – Updated Traffic Impact Assessment

Attachment H – Updated Acoustic Report

Attachment I – Operational Management Plan