

15 May 2023  
Your Ref: DA22/11444

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

Att: Keiran Thomas

Dear Sir,

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

We refer to the Department's recent request for further information including compliance with the relevant clauses of Division 7 Non-discretionary Development Standards in Part 5 of State Environmental Planning Policy (Housing) 2021. Cornerstone Healthcare Properties have engaged Metroplan Services to respond to the matters raised.

**1. State Environmental Planning Policy (Housing) 2021**

The proposed development includes 7 specialist disability accommodation (SDA) units at roof top level. Division 7 of Part 5 of State Environmental Planning Policy (Housing) 2021 sets out non-discretionary development standards for independent living units. Clause 108 (1) is set out as follows:

- (1) *The object of this section is to identify development standards for particular matters relating to development for the purposes of independent living units that, if complied with, prevent the consent authority from requiring more onerous standards for the matters*

A table assessing compliance with the development standards set out in Section 108 (2) of SEPP (Housing) 2021 is provided at **Attachment A**. The development does not comply with the deep soil landscaping development standard – Clause 108(2)(e). A statement pursuant to Clause 5.28 Exceptions to Development Standards under State Environmental Planning Policy (Precincts Regional) 2021 is provided at **Attachment B** justifying the non-compliance with the deep soil landscaping development standard.

**2. On-Site Overnight Assistance Unit**

The OOA is an On-Site Overnight Assistance Unit that has been provided as an additional support to the Specialist Disability Accommodation to provide flexibility if additional assistance is required by one of the occupants of the SDA. The OOA is provided to assist and support the

independent living with no set requirement for a bed to be provisioned. As a carer is not occupying the space full-time, the intention is for the carer to not use the space for the primary purpose of sleeping.

### **3. Architectural Design**

Amended Architectural drawings are included at **Attachment C**.

Drawing A-DA-03.01 Floor Plan - Basement 4 shows resident parking to comply with Clause 5 Private Car Accommodation in Part 1 of Schedule 4 of SEPP (Housing) 2021.

Drawing A-DA-03.05 Floor Plan - Ground Floor shows SDA lift to comply with Clause 18 Lifts in multi storey buildings in Part 2 of Schedule 4 of SEPP (Housing) 2021. 7 letterboxes are also provided for SDA apartments as per Clause 4 Letterboxes in Part 1 of Schedule 4 of SEPP (Housing) 2021.

Drawing A-DA-03.10 Floor Plan - Fifth Floor shows proposed bedrooms, bathrooms and toilets in all SDA apartments to comply with Clauses 8-10 in Part 1 of Schedule 4 of SDEPP (Housing) 2021.

Drawing A-DA-09.02 Elevations East shows 7 letterboxes provided for SDA apartments as per Clause 4 Letterboxes in Part 1 of Schedule 4 of SEPP (Housing) 2021.

In relation to basement parking and circulation, the current plans for the basement parking, circulation and ramps comply with the National Construction Code (NCC) and minimum Australian Standards. The limitation on the ramp to 1:8 grade is not desirable and a poor design outcome for the project and the end user. It would result in less accessibility and decreases pedestrian safety by the flow on impact of additional grade and ramp in other areas of the basement which are currently designed with minimal to no grade. The grades greater than 1:8 are only limited to short sections of ramps between levels with no parking on these ramps, they all comply with minimum Australian Standards and any NCC requirements.

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**

**Attachment A – SEPP (Housing) 2021 Compliance Table – Clause 108(2)**

**Attachment B – Statement pursuant to Clause 5.28 Exceptions to Development Standards under State Environmental Planning Policy (Precincts Regional) 2021**

**Attachment C – Amended Architectural Drawings**