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21 June 2024
OUR REF: 2004
Your Ref: DA22/11444

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

Att: Michael Doyle

Dear Sir,

**RE: DA 22/11144 - 60-64 SHOWGROUND ROAD GOSFORD –
PROPOSED INTEGRATED HEALTH HUB FACILITY AND
DISABILITY ACCOMMODATION – SECTION 4.55 (2)
MODIFICATION APPLICATION**

1. Introduction

Please find enclosed for your consideration and determination, an application made under Section 4.55(2) of the Environmental Planning and Assessment Act 1979, to modify the development consent granted by the Minister to DA 22/11144 on 24 May 2023 for an integrated health hub facility and disability accommodation at the above address.

Metroplan Services has been engaged by the applicant (Cornerstone Healthcare Properties) to prepare the supporting information for the Section 4.55(2) application. The proposed modifications as detailed in this submission will result in substantially the same development as that approved by the consent since the modified building has a reduced height, similar footprint, setbacks and configuration to that which is already approved, and the uses will be the same as previously approved other than the specialist disability accommodation which is now being removed. Further reasons are set out in Section 4 below.

Broadly, the amendments relate to reducing the size of the building, including deleting a level of basement parking and one level of medical tenancies, an additional medical tenancy/treatment centre at Basement Level 3, reconfiguring the ground floor layout and internal service areas, and as a consequence, floor plates above to ensure the efficient future operation of the building and replacing the previously approved Specialist Disability Accommodation (SDA) on the top floor (now fourth floor) with medical suites.

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Cornerstone have had feedback from the market that the co-location of medical suites and SDA may not be ideal and that there is significant demand for medical suites in the locality. Further, the proposed amendments follow a review of building costs.

2. Proposed Modifications

In particular, the following modifications are proposed:

- Amend condition A2 – Terms of consent;
- Amend condition B7 – Car parking and Service Vehicle Layout;
- Delete condition B11 – Building materials;
- Delete condition B13 – BASIX;
- Delete condition B14 – Housing SEPP 2021;
- Delete condition B16 – Amendments to Plans;
- Delete condition B17 – Amendments to Plans;
- Delete condition B 21(b) – Landscaping;
- Delete conditions E26 and E27 – Restriction on Use;
- Delete Condition E32 - BASIX

Other than A2, B7 and B17, the above conditions are proposed to be deleted because the SDA (residential component) is being removed from the approved development. B7 should be amended to reflect the reduced number of car spaces (discussed further under Section 3 below). The proposed amendments to A2 and B7 are set out below. The proposed deletion of B17 is discussed under Section 3 below:

A2 Terms of Consent

It is proposed to amend condition A2 as follows (amendments in **bold**):

Terms of Consent

A2. The development may only be carried out:

(a) in compliance with the conditions of this consent;

(b) in accordance with all written directions of the Planning Secretary;

(c) generally in accordance with the SEE and Response to Submissions;

(d) in accordance with the approved plans in the table below (except where modified by the conditions of this consent):

<i>Survey Plan prepared by Bissett & Wright</i>			
<i>Drawing No.</i>	<i>Revision</i>	<i>Title</i>	<i>Date</i>
<i>1</i>	<i>-</i>	<i>Surface Detail Plan</i>	<i>27/05/2021</i>
<i>Architectural Plans prepared by TVS Architects</i>			
<i>Drawing No.</i>	<i>Revision</i>	<i>Title</i>	<i>Date</i>
<i>6245.A-DA-00.01</i>	<i>L</i>	<i>Cover Sheet</i>	<i>30/05/2024</i>
<i>6245.A-DA-00.02</i>	<i>F</i>	<i>GFA Calculations</i>	<i>01/05/2024</i>

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6245.A-DA-01.01	H	Site Plan	01/05/2024
6245.A-DA-01.02	H	Existing Survey	01/05/2024
6245.A-DA-01.03	E	Demolition Plan	01/05/2024
6245.A-DA-01.04	E	Excavation Plan	01/05/2024
6245.A-DA-03.01	H	Floor Plan – Basement 4	
6245.A-DA-03.02	K	Floor Plan – Basement 3	01/05/2024
6245.A-DA-03.03	L	Floor Plan – Basement 2	10/05/2024
6245.A-DA-03.04	N	Floor Plan – Basement 1	30/05/2024
6245.A-DA-03.05	O	Floor Plan – Ground Floor	30/05/2024
6245.A-DA-03.06	L	Floor Plan – First Floor	30/05/2024
6245.A-DA-03.07	K	Floor Plan – Second Floor	30/05/2024
6245.A-DA-03.08	K	Floor Plan – Third Floor	30/05/2024
6245.A-DA-03.09	K	Floor Plan – Fourth Floor	30/05/2024
6245.A-DA-03.10	F	Floor Plan – Fifth Floor	
6245.A-DA-04.01	J	Roof Plan	01/05/2024
6245.A-DA-09.01	J	Elevations – North	30/05/2024
6245.A-DA-09.02	K	Elevations – East	30/05/2024
6245.A-DA-09.03	J	Elevations – South	30/05/2024
6245.A-DA-09.04	J	Elevations – West	30/05/2024

6245.A-DA-10.01	I	Section A	30/05/2024
6245.A-DA-10.02	I	Section B	30/05/2024
6245.A-DA-10.03	H	Section C	01/05/2024
6245.A-DA-22.01	F	North-Eastern Perspective	30/05/2024
6245.A-DA-22.02	F	Showground Road Perspective	30/05/2024
6245.A-DA-22.03	F	South-Eastern Perspective	30/05/2024
6245.A-DA-22.04	F	Showground Road Context	30/05/2024

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Landscape Drawings by Terras Landscape Architects			
Drawing No.	Revision	Title	Date
L01	M	Ground Floor Layout	30/05/2024
L02	M	Ground Floor Retaining Wall 1	30/05/2024
L03	M	Ground Floor Retaining Wall 2	30/05/2024
L04	M	Ground Floor Retaining Wall 2	30/05/2024
L05	M	First Floor Layout	30/05/2024
L06	M	Creeper Wall	30/05/2024
L07	M	Fourth Floor Layout	30/05/2024
L08	M	Fourth Floor Detail Layout	30/05/2024
L09	M	Precedent Images 1	30/05/2024
L10	M	Precedent Images 2	30/05/2024
L11	M	Planting Palette 1	30/05/2024
L12	M	Planting Palette 1	30/05/2024
L13	M	Soil Depth	30/05/2024
L14	M	Soil Specification	30/05/2024
Fire Services Plan Layout by Premium Fire Services			
Drawing No.	Revision	Title	Date
FS.01	A	Fire Services – Tenancy	19/12/2022
Erosion & Sediment Control Plan by ACOR Consultants (CC) Pty Ltd			
Drawing No.	Revision	Title	Date
E1	B	Erosion & Sediment Control Cover Sheet & Notes	14/06/2022
E2	B	Erosion & Sediment Control Plan	14/06/2022
E2	B	Erosion & Sediment Control Plan	14/06/2022
Stormwater Plan by ACOR Consultants (CC) Pty Ltd			
Drawing No.	Revision	Title	Date
C1	C	Cover Sheet & Notes	05/07/2022
G2	B	Stormwater Management Plan – Basement 4	05/07/2022

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C2	C	Stormwater Management Plan - Basement 3	05/07/2022
C3	C	Stormwater Management Plan - Basement 2	05/07/2022
C4	C	Stormwater Management Plan - Basement 1	05/07/2022
C5	C	Stormwater Management Plan – Ground Floor	05/07/2022
C6	C	Stormwater Management Details Sheet No.1	05/07/2022
C7	C	Stormwater Management Details Sheet No.2	05/07/2022
C8	C	Stormwater Detention Report	05/07/2022
C9	C	Water Quality Report Sheet 1	05/07/2022
C10	C	Water Quality Report Sheet 2	05/07/2022
C11	C	Water Quality Report Sheet 3	05/07/2022
C12	C	Flood Summary	05/07/2022

(f) generally in accordance with the following documents:

(i) Access Report prepared by Lindsay Perry Access, Rev 1, dated 06 July 2022

(ii) Acoustic Assessment prepared by RCA Australia, Rev 3, dated 16 December 2022

(iii) Arborist Impact Assessment prepared by Michael Shaw Consulting Arborist, dated 03 August 2022

~~(iv) BASIX Certification, Certificate No. 1287197M_02, prepared by Chapman Environmental Services Pty Ltd, dated 20 July 2022~~

~~(v) BASIX Requirements Summary – Multi Dwelling, 60-64 Showground Road Gosford, NSW 2250, prepared by Chapman Environmental Services Pty Ltd (undated) (Nathers stamp)~~

(vi) Construction Traffic Management Plan prepared by Northern Transport Planning and Engineering Pty Ltd, dated 30 July 2022

~~(vii) Design Excellence Statement prepared by Elevation Architecture, Rev C, dated 22 December 2022~~

(vii) Design Excellence Statement prepared by TVS Architects, Rev D, dated 21 May 2024

(viii) Electrical Infrastructure Report prepared by JHA Consulting Engineers, Rev A, dated 03 August 2022

(ix) Energy Efficiency Statement prepared by CES Chapman Environmental Services (undated)

~~(x) Geotechnical Investigations Report prepared by D&N Geotechnical Pty Ltd, dated 14 June 2021~~

(x) Geotechnical Investigation prepared by BHM Geotechnical dated May 2024

(xi) Gosford Heath Hub Operational Management Plan prepared by Cornerstone Group (undated)

~~(xii) Nathers Certificate Summary, Certificate No. 0007108300, prepared by Chapman Environmental Services Pty Ltd, dated 09 March 2022 o Nathers Certificate Unit 1, Certificate No. 0007108160-03, prepared by Chapman Environmental Services Pty Ltd, dated 09 March~~

~~o Nathers Certificate Unit 2, Certificate No. 0007108178-03, prepared by Chapman Environmental Services Pty Ltd, dated 09 March~~

~~o Nathers Certificate Unit 3, Certificate No. 0007108186-03, prepared by Chapman Environmental Services Pty Ltd, dated 09 March~~

~~o Nathers Certificate Unit 4, Certificate No. 0007108194-03, prepared by Chapman Environmental Services Pty Ltd, dated 09 March~~

~~o Nathers Certificate Unit 5, Certificate No. 0007108202-01, prepared by Chapman Environmental Services Pty Ltd, dated 09 March~~

~~o Nathers Certificate Unit 6, Certificate No. 0007108210-01, prepared by Chapman Environmental Services Pty Ltd, dated 09 March~~

~~o Nathers Certificate Unit 7, Certificate No. 0007108228-01, prepared by Chapman Environmental Services Pty Ltd, dated 09 March~~

(xiii) Preliminary Site (Contamination) Assessment prepared by RCA Australia, Rev 0, dated 12 August 2022

(xiv) Response to request for further information Letter prepared by Metroplan Services, dated 11 January 2023

(xv) Response to Request for Information letter 'RE: 60-64 Showground Road Gosford – Proposed Integrated Health Hub Facility And Disability Accommodation – Additional Information' prepared by Metroplan Services dated 15 May 2023, including

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

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- o Attachment B – Statement pursuant to Clause 5.28 Exceptions to Development Standards under State Environmental Planning Policy (Precincts Regional) 2021*
- o Attachment C – Amended Architectural Drawings revisions I, K, J and F prepared by Elevation Architecture dated 10 May 2015*

(xvi) Statement of Environmental Effects prepared by Metroplan Services, Rev C, dated 12 August 2022 as amended by Section 4.55(2) Modification letter prepared by Metroplan Services dated 31 May 2024.

~~*(xvii) Traffic Impact Assessment prepared by Northern Transport Planning and Engineering Pty Ltd, dated 11 January 2023*~~

(xvii) Assessment of Parking and Traffic Impacts prepared by Stanbury Traffic Planning dated 15 May 2024

(xviii) Utilities Report prepared by ACOR Consultants (CC) Pty Ltd, dated 29 July 2022

(xix) Visual Impact Assessment prepared by Terras Landscape Architects, Rev A, dated 02 August 2022

(xx) Waste Management Plan for 60 And 62-64 Showground Road Gosford (Lots 1-4 On SP 20095 And Lots 1-6 On SP 20058) – Proposed Mixed Use Development Including Integrated Health Hub Facility And Specialist Disability Accommodation, dated August 2022

B7 Car Parking and Service Vehicle Layout

It is proposed to amend condition B7 as follows (amendments in **bold**):

Car Parking and Service Vehicle Layout

B7. Prior to the issue of any relevant construction certificate for car parking and service vehicle parking / loading / unloading areas, evidence must be submitted to the Certifier that the operational access and parking arrangements comply with the following requirements:

- (a) all vehicles can enter and leave the Site in a forward direction;*
 - ~~*(b) 228 (216 carparking spaces) on-site car parking spaces are included for use during operation of the development, and designed in accordance with the latest versions of AS 2890.1 and AS 2890.6;*~~
 - (b) 162 on-site car parking spaces are included for use during operation of the development, and designed in accordance with the latest versions of AS 2890.1 and AS 2890.6;***
 - ~~*(c) eight (8) of the above car parking spaces and one (1) visitors spaces are to be nominated for residential use only;*~~
 - (d) the swept path of the longest vehicle entering and exiting the Site in association with the new work, as well as manoeuvrability through the Site, are in accordance with the latest version of AS 2890.2;*
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- (e) *there is no conflict between swept paths and building features, including with respect to the boom gate, any ticket collection or parking payment point, waste collection vehicle access to or reversing from the refuse bay, and vehicle swept paths around the Main Switch Board (MSB) space into and out of the basement; and*
- (f) *the safety of vehicles and pedestrians accessing adjoining properties, where shared vehicle and pedestrian access occurs, has been addressed. .*

3. Discussion

In particular, the following modifications are proposed to the building:

Floor Plan Basement 4 – Deleted

Floor Plan Basement 3 – Amend parking layout from 68 car spaces, 2 accessible parking spaces and motorcycle bay (approved) to 42 including 5 tandem spaces, add 767m² GFA medical tenancy/treatment centre. The radiation oncology tenancy has been included in basement 3 to accommodate the specific radiation safety requirements associated with radiotherapy. This includes significant structural work to construct and house the double radiation “bunker” and “entry maze” to accommodate the linear accelerator machines for use in radiotherapy and treatment of cancer and oncology patients. The below extract from the Australian Health Facility Guidelines – Part B – Health Facility Briefing and Planning – 0600 – Radiation Oncology Unit is relevant:

02.03 Planning Models *LOCATION*

A Radiation Oncology Unit should generally be on ground level or underground due to the shielding requirements.

In relation to the radiation oncology tenancy, a supporting letter has been provided by Axis Building Certification – refer **Attachment 11** confirming that there is no requirement for natural light in this tenancy under the BCA/NCC. Instead, artificial lighting will be used. The Certifier has specifically noted that the BCA’s requirement for natural light only applies to rooms used for sleeping (such as bedrooms). Additionally, compliant ventilation will be provided to the tenancy through a mechanical system that complies with AS1668.2 and AS3666.1, rather than relying on natural ventilation. Furthermore, compliant access and emergency egress will be ensured via the two Fire Stairs located in opposing corners and the provision of the Emergency Lift, as per the BCA/NCC.

Floor Plan Basement 2 - Amend parking layout from 68 car spaces, 2 accessible parking spaces and motorcycle bay (approved) to 70 car spaces;

Floor Plan Basement 1 – Amend parking spaces from 45 car spaces, 2 accessible car spaces, 1 SDA drop off space, 2 van spaces, 1 motorcycle bay (approved) to 44 car spaces, 4 accessible car spaces, 9 motorcycle bays, 2 van spaces and 28 bike parks.

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The proposed change in total number of car parking spaces is shown in the Table 1 below:

Table 1- Parking Metrics

Approved	Proposed
216 car spaces	156 car spaces
6 Accessible car spaces	4 Accessible car spaces
3 motorcycle bays	11 motorcycle bays
1 SDA drop off space	2 van spaces
2 van spaces	
Total car spaces 225	Total car spaces 162

Ground Floor – Changes include:

- Reconfiguring ground floor to include medical suites, relocated café and associated outdoor seating area on both sides of building entry;
- Reconfiguring internal service areas including increasing size of hydrant/pump room, relocating waste rooms, accessible toilet and lifts/lift lobby, widening service lobby area, changing internal stairs;
- Relocating main building entry;
- Relocating driveway ramp away from rear boundary with new medical storage area to be located adjoining rear boundary for length of 13m;
- Reducing setback of medical suites along rear boundary from 4m-3m;
- Two motorcycle bays and 20 bike parks;

Reconfiguring ground floor internal service areas and relocating the building entry will enhance useability and ensure the more efficient future operation of the building with minor changes to its appearance. The building as proposed will continue to encourage an active streetscape with extensive outdoor dining fronting Showground Road, large glass doors to the main building lobby and café tenancy, full height glazing to the ground floor tenancy combined with generous areas for integrated landscaping. Pedestrian activity is encouraged with an accessible pathway connecting the 3 major building elevations and street frontages providing access to the building from the most prominent locations.

The revised design includes a widened building entryway to improve visibility from the street and retains good levels of accessibility as well as an extensive outdoor dining area, directly addressing previous comments made by the City of Gosford Design Advisory Panel in their advice dated 24 February 2022.

Overall, the building will provide a positive contribution to the locality in terms of its design quality and finishes and reinforce the existing established health care precinct.

The medical storage area wall along the (rear) western boundary (Medical Gas) will be approximately 4m high for a length of length of 13m, with the remainder of the

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building being set back from the rear boundary. In addition, the overall height of the building has been reduced by approximately 3.1m from that which is already approved which will reduce visual bulk and overshadowing impacts on neighbouring properties.

First Floor - Minor changes including:

- Reconfiguring floor plate to be consistent with relocated lift core and fire stairs.

Second Floor - Minor changes including:

- Reconfiguring floor plate to be consistent with relocated lift core and fire stairs.

Third Floor - Minor changes including:

- Reconfiguring floor plate to be consistent with relocated lift core and fire stairs.

Fourth Floor - Changes include:

- Reconfiguring floor plate to include Medical Suites (872m² GFA) and landscaped courtyard.

Fifth Floor – Deleted

Roof plan – Amend to include concrete roof deck over Medical Suites (RL 35.100) with centrally located lift overrun (RL 32.380).

North Elevation - Changes to window openings, materials and finishes.

East Elevation – Relocation of building entry, changes to materials and finishes and window openings at fourth floor.

South Elevation - Changes to window openings, materials and finishes.

West Elevation – Changes to materials and finishes and window openings at fourth floor.

The proposed modifications are shown in the amended drawing set prepared by TVS Architects at **Attachment 1**.

The impacts of each of the changes is discussed in detail below:

Basement Excavation

Deleting basement level 4 changes proposed excavation. An amended excavation plan prepared by TVS Architects is included at **Attachment 1**. The approved extent of basement level 4 slab (FFL -300) is 1137.4m². The proposed extent of basement level 3 slab (FFL -1.060) is 968.7m².

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A Geotechnical Investigation prepared by BHM Geotechnical assessing the proposed excavation is included at **Attachment 2**. The excavation for the proposed development is anticipated to encounter mostly bedrock at depths ranging from 4m to 9m. Excavation within fill would be achievable using conventional earthmoving equipment such as a hydraulic excavator bucket. Excavation of extremely weathered siltstone or sandstone may also be achievable using conventional earthmoving equipment attached with a tooth bucket or single ripper attachment.

Where rock quality becomes greater at depth, excavation will require the use of hydraulic hammers supplemented with rock sawing and rock splitting techniques.

The report sets out recommendations regarding subgrade preparation, general earthworks, underpinning, excavation, batter slopes, design parameters, footings and retaining.

The report further recommends hold points during the construction process, including:

1. Geotechnical Engineer to review final structural documentation for their suitability from a geotechnical standpoint;
2. Contractors Geotechnical Engineer to inspect the excavation in every 1.5 m and be approved to proceed;
3. Contractors Geotechnical Engineer to be present on site at all times during drilling of piles;
4. Should rock bolts or anchors be chosen to be used as part of the design, the contractors geotechnical engineer must be present on site during the drilling of the bolt holes.

Further, condition D31 of the current consent includes requirements relating to the shoring and adequacy of adjoining properties.

Gross Floor Area

Table 2 sets out the proposed changes to Gross Floor Area (GFA).

Table 2 – GFA Calculations

Level	Approved m ²	Proposed m ²
Basement Level 3	-	767.7
Ground Floor	1030.6	1053.3
First Floor	1639.8	1634.7
Second Floor	1639.8	1634.2.
Third Floor	1639.8	1634.2
Fourth Floor	1608.1	872.1
Fifth Floor	651.3	-
TOTAL	8209.4	7596.2

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Basement Level 4 has been deleted. The changes to GFA at Basement Level 3 reflect the proposed treatment centre and at the top level, (now fourth floor) the SDA being replaced with medical suites.

Net Lettable Area

The proposal has a net lettable area (NLA) of 6756.57m². Drawing DA00.002 includes a breakdown of NLA per level.

State Environmental Planning Policy (Precincts Regional) 2021

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 State Environmental Planning Policy (SEPP Precincts Regional) 2021 since the site area is less than 2800m² (2437m²). 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. “

GFA is defined in SEPP 2021 as:

*“**gross floor area** means the sum of the floor area of each floor of a building measured from the internal face of external walls, or from the internal face of walls separating the building from any other building, measured at a height of 1.4 metres above the floor, and includes—*

- (a) the area of a mezzanine, and*
- (b) habitable rooms in a basement or an attic, and*
- (c) any shop, auditorium, cinema, and the like, in a basement or attic, but excludes—*
 - (d) any area for common vertical circulation, such as lifts and stairs, and*
 - (e) any basement—*
 - (i) storage, and*
 - (ii) vehicular access, loading areas, garbage and services, and*
 - (f) plant rooms, lift towers and other areas used exclusively for mechanical services or ducting, and*
 - (g) car parking to meet any requirements of the consent authority (including access to that car parking), and*
 - (h) any space used for the loading or unloading of goods (including access to it), and*
 - (i) terraces and balconies with outer walls less than 1.4 metres high, and*
 - (j) voids above a floor at the level of a storey or storey above.*

The amended development has a proposed GFA of 7596.2m² which translates into an FSR of 3.11:1 which is below the 4:1 limit for the site using the above formula.

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Building Height

Clause 5.25 of SEPP Precincts Regional relates to the maximum height of buildings. The site is identified on the Height of Buildings Map as having a maximum permissible building height of 18 metres. Building Height is defined in SEPP Precincts Regional as:

“the vertical distance from ground level (existing) to the highest point of the building, including plant and lift overruns, but excluding communication devices, antennae, satellite dishes, masts, flagpoles, chimneys, flues and the like.”

The approved development has a maximum height of RL 35.474 (top of roof pitch of SDA Units) with lift overrun RL 35.400 – refer **Figure 1** below. The approved development exceeded the 18m height limit by a maximum of 4.1m on southern side.

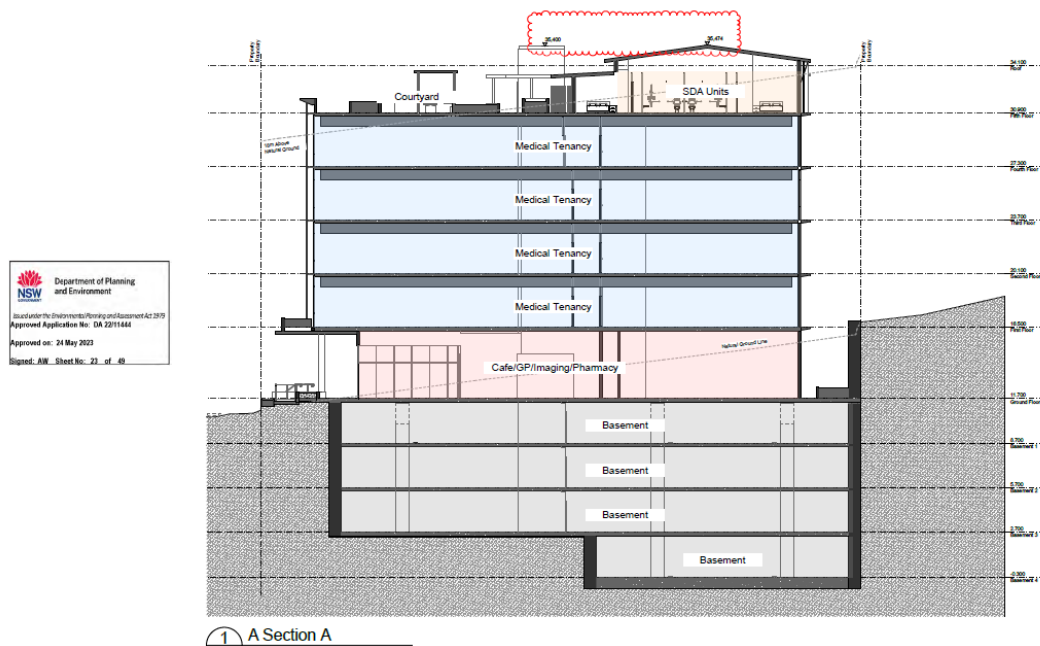


Figure 1 – Approved building height

Excluding roof top plant (RL 34.050), the amended development has a maximum height of RL31.500 (top of medical tenancies) with lift overrun being RL 32.380. The lift overrun has a small area and is located in the centre of the building - refer **Figure 2** below and amended drawing set prepared by TVS Architects at **Attachment 1**. At the fourth floor, the medical tenancies will be located on the western side of the building in the area previously occupied by the SDA, with the landscaped courtyard on the eastern side to remain.

Because of the height non-compliance, the approved development was subject to the provisions of clauses 5.45 and 5.46 of SEPP Precincts Regional that allow for variation to the nominal floor space and building height controls where that development achieves design excellence.

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The overall reduction in building height will reduce the visual bulk of the building and associated overshadowing impacts on adjoining properties.

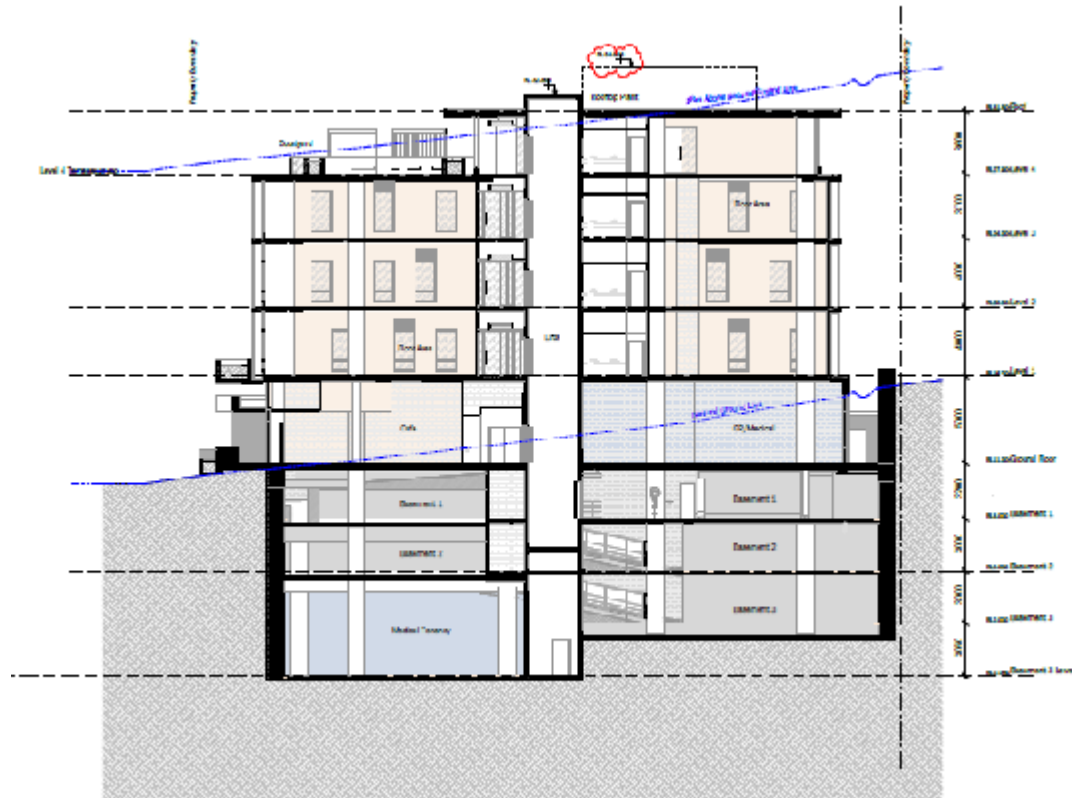


Figure 2 – Proposed building height

Materiality and Façade Treatment

Materials for the proposed development are similar to those already approved and are set out in the Architectural Plans at **Attachment 1**. Materials include dark and light feature bricks, exposed feature concrete, aluminium battens and fibre cement cladding, all chosen to suit local conditions and ensure a high degree of environmental performance. The fourth floor medical suites will include extensive glazing. A Design Comparison Report and Design Excellence Statement have been prepared by TVS Architects in support of the proposed amendments and are included at **Attachments 4 and 5**.

Basement Parking and Traffic Generation

The proposed amendments will reduce the overall number of basement car spaces from 225 to 162, including 4 accessible spaces and 2 van spaces. An Assessment of Parking and Traffic Impacts justifying the changes is provided by Stanbury Traffic Planning at **Attachment 3**.

In relation to car parking, using the previously adopted parking rate in the original traffic report - 3.1 parking spaces per 100m² of medical related tenancy floor space (183 spaces) plus 3 spaces for the retail cafe component (calculated at a rate of 1 space per 40m²), the amended development generates a requirement for 186 parking spaces.

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The above calculation excludes the radiation oncology tenancy at basement level 3 since the nature of the oncology tenancy is such that it primarily accommodates equipment with very few staff or visitors on a daily basis.

Based on the above calculations, the provision of 162 parking spaces results in a parking shortfall of 24 spaces. The parking shortfall is considered to be acceptable for the following reasons:

- The site is located in close proximity to rail services operating out of Gosford Railway Station and bus services operating along Racecourse Road; and
- The car parking shortfall is off-set by the proposed addition of 8 motorcycle parking spaces and 37 bicycle parking spaces over and above that previously approved.

The Traffic and Parking Report includes a site-specific Green Travel Plan which provides a series of site-specific operational initiatives to promote the adoption of sustainable modes of transport to and from the site by staff and visitors and therefore reduce the potential private vehicle trips and associated demand for car parking.

The development is expected to be self-sufficient in terms of car parking based on the above assessment.

B17 – Amendments to Plans

It is proposed to delete Condition B17 which is currently set out as follows:

B17. Prior to the issue of any relevant Construction Certificate, amended architectural- and landscape- plans must be submitted to the satisfaction of the Certifier demonstrating that the proposed transformer, and any other plant or similar servicing equipment, is set back at least 14m from the front property boundary.

Ausgrid have indicated a strong preference to have transformers located in easily accessible locations. Reference to Ausgrid's *NS113 Site Selection and Construction Design Requirements* notes the requirements for clear access free of any other building, structure or services excluding services directly related to the transformer. To this end the transformer has been strategically placed away from the main pedestrian entrance to the building but close to the vehicular access to site. Landscaped screening is proposed to limit any visual impacts associated with the transformer – refer amended landscape drawing L01 at **Attachment 8**.

State Environmental Planning Policy (Sustainable Buildings) 2022

SEPP (Sustainable Buildings) 2022 aims to encourage the design and delivery of sustainable buildings, to minimise the consumption of energy and reduce greenhouse gas emissions. Clause 4.2 (1)(f) of the SEPP – savings and transitional provisions - sets out that this policy does not apply to the following:

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(f) an application for modification of a development consent under the Act, section 4.55 or 4.56 submitted on the NSW planning portal on or after 1 October 2023, if the development application for the development consent was submitted on the NSW planning portal before 1 October 2023.

The parent development application for the consent was submitted before 1 October 2023, therefore the SEPP does not apply to this S4.55(2) modification application.

State Environmental Planning Policy (Transport and Infrastructure) 2021

State Environmental Planning Policy (Transport and Infrastructure) 2021 aims to facilitate the effective delivery of infrastructure across the state.

Section 2.98 of the SEPP sets out the following in relation to development adjacent to rail corridors:

- “(1) This section applies to development on land that is in or adjacent to a rail corridor, if the development—*
- (a) is likely to have an adverse effect on rail safety, or*
 - (b) involves the placing of a metal finish on a structure and the rail corridor concerned is used by electric trains, or*
 - (c) involves the use of a crane in air space above any rail corridor, or*
 - (d) is located within 5 metres of an exposed overhead electricity power line that is used for the purpose of railways or rail infrastructure facilities.*
- (2) Before determining a development application for development to which this section applies, the consent authority must—*
- (a) within 7 days after the application is made, give written notice of the application to the rail authority for the rail corridor, and*
 - (b) take into consideration—*
 - (i) any response to the notice that is received within 21 days after the notice is given, and*
 - (ii) any guidelines that are issued by the Secretary for the purposes of this section and published in the Gazette.”*

The site is separated from the rail corridor by Showground Road. In relation to 1(c) above, the crane would be located in the middle of the site in the area of the lift core and will have a maximum boom length of 37m, therefore extending to the opposite side of Showground Road and being clear of the rail corridor. The distance from the Showground Road property boundary to the rail corridor boundary is approximately 28m.

Section 2.99 sets out the following in relation to excavation in, above, below or adjacent to rail corridors:

- (1) This section applies to development (other than development to which section 2.101 applies) that involves the penetration of ground to a depth of at least 2m below ground level (existing) on land—*
- (a) within, below or above a rail corridor, or*
 - (b) within 25m (measured horizontally) of a rail corridor, or*

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- (c) *within 25m (measured horizontally) of the ground directly below a rail corridor, or*
- (d) *within 25m (measured horizontally) of the ground directly above an underground rail corridor.*
- (2) *Before determining a development application for development to which this section applies, the consent authority must—*
 - (a) *within 7 days after the application is made, give written notice of the application to the rail authority for the rail corridor, and*
 - (b) *take into consideration—*
 - (i) *any response to the notice that is received within 21 days after the notice is given, and*
 - (ii) *any guidelines issued by the Planning Secretary for the purposes of this section and published in the Gazette.*

As discussed above, the distance from the Showground Road property boundary to the rail corridor boundary is approximately 28m.

Schedule 3 of SEPP (Transport and Infrastructure) 2021 sets out thresholds for referring development to Transport for New South Wales. 162 basement parking spaces are proposed which is below the threshold.

Gosford City Centre Development Control Plan 2018

Table 3 below sets out how the amended proposal complies with the relevant controls in Gosford DCP 2018:

Table 3 Gosford City Centre Development Control Plan

DCP Section	Complies	Comments
4.1 Pedestrian network	Yes	The amended proposal is consistent with the pedestrian priorities identified for around the site. The main area noted for enhancement is the public space opposite the site adjoining the railway line.
4.2 Public open space	Yes	As noted above, the amended proposal is consistent with the public open space priorities identified around the site.
4.3 Solar access to key public spaces	Yes	The amended proposal does not overshadow any nominated open spaces.
4.4 Views and vistas	Yes	No significant views are affected by the proposal.
5.2.1 and 5.2.2 Minimum front setback – 3-4m at ground level, 6-14m street wall height – Figure 8 of DCP	Partial	Minimum 3.6m at ground floor level Minimum 3.6m, Levels 1-4 Minimum 6m to edge of balcony – Level 4
Minimum side setbacks - 3m up to street wall, 6m above street wall -	Generally Complies	3m on northern side, 4.8m - Ground floor level on southern

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DCP Section	Complies	Comments
refer Figure 8 of DCP		<p>side</p> <p>3.5m – 4.5m – levels 1-3 on southern side</p> <p>4m-4.5m – level 4 on southern side</p> <p>Rear setback – 3m at ground floor (other than medical storage area) and 4m above. The medical storage area wall along the (rear) western boundary (Medical Gas) will be approximately 4m high for a length of length of 13m, with the remainder of the building being set back from the rear boundary. In addition, the overall height of the building has been reduced by approximately 3.1m from that which is already approved which will reduce visual bulk and overshadowing impacts on neighbouring properties.</p>
5.2.2 Street wall heights and upper podium	Generally Complies	
5.2.3 Active street frontage and street address	Yes	<p>The amended design will continue to encourage an active streetscape with extensive outdoor dining fronting Showground Road, large glass doors to the main building lobby and café tenancy, full height glazing to the ground floor tenancy combined with generous areas for integrated landscaping. Pedestrian activity is encouraged with an accessible pathway connecting the 3 major building elevations and street frontages providing access to the building from the most prominent locations. Overall, the building will provide a positive contribution to the locality in terms of its design quality and finishes and reinforce the existing established health care precinct.</p>
5.2.4 Building setbacks and separation	Generally Complies	<p>Building setbacks and separation generally comply with Figure 8 in the DCP to maintain Gosford's character of visual openness and provide good amenity for building occupants including daylight, outlook, visual privacy, acoustic amenity, ventilation, wind mitigation and view sharing.</p>
5.2.5 Slender tower with high amenity	Yes	<p>Floorplates are sized at approximately 1500m² (levels 1-3) to achieve high amenity for the public domain and allow for view sharing and view corridors.</p>

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DCP Section	Complies	Comments
5.2.6 Fine grain frontages 40m maximum continuous street frontage length of an individual podium	Yes	Podium form has been articulated into smaller elements at a scale or grain that responds to the human scale.
5.2.7 Awnings	N/A	No awning has been proposed to the Showground Road frontage.
5.2.8 Building sustainability and environmental performance	Yes	Sustainability has been achieved through the design and orientation of the building, materials to be used and landscaping..
5.2.9 Above ground parking Car parking is to be provided underground	Yes	Car parking is proposed at basement level.
5.2.11 Internal amenity For commercial office uses, all areas should be within 10m of a source of daylight.	Yes	The proposal includes window openings to floor plates including internal corridors to ensure good levels of internal amenity.
5.2.12 Building services and the streetscape Services to be integrated into building design	Yes	The ground floor includes integrated service areas such as fire pump room, transformer. ambulance bays and refuse room. Building services do not intrude on the public domain.
5.2.13 Landscape design	Yes	Amended landscape plans are provided which are integrated into the overall design – refer Attachment 8 .
5.2.14 Site cover and deep soil zones Site cover 75% Must have a deep soil area		The proposed development has a site coverage of approximately 70%, allowing for substantial opportunities for soft landscaping.
5.2.15 Front Fences To clearly define the interface between the public and private domain.	N/A	No front fences are proposed.
5.2.16 Safety and Security To ensure developments are safe and secure for pedestrians.	Yes	The amended proposal incorporates Crime Prevention through Environmental Design principles by increasing activation and passive surveillance along Showground Road. The entry lobby provides a strong visual connection with the street.
5.2.17 Building Exteriors Contribute positively to the streetscape and public domain by means of high quality architecture and robust selection of materials and finishes.	Yes	A Design Comparison Report and Design Excellence Statement have been prepared by TVS Architects in support of the proposed amendments and are included at Attachments 4 and 5 . Following an analysis of the Gosford Health District and greater

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DCP Section	Complies	Comments
		Gosford Context, architectural styles and materials have been integrated into the proposal.
<p>7.2 Pedestrian Access and Mobility</p> <p>Main building entry points should be clearly visible from primary street frontages and enhanced as appropriate with awnings, building signage or high quality architectural features that improve clarity of building address.</p> <p>All development must provide continuous access paths of travel from all public roads and spaces as well as unimpeded internal access.</p> <p>The design of facilities (including car parking requirements) for disabled persons must comply with the relevant Australian Standard (AS 1428 Pt 1 and 2, or as amended) and the <i>Disability Discrimination Act 1992</i> (as amended).</p>	Yes	<p>Building entry is clearly visible, offering direct pedestrian access off the primary street frontage. The entry lobby width has been increased and building entry reconfigured to provide a stronger visual connection with the street.</p> <p>A continuous path of travel to the main entrance and building lobby/lift area is available off the footpath.</p> <p>Facilities for disabled persons will comply with the relevant Australian Standard (AS 1428 Pt 1 and 2, or as amended) and the <i>Disability Discrimination Act 1992</i> (as amended).</p>
<p>7.3 Vehicular Driveways and Manoeuvring areas</p> <p>Driveways should be:</p> <ol style="list-style-type: none"> provided from lanes and secondary streets rather than the primary street, wherever practical, located taking into account any services within the road reserve, such as power poles, drainage inlet pits and existing street trees, located a minimum of 6 metres from the perpendicular of any intersection of any two roads, and if adjacent to a residential development, setback a minimum of 1.5m from the relevant side property boundary. 	Yes	<p>The site only has frontage to Showground Road so it is not possible to provide driveway access from a secondary street.</p> <p>The proposed driveway is located at the lower end of the Showground Road frontage close to the south eastern corner of the site, away from the existing pedestrian crossing, but sufficiently far enough away from the southern boundary (4.8m).</p> <p>There are sufficient manoeuvring areas within the site to enable vehicles to enter and exit in a forward direction.</p>
<p>7.4 On-Site Parking</p> <p>Commercial and retail – 1 space per 75m²</p> <p>Medical Centre - 3 spaces/surgery or consulting room, plus 1 space for each professional practitioner and other staff present at any one</p>		<p>162 basement parking spaces are proposed including 4 accessible spaces and 2 van spaces along with motorcycle and bicycle parking.</p> <p>A Traffic and Parking Assessment prepared in support of the modified development by Stanbury Traffic Planning is provided at Attachment 3.</p>

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DCP Section	Complies	Comments
time		Overall it is considered that adequate parking is provided taking into account the location of the proposed development in close proximity to Gosford Station and local bus routes, and the proposed mix of uses within the building which is comparable to other similar CHP Developments.
7.5 Site Facilities and Services All development is to accommodate waste handling and storage on site.	Yes	Suitable waste management facilities are provided at ground floor level.
8.2 Energy Efficiency and Conservation	Yes	The building footprint, facade design and materials to be used achieve good energy efficiency outcomes. The reduced height of the amended development will ensure reduced shadow impacts on adjoining properties.
8.3 Water Conservation	Yes	The stormwater and water cycle management plan prepared in support of the amended development – refer Attachment 7 demonstrates measures to harvest rainwater and reduce urban stormwater runoff. The proposed development has a site coverage of approximately 70%, allowing for substantial opportunities for soft landscaping to further reduce stormwater runoff. Where appropriate, the development will incorporate initiatives to reduce wastewater discharge and reuse wastewater.
8.4 Reflectivity	Yes	Materials to be used are contained in the amended Architectural Plans at Attachment 1 and have been chosen to suit local conditions, achieve greater energy efficiency and reduce reflectivity.
8.5 Wind Mitigation	Yes	The building is well spaced from other tower buildings and its location and design are not anticipated to cause discomfort and danger to pedestrians in terms of wind effects.
8.6 Waste and Recycling	Yes	Suitable waste management facilities are provided at ground floor level.
8.7 Noise and Vibration	Yes	An acoustic report prepared by RCA Australia was prepared in support of the original development. The report

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DCP Section	Complies	Comments
		considers transport noise from Showground Road and the rail line, as well as nearby rooftop mechanical plant and the Gosford Hospital car park, and, to achieve noise reductions, recommends measures to the facades of the proposed building in accordance with the noise treatment construction categories set out in Appendix C of the Department of Planning document <i>Development Near Rail Corridors and Busy Roads - Interim Guidelines</i> .
9.1 Housing Choice and Mix Provide a mix of dwelling types	Yes	The SDA units have been deleted.
9.2 Storage	Yes	Storage is available at basement level.

4. Relevant Provisions of Section 4.55

Section 4.55 (2) of the Environmental Planning and Assessment Act, 1979 is set out as follows:

- (2) **Other modifications** A consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the regulations, modify the consent if—
- (a) *it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which consent was originally granted and before that consent as originally granted was modified (if at all), and*
 - (b) *it has consulted with the relevant Minister, public authority or approval body (within the meaning of Division 4.8) in respect of a condition imposed as a requirement of a concurrence to the consent or in accordance with the general terms of an approval proposed to be granted by the approval body and that Minister, authority or body has not, within 21 days after being consulted, objected to the modification of that consent, and*
 - (c) *it has notified the application in accordance with—*
 - (i) *the regulations, if the regulations so require, or*
 - (ii) *a development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for modification of a development consent, and*
 - (d) *it has considered any submissions made concerning the proposed modification within the period prescribed by the regulations or provided by the development control plan, as the case may be.*

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Subsections (1) and (1A) do not apply to such a modification.

In relation to 4.55(2)(a) the Minister can be satisfied that the development as proposed to be modified will be substantially the same development as that approved under the Consent, for the following reasons:

- The modified building has a similar footprint, setbacks and configuration to that which is already approved, but will have a reduced bulk and scale due to its lower height and reduced overshadowing impacts on adjoining properties and the public domain;
- The modified building is proposed to accommodate a multi-disciplinary health hub including medical centre with ancillary ground floor retail and basement parking. These uses are the same as previously approved other than the specialist disability accommodation at roof top level;
- Materials to be used and façade treatments are similar to that which is already approved and will continue to ensure a high standard of environmental performance. The amended design will continue to encourage an active streetscape with the driveway entry remaining in the same location as that which is already approved, extensive outdoor dining remaining fronting Showground Road, large glass doors to the main building lobby and café tenancy, full height glazing to the ground floor tenancy combined with generous areas for integrated landscaping.
- The proposed modifications are substantially contained within the approved building envelope, are related to future operational efficiency of the building and will have a minor impact on the overall appearance of the building.

Section 4.55(3) further states as follows:

- (3) *In determining an application for modification of a consent under this section, the consent authority must take into consideration such of the matters referred to in section 4.15(1) as are of relevance to the development the subject of the application.*

Section 4.15(1)(a) – Statutory Planning Considerations

Section 4.15 (1) (a) requires the consent authority to take into consideration of:

“(a) the provisions of:

- (i) any environmental planning instrument, and*
- (ii) any draft environmental planning instrument that is or has been placed on public exhibition and details of which have been notified to the consent authority (unless the Director-General has notified the consent authority that the making of the draft instrument has been deferred indefinitely or has not been approved), and*
- (iii) any development control plan, and*
- (iiia) any planning agreement that has been entered into under section 93F, or any draft planning agreement that a developer has offered to enter into under section 93F, and*

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- (iv) *the regulations (to the extent that they prescribe matters for the purposes of this paragraph), that apply to the land to which the development application relates,”*

The development in its modified form will continue to be permitted in the current B4 Mixed Use zone pursuant to SEPP (Precincts Regional) 2021. An assessment of the proposal against the relevant provisions of SEPP (Precincts Regional) 2021 and Gosford City Centre DCP 2018 is included in Section 3 above.

Section 4.15(1)(b) – Environmental, Social and Economic Impacts

Section 4.15(1) (b) requires the consent authority to consider:

- “(b) *the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.”*

Impacts on the Natural Environment

There will be no additional issues relating to stormwater and flooding (including coastal hazards and sea level rise), erosion and sediment or flora and fauna from the modification.

Impacts on the Built Environment

Significantly, the modified building will have reduced bulk, scale and overshadowing impacts on neighbouring properties and the surrounding locality due to its lower height. Further, the reduced parking (225 basement spaces down to 162) will encourage future users to use alternative modes of transport.

The approved level of excavation is being modified slightly and an updated geotechnical report assessing the additional excavation is included at **Attachment 2**.

Overall, the modified proposal will continue to promote a high standard of environmental performance, incorporating the principles of ecologically sustainable development, contributing positively to the amenity of the built environment and promoting the orderly and economic use and development of land.

Social and Economic Impacts

The amended proposal has substantial social and economic benefits, placing a high-quality health care facility which achieves design excellence, into a location which will reinforce the existing established health care precinct in Gosford. The proposal will also result in the creation of additional employment in Gosford during the construction phase and operation of the development.

Section 4.15(1)(c) – The Suitability of the Site

Section 4.15(1)(c) requires the consent authority to consider:

- “(c) *the suitability of the site for the development.”*

The site has already been approved for development and is able to accommodate the proposed modification.

Section 4.15(1)(d) – Submissions

Section 4.15(1)(d) requires the consent authority to consider:

“(d) any submissions made in accordance with this Act or the regulations”.

Any relevant representations will need to be considered by the Minister.

Section 4.15(1)(e) – Public Interest

Section 4.15(1)(e) requires the consent authority to consider:

“(e) the public interest”.

The public interest is best served by the orderly and economic use of land for purposes permissible under the relevant planning regime and predominantly in accordance with the prevailing planning controls. The modification as proposed will not result in any additional environmental impacts and is therefore considered to be in the public interest.

5. Supporting Documentation

This correspondence forms part of the Section 4.55(1A) Application. Accompanying this correspondence are the additional supporting documents outlined below. All correspondence and supporting documentation has been attached to this letter for ease of reference and comprises the following:

- A completed Section 4.55(2) application form;
- Amended Architectural Drawing Set prepared by TVS Architects at **Attachment 1**;
- Amended Geotechnical Report prepared by BHM Geotechnical Pty Ltd at **Attachment 2**;
- Supporting Assessment of Parking and Traffic Impacts prepared by Stanbury Traffic Planning at **Attachment 3**;
- Design Comparison Report prepared by TVS Architects at **Attachment 4**;
- Design Excellence Statement prepared by TVS Architects at **Attachment 5**;
- Amended Erosion and Sediment Control Plan prepared by ACOR at **Attachment 6**;
- Amended Stormwater and Water Cycle Management Plan prepared by ACOR at **Attachment 7**;
- Amended Landscape Drawings prepared by Terras Landscape Architects at **Attachment 8**;
- Cost Summary Report prepared by Aplas Quantity Surveyors at **Attachment 9**;
- Waste Management Plan at **Attachment 10**.
- Building Certification letter at **Attachment 11**.

6. Payment

With respect to application payment, please contact Luke Goodwin on 0407 755 880 or luke.goodwin@chpfund.com.

7. Conclusion

This Section 4.55(2) application seeks approval to modify the development consent granted by the Minister to DA 22/11144 on 24 May 2023 for an integrated health hub facility and disability accommodation.

Broadly, the amendments relate to reducing the size of the building, including deleting a level of basement parking and one level of medical tenancies, an additional medical tenancy/treatment centre at Basement Level 3, reconfiguring the ground floor layout and internal service areas, and as a consequence, floor plates above to ensure the efficient future operation of the building and replacing the previously approved Specialist Disability Accommodation (SDA) on the top floor (now fourth floor) with medical suites.

Cornerstone have had feedback from the market that the co-location of Medical Suites and SDA Housing may not be ideal and that there is significant demand for Medical Suites in the locality.

In relation to 4.55(2)(a) the Minister can be satisfied that the development as proposed to be modified will be substantially the same development as that approved under the Consent and the modifications for which consent is now sought do not alter the original findings made in relation to DA 22/11144 regarding the reasonableness and appropriateness of the proposal when considered in the light of the matters listed in Section 4.15 of the Environmental Planning and Assessment Act, 1979.

The modified building will have reduced bulk, scale and overshadowing impacts on neighbouring properties and the surrounding locality due to its lower height. Further, the reduced parking (225 basement spaces down to 162) will encourage future users to use alternative modes of transport.

Importantly, the building as proposed will continue to encourage an active streetscape with extensive outdoor dining fronting Showground Road, large glass doors to the main building lobby and café tenancy, full height glazing to the ground floor tenancy combined with generous areas for integrated landscaping.

Overall, the modified proposal will continue to promote a high standard of environmental performance, incorporating the principles of ecologically sustainable development, contributing positively to the amenity of the built environment and promoting the orderly and economic use and development of land.

The Minister is therefore respectfully requested to approve the proposed modifications.

Should you require any further details, please do not hesitate to contact the undersigned. We trust that you will find the application acceptable and look forward to your favourable determination.

Yours sincerely



Andrew Biller
DIRECTOR METROPLAN SERVICES

Attachments

1. Amended Architectural Drawing Set prepared by TVS Architects;
2. Amended Geotechnical Report prepared by BHM Geotechnical Pty Ltd;
3. Supporting Assessment of Parking and Traffic Impacts prepared by Stanbury Traffic Planning;
4. Design Comparison Report prepared by TVS Architects;
5. Design Excellence Statement prepared by TVS Architects;
6. Amended Erosion and Sediment Control Plan prepared by ACOR;
7. Amended Stormwater and Water Cycle Management Plan prepared by ACOR;
8. Amended Landscape Drawings prepared by Terras Landscape Architects;
9. Cost Summary Report prepared by Aplas Quantity Surveyors;
10. Waste Management Plan.
11. Building certification letter re radiology clinic.

