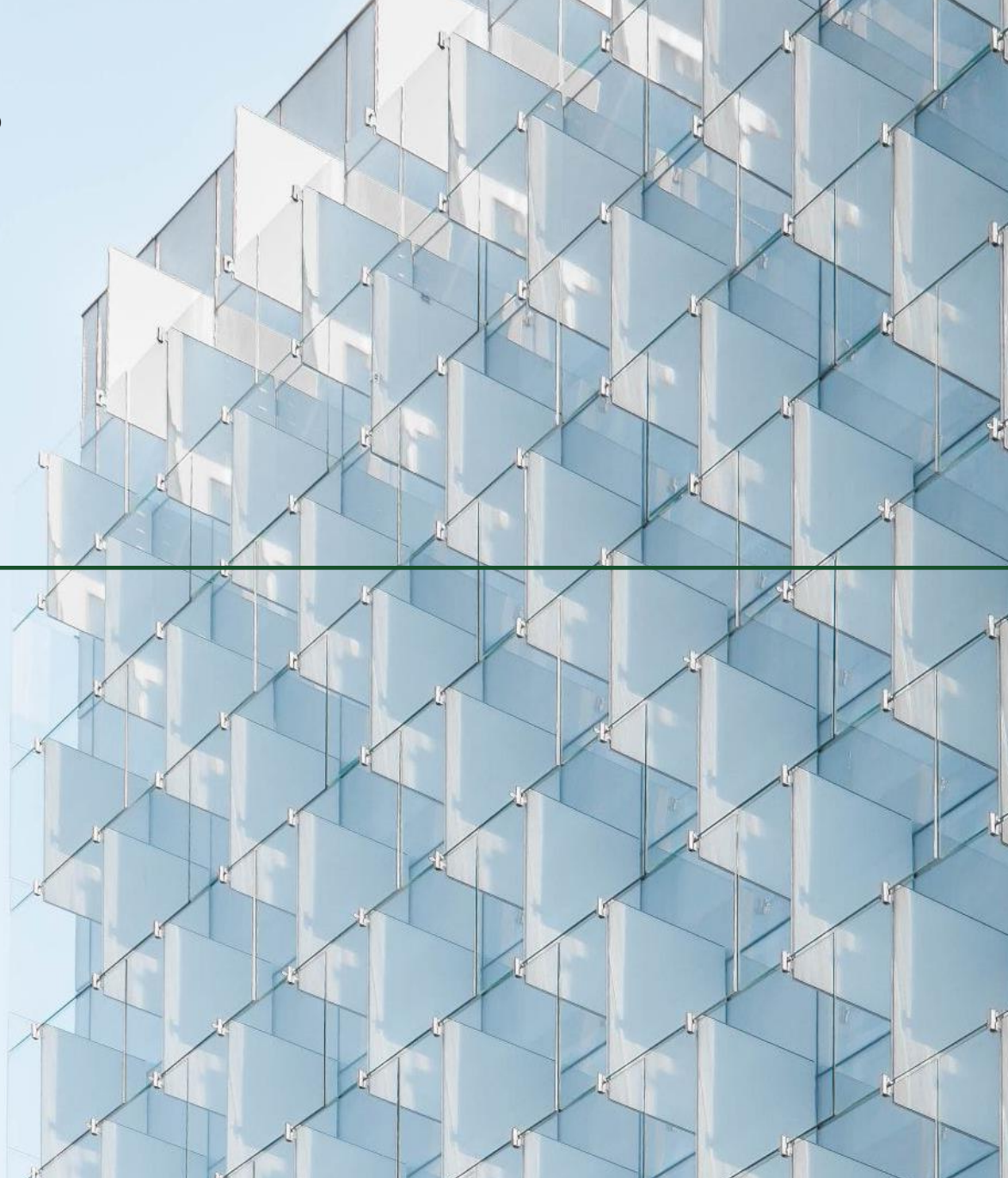


Ref: **SSD-17899480**
WTJ20-395



WILLOWTREE PLANNING

RESPONSE TO SUBMISSIONS: WENTWORTHVILLE NORTHSIDE WEST CLINIC EXTENSION

23-27 LYTTON STREET, WENTWORTHVILLE
LOT 1 DP787784

—
Prepared by Willowtree Planning Pty Ltd
on behalf of Ramsay Health Care

16 August 2022

SYDNEY

—

Suite 1, Level 10,
56 Berry Street
North Sydney NSW 2060

NEWCASTLE

—

Unit 2,
56 Hudson Street
Hamilton NSW 2303

GOLD COAST

—

Suite 21,
2 Eighth Avenue
Palm Beach QLD 4221

BRISBANE

—

Level 3,
240 Queen Street
Brisbane QLD 4000

02 9929 6974
equiries@willowtp.com.au
willowtreeplanning.com.au



WILLOWTREE
PLANNING

RESPONSE TO SUBMISSIONS REPORT

Proposed Extension to Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

DOCUMENT CONTROL TABLE

Document Reference:	SSD-17899480_Response to Submissions		
Contact:	Andrew Cowan		
Version and Date	Prepared by	Checked by	Approved by
Version No.1 - 08/07/2022	Stephanie Wu Senior Planner	Andrew Cowan Director	Andrew Cowan Director
Version No. 2 -	Stephanie Wu Senior Planner	Andrew Cowan Director	Andrew Cowan Director
Version No.3 -	Andrew Cowan Director	Andrew Cowan Director	Andrew Cowan Director

© 2022 Willowtree Planning Pty Ltd

This document contains material protected under copyright and intellectual property laws and is to be used only by and for the intended client. Any unauthorised reprint or use of this material beyond the purpose for which it was created is prohibited. No part of this work may be copied, reproduced or transmitted in any form or by any means, electronic or mechanical, including photocopying, recording, or by any information storage and retrieval system without express written permission from Willowtree Planning (NSW) Pty Ltd.



TABLE OF CONTENTS

TABLE OF CONTENTS	ii
FIGURES iii	
TABLES iii	
APPENDICES	iv
PART A PRELIMINARY	1
1.1 PROJECT OVERVIEW	1
1.2 APPLICATION PROCESS OVERVIEW	2
1.3 PURPOSE OF THIS REPORT	2
1.4 CHANGES TO THE PROPOSAL AS EXHIBITED	2
PART B SUMMARY OF SUBMISSIONS	4
2.1 SUBMISSIONS PROCESS	4
2.2 SUBMISSIONS RECEIVED	4
PART C RESPONSE TO SUBMISSIONS	5
3.1 RESPONSE TO AGENCY SUBMISSIONS	5
3.1.1 Assessment against Chapter 3 of Industry and Employment SEPP	42
3.2 RESPONSE TO PUBLIC AND OTHER STAKEHOLDER SUBMISSIONS	44
PART D SUMMARY OF CHANGES	47
4.1 PROJECT DESCRIPTION	47
4.2 BUILT FORM	48
4.2.1 Building Height	48
4.2.2 Signage	50
4.2.3 Potential Public Art	51
4.3 LANDSCAPE	51
4.3.1 Proposed tree planting	52
4.3.2 Level 1 Internal Courtyard and Hanging Garden	52
4.3.3 Associated landscaping	53
4.4 STORMWATER DRAINAGE	56
4.5 VISUAL IMPACT	56
PART E PROJECT JUSTIFICATION	57
5.1 JUSTIFICATION	57
5.1.1 Supports State, Regional and Local Planning Objectives	57
5.1.2 Demonstrates an Appropriate Use of a Permissible Development	57
5.1.3 Minimises Environmental Impacts	58
5.1.4 Creates Compatibility with Surrounding Development	58
5.1.5 Delivers Ecologically Sustainable Development	58
5.2 CONCLUSION	59
APPENDIX A SUBMISSIONS REGISTER	61
APPENDIX B UPDATED MITIGATION MEASURES	64



PLANNED MANAGEMENT AND MITIGATION MEASURES FOR THE PROPOSED DEVELOPMENT 65
APPENDIX C SUPPORTING INFORMATION..... 71

FIGURES

Figure 1 Aerial Map of current site configuration (Nearmap 2022) 28
Figure 2 East Elevation - Lytton Street View (Team 2 Architects 2022) 48
Figure 3 Shadow Diagrams on Winter Solstice (Team 2 Architects 2022) 49
Figure 4 Location of three pylon signs along the Lytton Street frontage (Team 2 Architects 2022) 50
Figure 5 Indicative design of proposed signage (Team 2 Architects 2022) 50
Figure 6 Opportunities for public and indigenous art (Team 2 Architects 2022) 51
Figure 7 Dubbo Hospital Car Park (Team 2 Architects 2022) 51
Figure 8 Proposed Tree Planting (Arcadia 2022)..... 52
Figure 9 Level 1 Internal Courtyard Masterplan (Arcadia 2022) 53
Figure 10 Level 1 Hanging Garden Section (Arcadia 2022)..... 53
Figure 11 Level 1 Inner Courtyard Landscape Design (Arcadia 2022)..... 54
Figure 12 Level 2 Courtyard Landscape Design (Arcadia 2022) 54
Figure 13 Level 3 Courtyard Landscape Design (Arcadia 2022) 55
Figure 14 Lytton Street Streetscape Design (Arcadia 2022) 55

TABLES

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS 5
TABLE 2 SEPP 64 ASSESSMENT 42
TABLE 3 RESPONSE TO PUBLIC SUBMISSION 45
TABLE 4 PROPOSED DEVELOPMENT PARTICULARS 47
TABLE 5 BUILDING HEIGHT REDUCTION..... 49
TABLE 6 PIPE LAYOUT..... 56



APPENDICES

Appendix A	Submissions Register
Appendix B	Updated Mitigation Measures
Appendix C	Supporting Information
Appendix C1	Updated Clause 4.6 Variation Request
Appendix C2	Updated Architectural Plans
Appendix C3	Updated Architectural Design Statement
Appendix C4	Updated Landscape Plans and Updated Landscape Strategy
Appendix C5	Updated Visual Impact Assessment
Appendix C6	Traffic Statement
Appendix C6a	Traffic Survey Results
Appendix C7	Stormwater Statement and Updated Stormwater Plans
Appendix C8	Updated Flood Impact Assessment
Appendix C9	Updated Noise and Vibration Impact Assessment
Appendix C10	Updated Aboricultural Development Impact Assessment Report
Appendix C10a	Biodiversity Development Assessment Report Review Letter
Appendix C11	Email correspondence with Council regarding tree removal
Appendix C11a	Council Tree Application
Appendix C12a	Letter of Support from Associate Professor John Kasinathan – Medical Director of Ramsay Northside Clinic
Appendix C12b	Letter of Support from Dr Mark Cross – Medical superintendent of Ramsay Clinic Wentworthville
Appendix C12c	Letter of Support from Natalie King – Chief Executive Officer of Ramsay Clinics Wentworthville and Macarthur
Appendix C12d	Media Release by National Association of Practising Psychiatrists



PART A PRELIMINARY

1.1 PROJECT OVERVIEW

Ramsay Health Care have extensive experience in health care services and is Australia's largest health care provider. Ramsay Health Care operates 72 private hospitals and day surgery units in Australia including mental health facilities as well as the operation of four public facilities. Ramsay Health Care admits more than one million patients annually and employs more than 31,000 people in Australia. In addition, Ramsay Health Care focuses on teaching and research, and places an emphasis on both undergraduate and postgraduate training of the future medical and nursing workforce.

The proposal includes the erection of a four-storey extension (being the 'Stage 2' building) to the existing Wentworthville Northside West Clinic, as well as alterations and additions to the existing 'Stage 1' building on Site. The proposed four-storey extension will be located south and west of the existing building above the existing at-grade carpark. The proposed extension would result in an additional Gross Floor Area (GFA) of 4,498m² with an addition of 46 carparking spaces. Specifically, the proposal entails the following:

- Demolition of the existing two-storey west wing building and carpark in the southern portion;
- Construction of a four-storey extension of the existing Wentworthville Northside West Clinic including two levels of patient area and two levels of parking on the western boundary and three storeys of patient area and one level of at grade carparking along the southern boundary, comprising:
 - Addition of 95 inpatient rooms and nine consulting suites across Levels 1 to 3
 - Provision of 18 carparking spaces on Lower Ground Level and 28 carparking spaces on Ground Level
- Alterations and additions to existing Stage 1 building comprising:
 - A new lobby, gym, loading bay, ancillary office and associated amenities on Lower Ground Level
 - A new lobby, art room and amenities on Ground Level
- Construction of a landscaped open space in the south western portion of the Site
- Tree removal in the southern and western portions of the Site

As part of the Response to Submissions package, the building height of the proposed health services facility has been reduced to 15.31m to 18.67m, representing to a variation of 2% to 24.5%. The landscape design of the proposed development has also been revised to enhance the landscape provision across various areas of the proposed facility. Further details of the numerical particulars are stipulated in **Section 1.4** and **Part D** of this RTS Report.

The Proposed development provides for the extension of the Wentworthville Northside West Clinic situated in a locality which has been identified to present opportunities for growth and development in jobs and housing under the LSPS. The Site comprises an existing health services facility which has been operated by Ramsay Health Care to offer high standards mental health care services and inpatient residential care in proximity to Wentworthville local centre. The proposal would provide additional capacity for the operation of the Clinic and continue to respond to the emerging demand for health care services in the locality.

Furthermore, the proposal would build on the health services and infrastructure currently provided by the Clinic to facilitate the orderly and economic use and development of the Site without resulting in any unacceptable economic, environmental or social impacts.



1.2 APPLICATION PROCESS OVERVIEW

Development consent is being sought for the proposed development, as State Significant Development (SSD), under Division 4.1, Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

In accordance with section 9 of the EP&A Act and the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), the Environmental Impact Statement (EIS) for the proposed development is required to be placed on exhibition for a minimum of 28 days.

The proposed development was exhibited from 4 February 2022 to 3 March 2022, during which a number of submissions were provided to the NSW Department of Planning and Environment (DPE), as discussed herein.

Submissions received by NSW DPE outside the exhibition period have also been addressed in this report.

1.3 PURPOSE OF THIS REPORT

The purpose of this Response to Submissions (RTS) Report is to detail and respond to matters raised in the submissions received for SSD-17899480.

The RTS report has been set out to address each submission matter, and is structured as follows:

PART A	provides an overview of the project, the application process and the RTS Report purpose and structure;
PART B	provides a detailed response table of the submissions received;
PART C	provides responses to each of the issues raised in submissions received;
PART D	provides a revised project description and addresses an additional environmental assessment requirements;
APPENDIX A	provides a summary of the submissions received;
APPENDIX B	provides a revised set of project management and mitigation measures, following the review of submissions and technical responses;
APPENDIX C	provides copies of any supporting information required by the received submissions.

1.4 CHANGES TO THE PROPOSAL AS EXHIBITED

Following the exhibition phase, and upon review of all submissions received, several amendments have been made to the proposed development. These amendments include:

- Decrease in maximum building height to 18.67m, resulting in a variation of 24.5% only
- Potential incorporation of public art through the erection of a major installation by local artists on a canvas nearly 3m wide by between 15-20m high, subject to further investigation at detailed design stage
- Removal of 40 existing inpatient rooms as part of the demolition of the existing west wing building, resulting in a balance of 30 rooms
- Removal of 17 car parking spaces in the southern portion of the Site
- Erection of three pylon signs along Lytton Street for wayfinding purposes
- Increase in tree planting from 7 to 13 trees
- Deletion of access to the internal courtyard on Level 1 from patient rooms. Instead, access will be provided via the lounge room and corridor
- Addition of planter walls, planting beds and timber seating to increase the provision of landscaping in the Level 1 internal courtyard



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension to Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

- Details of landscaping along the Lytton Street streetscape, in the Level 1 inner courtyard, Level 2 and Level 3 courtyards added to the Landscape Strategy and Landscape Plans at **Appendix C4**
- Tree 47 to be removed due to major encroachments to the Tree Protection Zone by the proposed construction and earthworks, subject to further investigation by means of root mapping to be undertaken to determine the extent of root development within the area of the existing carpark at the line of the proposed building
- Modification to the proposed new pit and pipe alignment as requested by Council to be entirely on the Subject Site. One additional pit has been added with the design pipe size remains unchanged



PART B SUMMARY OF SUBMISSIONS

2.1 SUBMISSIONS PROCESS

The proposed development was exhibited from 4 February 2022 to 3 March 2022, during which a number of submissions were provided to the NSW DPE.

Clause 82 of the EP&A Regulation permits the Planning Secretary of the NSW DPE to request that the Applicant to provide a written response in relation to the issues raised within any submissions made during public exhibition. This RTS Report aims to fulfil the request from the Planning Secretary.

Submissions received by NSW DPE outside the exhibition period have also been addressed in this report.

2.2 SUBMISSIONS RECEIVED

A total of 11 submissions were received during the exhibition period, with eight submissions from government agencies and three public submissions, as summarised below:

Public authorities:

- NSW DPE
- Cumberland City Council
- DPE Water
- Environment, Energy and Science (EES)
- Heritage NSW
- Endeavour Energy
- Sydney Water
- Transport for NSW (TfNSW)
- Endeavour Energy

General public:

- Name withheld - Wentworthville
- Lakshmi Balachandran - Wentworthville
- Name withheld - Merrylands



PART C RESPONSE TO SUBMISSIONS

3.1 RESPONSE TO AGENCY SUBMISSIONS

This section seeks to tabulate all submissions received from government agencies and provide a detailed response to each matter.

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
Agency Submission			
DPE	Built Form and Height	The height of the proposed building is considered excessive and the proposal in its current form is considered an overdevelopment of the site given the surrounding residential context. Consideration is to be given to ways of reducing the bulk and scale of the proposed development, particularly given that it fails to comply with the height and FSR development controls in CLEP 2021.	<p>As demonstrated in the updated Architectural Plans (Appendix C2), the height of the proposed building has been reduced to RL37.787 along the Lytton Street elevation. The proposed variation to height has been reduced to 0.31m to 3.67m, representing approximately 2% to 24.5%.</p> <p>The proposed development as modified is considered to present a well-resolved built form which is sympathetic to the low-density residential character of the surrounding area. The reduction in building height will facilitate a more sensible transition in height to the surrounding residential properties whilst maintaining adequate building separation to preserve the amenity of the surrounding dwellings. Further details of the proposed building height are discussed in revised Clause 4.6 Variation Request at Appendix C1.</p>
		Demonstrate how the undercroft landscaped area will receive adequate solar access as well as appropriate passive surveillance considering there are limited active use rooms with windows on the ground floor facing this part of the development.	<p>As demonstrated in the Courtyard Shadow Diagrams within the Architectural Plans, the courtyard will receive adequate sunlight between 9am and 3pm on winter solstice. There will only be minor overshadowing from the building columns and the staircase, which is not considered to adversely impact on the sunlight access of the courtyard.</p> <p>In relation to passive surveillance, it is noted that the proposed courtyard will be located on ground level fronting Lytton Street Park to the west, facilitating the visual connection with the</p>



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
			<p>adjoining green space. Landscaping will also be provided around the security fence to enhance the visual interest of the courtyard when viewed from the adjoining open space. Additionally, the courtyard will be overlooked by the ward rooms on Level 1 and Level 2 with windows facing this part of the development.</p> <p>This area will be predominantly used for either supervised group sessions which will be managed by staff or by low risk patients with permission to use the area. The area is directly linked to the existing dining courtyard (to be new outdoor gym space in the proposed development) and as such is considered to be in acceptable proximity to other patients and staff.</p>
		<p>Provide further justification for the proposed limited building setbacks or alternatively provide increased setbacks to improve the transition and interaction between the development and the public reserve.</p>	<p>The proposed development exhibits a variable setback of 0-6m. It is noted that the variable setback is due to the irregular shape of the Site and the design requirements of the western carpark. The western building has been designed to maximise the provision of carparking on the Lower Ground and Ground Levels whilst ensuring compliance with the turning paths and vehicular access requirements. By providing the western carpark in its proposed form, this would negate the need to provide carparking along the Lytton Street frontage, which would impact on the visual quality of the building when viewed from Lytton Street.</p> <p>Further, existing tree canopy and new landscaping in the western setback area to provide visual relief for the proposed built form and facilitate the visual connection between proposed development and the adjoining open space.</p>
		<p>Provide further detail as to why level changes between Stage 1 and Stage 2 cannot be accommodated to reduce the overall building height, in particular:</p> <ul style="list-style-type: none"> ▪ further explanation as to why including ramps/stairs between Stage 1 and Stage 2 to reduce the overall 	<p>It is noted that the proposed development has been designed to allow two units to connect together and increase, or decrease, in size by the locking of the compartmented areas. This would enable two connected units to open and close doors to allow for</p>



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		height would require the facility to be operated separately.	<p>decreasing and increasing sizes of units, based on specific clinical demand.</p> <p>Further, having units that can change in size would ensure that if there is higher demand for one service, there is the ability to meet that demand without turning mental health patients away. The existing unit in Stage 1 where Stage 2 is proposed to connect, already has demand that exceeds the size of the unit.</p> <p>In addition, it is not appropriate, nor safe, for the cohorts of patients at the hospital to mix, form example mixing with over 18s, or young vulnerable eating disorder patients with drug and alcohol patients. It is noted that mental health needs have drastically increased during the two years of pandemic and the proposed development has been designed to facilitate flexibility and provide clinically response service. Therefore, the connection between the two Stages of the development on the same level is critical and necessary for the operation of the Site as a mental health facility.</p> <p>Additionally, as demonstrated in the Architectural Design Statement (Appendix C3), the Australasian Health Facility Guidelines (AHFG's) states that changes of level within a clinical facility of less than a storey is considered poor practice and should be avoided wherever possible. The main reasons relate to patient movements of beds and trolleys etc. It is noted that achieving a 1m level change between the Stage 1 and Stage 2 buildings would require 10 rooms to be decommissioned due to the need for a ramp within the corridor of one or other of the stages. It is therefore not practical to incorporate level changes within a floor plate.</p>



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		<ul style="list-style-type: none"> a detailed DDA compliance report and fire egress paths for both the proposed development and for a height compliant development, comparing and detailing justifications. 	<p>It is noted that the proposed development has been revised to reduce the variation to the building height limit as previously addressed. Therefore the requirement for a DDA compliance and fire egress paths for a height compliant development would be redundant. Further, as discussed above, significant reductions and redesign would be required for a height compliant development, which would render the building operationally unfeasible to meet the mental health needs of the community in a safe and effective way.</p>
		<ul style="list-style-type: none"> architectural plans depict Stage 1 only adjoining the proposal in two locations - one door along the southern façade of Stage 1 and a section along the western façade, which includes stairs internally altering the floor layout and accommodating a level change. 	<p>The Architectural Plans clearly depict the central lift core which also connects the new development to the existing building.</p> <p>The stairs near the western façade are required as the existing consulting suites are at a different level than the Stage 1 RL. It is not critical for there to be 'swing' or direct connection at this western end as this is where the inpatient rooms are located adjacent to consulting suites and the two areas can operate in isolation.</p>
		<ul style="list-style-type: none"> the external façade alignment is inconsistent with Stage 1 and does not appear to be seamless. 	<p>As demonstrated in the Elevations and renders within the Architectural Plans, the building elevations have been revised to provide a consistent façade with the existing Stage 1 building in order to keep a similar look and feel across the development.</p>
		Provide consideration of opening the western boundary ground level carpark to the landscaped areas through the removal of the screening.	<p>It is noted that screening is required along the western boundary of the carpark to maintain security and prevent access from the carpark through to the rear of the facility and vice versa.</p>
		Provide section plans of the west block.	<p>A section of the western building is provided in DA3001 within the Architectural Plans as Section D-D.</p>
		Provide natural ground RLs on all section plans below each maximum height to enable appropriate calculation of the overall exceedances.	<p>Natural ground RLs have been added to all section plans indicating the revised building height.</p>



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		<p>Address and detail matters requested by GA NSW as part of State Design Review Panels (SDRP) 1 and 2, within the architectural plans and design reports, specifically:</p> <ul style="list-style-type: none"> ▪ reduce the building height and be sympathetic to the reserve behind as substantial overshadowing is expected during winter. 	<p>As demonstrated in the Architectural Plans, the building height has been reduced to a maximum of 18.67m, representing a variation of 24.5%. As illustrated in the Shadow Diagrams, the proposed development will maintain three hours of unobstructed sunlight access for Lytton Street Park between 12pm and 3pm.</p>
		<ul style="list-style-type: none"> ▪ clearly demonstrate how response to country has been addressed within the Architectural Design Statement and has responded to commentary from SDRP 1 and 2. 	<p>The architectural and landscape design has been carefully considered to incorporate a number of significant pieces of public art, both at a tactile level in the landscaped paths and planting, and in the building where each of the three staircases offer the possibility of a major installation by local artists on a canvas nearly 3m wide by between 15m and 20m high.</p> <p>Response to commentary from SDRP 1 and 2 is provided in the Architectural Design Statement at Appendix C3.</p>
		<ul style="list-style-type: none"> ▪ redesign the internal courtyard to: <ul style="list-style-type: none"> ○ include more landscaping and restrict access from patient rooms, ensuring increased privacy and improved amenity. 	<p>As demonstrated in the Landscape Plans and Landscape Strategy (Appendix C4), landscaping has been maximised in the internal courtyard which includes planting beds, a hanging garden, planter wall and timber seating, the generic design details of which are contained in the Architectural Plans. The layout of Level 1 has been revised to remove access to internal courtyard from patient rooms. Instead, the internal courtyard will be accessible from the lounge room and corridor.</p>
		<ul style="list-style-type: none"> ○ confirm the roof treatment of the courtyard as hand sketches demonstrate a glazed roof - enclosing the space is not supported. 	<p>No roof treatment to the Level 1 courtyard is proposed. The sketch depicting the section through the courtyard in the Architectural Design Statement is indicating structure for the hanging plants only.</p>
		<ul style="list-style-type: none"> ○ demonstrate the overshadowing which would be created by the hanging planters, ensuring adequate solar access is experienced within this space and to internal rooms. 	<p>As illustrated in the Shadow Diagrams within the Architectural Plans, the courtyard and patient rooms will receive adequate solar access during summer solstice. It is noted that the patient rooms on Level 1 and 2 will continue to receive acceptable level of sunlight access on winter solstice. While the courtyard will be</p>



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
			largely overshadowed during winter solstice, the planting species for the courtyard and hanging garden have been carefully selected by Arcadia. These species do not require a high level of sunlight access and are suited to the shaded environment. Further details are provided in the Planting Schedule in the Landscape Plans and Landscape Strategy.
		<ul style="list-style-type: none"> incorporate ramps/stairs internally to enable a reduction to the overall roof height and enable compliance with the 15m height limit. 	<p>It is noted that the roof height has been reduced to minimise the exceedance of the 15m building height limit. As demonstrated in the LEP Height Diagrams in the Architectural Plans, the building will only exceed the 15m height limit by approximately 907mm, presenting a variation of 2% on the Lytton Street elevation.</p> <p>Further, as demonstrated above and in the Architectural Design Statement, addition of ramps would impact on the operation and functionality of the existing ward and would require 10 rooms to be decommissioned to accommodate the ramp.</p>
		<ul style="list-style-type: none"> include detail of the screen to the undercroft within elevations as detailed within the architecture design statement. 	Screening of the undercroft area have been demonstrated on the Elevations within the Architectural Plans.
		Redesign the lower ground car parking to ensure that the swept paths are free from obstructions.	Swept paths on the lower ground car park have been illustrated in the Architectural Plans.
		Provide details of wayfinding signage to ensure pedestrian access to the building is clear and easy to identify.	Three pylon signs will be provided along Lytton Street to indicate pedestrian access point to the building. Details of the proposed signage are provided in the Architectural Plans. An assessment against the relevant provisions under Chapter 3 of the <i>State Environmental Planning Policy (Industry and Employment) 2021</i> (Industry and Employment SEPP) is provided in Section 3.1.1 .
		Provide details of where staff/visitors are expected to park during construction, noting that overall site parking is reduced by half as the southern car park will be fenced off and only the northern carpark (capacity of approximately 31 spaces) will be operating. If relying on existing on-street parking to	Staff/visitors will be encouraged to utilise public transport including the Wentworthville train station and bus services to access the facility. Carpooling will also be encouraged for employees, with the on-site parking to be prioritised for employees who carpool to minimise the impact on the surrounding streets. Further details will be subject to the detailed



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
 23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		accommodate shortfall, provide confirmation that existing capacity exists on surrounding streets.	<p>Construction Traffic Management Plan and the appointment of a builder prior to the commencement of construction. The traffic survey conducted on 10 August 2022 notes the following with respect to construction traffic:</p> <p><i>....there is an abundance of unoccupied parking spaces within the vicinity of the site. At a minimum there is 118 vacant parking spaces at 10am, and an average of 124 parking spaces available across the entire day. As such, there is sufficient free on-street capacity to accommodate the short-term parking impacts (approximately 31 spaces) associated with construction.</i></p> <p>The parking survey was conducted on 10 August 2022 which notes the following regarding the shortfall of 4 spaces:</p> <p><i>..... At a minimum there is 118 vacant parking spaces at 10am, and an average of 124 parking spaces available across the entire day. As such, there is sufficient free on-street capacity to accommodate the four (4) parking space shortfall associated with the proposed clinic expansion. It is also noteworthy, that a site-specific Green Travel Plan could potentially reduce private car usage generally, and as such, the continual support is provided for the proposal.</i></p> <p>Refer to Appendix C6a for further details.</p>
		Detail on the architectural plans the location and number of photovoltaics proposed for the development.	Detail is provided on plan 903-DA0105-overall site plan-10 within the Architectural Plans.
	Noise	Update the Noise and Vibration Impact Assessment to include the predicted noise levels for receiver 1 within the noise assessment tables, confirming that the receiver closest to the subject site will not be significantly impacted during	The Noise and Vibration Impact Assessment (Appendix C9) has been updated to include predicted noise levels for Receiver 1 in the noise assessment tables for construction stage.



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		<p>construction. If significant impacts are identified, then appropriate mitigation measures are to be proposed to reduce the level of impact.</p>	<p>The construction noise assessment shows that with the hoarding around the construction site, the 30-tonne excavator, excavator with rock breaker and demolition saw are expected to exceed the noise management level (NML) at close distances for residential receiver 4. The NML of all the nearest residential receivers is also predicted to be exceeded with all plant activities running cumulatively at close distances. Further, with the hoarding around the construction site, all earthworks activities, except the truck, are predicted to exceed the NML at close distances for residential receiver 4. The NML of all the nearest residential receivers is predicted to be exceeded with all plant activities running cumulatively at close distances.</p> <p>The predicted exceedance of the NMLs in the nearest residential receivers would be suitably managed through the implementation of appropriate mitigation measures outlined in Section 7.4 of the Noise and Vibration Impact Assessment.</p>
		<p>Provide details of the anticipated noise generated from the proposed upper level outdoor courtyards, as identified by Council.</p>	<p>An assessment of the noise generated by the outdoor courtyard on Level 3 is provided in Section 5.5 of the Noise and Vibration Impact Assessment. The predicted noise level from the users to the nearest residential receiver associated with the use of the outdoor courtyard is 50 dB(A). The predicted noise levels indicate compliance is achieved for the day and evening time periods at the nearest noise sensitive receiver as long as no more than 30 users are speaking in normal voices on the outdoor balcony at any time. Further details are provided within the Noise and Vibration Impact Assessment.</p> <p>It is noted that the courtyard on Level 3 will incorporate full height glazing with a roof and hence it is not anticipated that the Level 3 courtyard would result in any adverse acoustic impacts.</p>



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
	Stormwater and Flooding	<p>Address EES Group advice in relation to amending the flood impact statement, particularly:</p> <ul style="list-style-type: none"> consider the flood risk from the full range of floods up to the probable maximum flood for mainstream and overland flooding. 	<p>The Flood Impact Statement (Appendix C8) has been updated to further consider the flood risks. It is noted that the Site is only affected by overland flow of a short duration, not mainstream flooding of Finlaysons Creek. Flow depths are predominantly less than 100mm on the Site, and flood hazard does not change from pre-development to post-development conditions. Refuge in short duration, overland flow events can be found in upper levels of the development.</p> <p>The hazard category on the Site is Low in all simulated flood events up to the PMF for post-development conditions. Overland flow poses a Low Hazard to people, vehicles and building infrastructure under pre-development and post-development conditions at the Site.</p> <p>Further details are provided in the Flood Impact Statement.</p>
		<ul style="list-style-type: none"> refer the flood strategy to SES for comment. 	<p>The flood strategy has been sent to the SES for confirmation. Feedback is currently pending.</p>
		<ul style="list-style-type: none"> utilise the 0.5 per cent and 0.2 per cent AEP flood events as proxies for assessing sensitivity to an increase in rainfall intensity of flood producing rainfall events due to climate change. 	<p>The 0.5% AEP and 0.2% AEP events have been simulated as proxies for assessing sensitivity to an increase in rainfall intensity due to climate change.</p> <p>The results presented in the flood maps show isolated afflux at the southern side of the building for the 0.5% AEP, 0.2% AEP and PMF events, which will be mitigated through the provision of a concrete bunding for the southern driveway ramp area around existing doors to ensure smooth connection to existing pavement to allow for trolley access.</p> <p>There are small areas of afflux on the eastern and southern side of the proposed raised area on the southern side of the building, which is contained within the site area and does not pose an</p>



TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
			increased risk to life or property. The area of 'was dry, now wet' at the southern west of the site (offsite) is within the Finlayson Reserve and does not pose a risk to life or property. There is a small area of afflux at the western end of the carpark at the northern end of the site, which is predominantly within the site area and is of Low flood hazard, and does not pose a risk to life or property. Further discussion is provided in Section 5.1 of the Flood Impact Assessment.
		<ul style="list-style-type: none"> increased flood risk from climate change and rare to extreme flooding is to be further detailed to ensure no risk to life and property. 	As demonstrated above, the 1% AEP and floods up to the PMF produced low hazard categories throughout the entire Site. Minor flood impacts are identified external to the Site and are on Council drainage reserve, and do not pose a risk to life or property. The increase in flood levels identified is limited to within the Site, and are mitigated as presented in the Flood Impact Assessment.
		Address Council concerns in relation to stormwater matters, providing appropriate documentary evidence of easements and flood impacts on surrounding properties.	A Stormwater Statement has been prepared by Stellen Consulting in response to Council's comments. Further details of the response are provided within this Table and in the letter at Appendix C7 .
	Biodiversity and Landscaping	Address and detail matters requested by GA NSW as part of State Design Review Panels (SDRP) 1 and 2 within the architectural and landscape plans and design reports, specifically: <ul style="list-style-type: none"> provide detail of all landscaped areas, particularly the terraces across all floors of the development (Levels 2 and 3 in particular), demonstrating areas for passive activities and improved amenity. 	Details of all landscape areas, including the courtyards on Level 2 and 3 have been provided in the Landscape Strategy and Landscape Plans (Appendix C4).
		<ul style="list-style-type: none"> redesign courtyard 1 to ensure a more permanent and integrated landscaped space. 	The Level 1 courtyard design has been revised to provide planter wall integrated with timber seating, as well as additional planting bed provision. In addition, the planting species for the courtyard and hanging garden have been selected to suit the shaded environment within the building. The exposure information of the proposed planting species has been provided within the



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
			Landscape Strategy, indicating the selected species will be able to survive in the Level 1 courtyard.
		<ul style="list-style-type: none"> identify the total percentage of tree canopy and green space within the site excluding trees located outside of the subject site on surrounding properties. 	<p>For clarity, calculation of the 30% tree canopy includes the canopy that is within the site boundary from trees outside of the boundary. The portion of the canopy that is outside the site boundary is excluded from the calculation.</p> <p>For consistency and completeness, tree canopy excluding all canopy from trees outside of the site boundary is 27%.</p>
		<ul style="list-style-type: none"> provide detail within the landscape strategy and architectural plans of the green walls and herb gardens as detailed within the Architectural Design Statement. 	No green walls or herb gardens are proposed as part of the proposal. Reference to green walls and herb gardens have been removed in the Architectural Design Statement.
		Include details of landscaping along Lytton Street providing improved amenity for the public ensuring visibility and appropriate sightlines are maintained as well as improved landscaping to soften the streetscape and utility rooms on ground floor. In addressing Council's detailed comments relating to fencing, confirm the fencing strategy and ensure consistency across all documents detailing the fencing design (i.e. detailed on all photomontages and architectural plans).	<p>Details of the Landscaping along Lytton Street are provided in the Landscape Plans and Strategy. Specifically, the landscaping along the Lytton Street streetscape includes proposed planting beds and trees which will soften the streetscape and built form on ground level whilst maintaining appropriate sightlines and visibility.</p> <p>As illustrated in the Architectural Plans, 2.1m black palisade fencing will be provided around the site boundaries in accordance with Council's comment. Landscaping will be planted around the security fence. Fencing design will be confirmed in detailed design phase, noting comments from the SDRP and further workshop with Ramsay Health Care.</p>
EES	Biodiversity	EES is satisfied that the Biodiversity Development Assessment Report (BDAR) prepared by EcoLogical Australia dated 15 November adequately assesses biodiversity values and impacts associated with the proposed development.	Noted. The proposed tree removal will be undertaken in accordance with EES's comments. It is noted also per Appendix C10a there are no changes to the findings of the original BDAR.



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		<p>Table 9 of the BDAR recommends biodiversity mitigation and management measures to be implemented during various stages of the proposal. EES support the implementation of these measures which should be reinforced through conditions of approval for the proposal.</p> <p>Given the potential for protected fauna to utilise the trees proposed for removal as habitat, an experienced and qualified ecologist is to be present during any tree removal to re-locate any displaced fauna that may be disturbed during this activity.</p> <p>All non-habitat vegetation should be cleared first to allow appropriate space for the felling of habitat trees and retrieval of any fauna that may be present within habitat trees.</p> <p>Trees with hollows shall be lopped in such a way that the risk of injury or mortality to fauna is minimised, such as top-down lopping, with lopped sections gently lowered to the ground, or by lowering whole trees to the ground with the “grab” attachment of a machine.</p> <p>Any injured fauna is to be appropriately cared for and released on site when re-habilitated. Injured fauna is to be placed into the hands of a wildlife carer (please note only appropriately vaccinated personnel are to handle bats).</p>	
	Impact to Trees	<p>In addition to the biodiversity impacts considered in the BDAR, the impacts to individual trees are further considered in the Arboricultural Impact Assessment prepared by Bird Tree Consulting (the arborist report). The arborist report identifies 30 trees requiring removal which is consistent with the assessment of impacts in the BDAR. However, the following additional impacts are identified and need to be further addressed:</p> <ul style="list-style-type: none"> Tree 47, Eucalyptus microcorys, is located within an adjoining property and is subject to major tree 	<p>As demonstrated in the updated Aboricultural Development Impact Assessment Report (Appendix C10), the Tree Protection Zone (TPZ) of Tree 47 is encroached by the proposed construction and required earthworks by major encroachment as defined by AS4970- 2009.</p> <p>This tree will not be viable to be retained based on this encroachment, however this tree is located on the adjacent</p>



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		<p>protection zone (TPZ) encroachment. The arborist report recommends root mapping be undertaken to determine the extent of impacts to existing roots from this tree within the subject site. The outcome of this investigation will determine if the tree can remain viable under the current proposal or if amendments are required to the construction footprint or landscape design to avoid any unsustainable impacts.</p>	<p>property. Further investigation by means of root mapping is required to determine the extent of root development within the area of the existing carpark at the line of the proposed building.</p> <p>It is requested that the root mapping be incorporated as a condition of consent so that it can be addressed with Cumberland City Council in coordination with the required stormwater design approvals which will also be a condition of consent.</p> <p>Consultation with Council's Senior Tree Management Officer on 8 July 2022 was undertaken and confirmed that based on their review of the Arboricultural Impact Assessment, removal of Tree 47 is supported given that the tree will be impacted by the development and is proven to be in poor health. Further details of the consultation are provided in the email correspondence with Council at Appendix C11. It is noted that a tree application to remove this tree was lodged with Council on 15 August 2022 and is currently under assessment (refer Appendix C11a).</p>
		<ul style="list-style-type: none"> Trees 41, 48 and 49 are also subject to major encroachment into their TPZ. Further root investigations have not been recommended for these trees. Australia Standards for the Protection of trees on development sites (AS4970:2009) states that the project arborist must demonstrate that trees with a major encroachment will remain viable. The arborist report has not provided adequate justification to demonstrate this. EES recommends further root investigations be undertaken for these trees in accordance with the recommendations of AS4970:2009. 	<p>The proposed building line will impact on the canopies of 41, 47, 48 and 49 and will require canopy reduction pruning of these trees. Trees 41, 48 and 49 will require less than 10% of the canopy to be reduced.</p> <p>The TPZ of Tree 41, 48 and 49 in accordance with AS 4970-2009 Protection of Trees on Development Sites will be encroached by the proposed development by 18%, 15% and 13% respectively which is slightly greater than the minor encroachment as defined by AS 4970-2009. Based on consideration of existing structures and this species' tolerance to root disturbance in accordance with clause 3.3.4 of AS 4970-2009. These trees will be viable to be retained under the proposed development in accordance with</p>



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
			the pre-construction tree protection measures outlined in Section 8.0 of the Aboricultural Development Impact Assessment Report.
		<ul style="list-style-type: none"> Tree 41 also requires canopy reduction of approximately 20%. The cumulative impact of proposed canopy reduction and TPZ incursions/root loss should be further addressed by the project arborist. 	Tree 41 has a bark inclusion within the primary junction which places this tree at increased risk of failure at this point. In consideration of the future development and the increased number of targets and therefore increased hazard posed, it is recommended by Birds Tree Consultancy that a Level 2 (TRAQ) Risk Assessment be carried out on this tree to determine the level of risk and viability of the tree for retention. It is nominated for retention however until such time as proven otherwise.
		<ul style="list-style-type: none"> The impacts of a proposed new substation within proximity to trees numbered 16, 17, 18, 20 and 53 does not appear to have been considered. The impacts to these trees from the substation should be addressed. 	<p>The Aboricultural Development Impact Assessment Report has been updated to reassess the impacts to Trees 16, 17, 18, 20 and 53.</p> <p>Tree 16 will be encroached by the required stormwater works of the proposed development by 8% which is a minor encroachment as defined by AS 4970-2009. This tree will be viable to be retained under the proposed development.</p> <p>The TPZ for Trees 17, 18, 20 and 53 will be totally encroached by the proposed development and hence these trees will not be viable to be retained under the proposed development.</p> <p>Further details are provided in the updated Aboricultural Development Impact Assessment Report.</p>
		<ul style="list-style-type: none"> Seven trees are proposed within the new landscape design, 3 of which are exotic, dwarf species. Given 30 trees are proposed for removal, the opportunity to incorporate additional tree planting into the landscape design should be investigated. 	As demonstrated in the Landscape Strategy, the proposed landscape design has been revised to provide additional tree planting with a total of 13 trees and a total tree canopy of 30% (including the canopy from trees outside of site boundary). The planting species selected for ground level are stipulated in the Landscape Strategy and Plans.



TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
	Flooding	<p>The following comments are provided in relation to flooding and the flood impact statement prepared by ACOR consultants:</p> <ul style="list-style-type: none"> The flood assessment should be amended to consider the flood risk from the full range of floods up to the probable maximum flood for both mainstream and overland flooding. 	<p>As demonstrated above, the Flood Impact Assessment has been updated to consider the full range of flood risks up to the PMF.</p> <p>The site is only affected by overland flow of a short duration, not mainstream flooding of Finlaysons Creek. Flow depths are predominantly less than 100 mm on the site, and flood hazard does not change from pre-development to post-development conditions.</p> <p>Refuge in short duration, overland flow events can be found in upper levels of the development.</p> <p>Further details of the flood assessment are provided in Section 4 of the Flood Impact Assessment.</p>
		<ul style="list-style-type: none"> Shelter in place has been put forward as a solution in times of rare flooding. However, this is a matter for the NSW SES as the responsible flood combat agency. This strategy should be referred to the NSW SES for comment. Flood education, awareness and emergency management plans for occupiers and visitors should also be prepared and referred to the NSW SES for comment. 	<p>It is noted that overland flow mitigation is proposed for the southern driveway ramp area, which is subject to overland flow under the pre-development conditions.</p> <p>A 150mm high concrete bunding around existing doors will be provided in the southern driveway ramp area to ensure smooth connection to existing pavement to allow trolley access.</p> <p>The proposed hospital building provides multiple levels above the ground level where evacuation can be facilitated. Floor levels of 27.50 m AHD are available on the first floor of the dwelling, which would provide adequate shelter in place scenarios for existing and the proposed buildings.</p> <p>Upper floor levels within the existing and the proposed building can provide safe refuge during the rarer events such as PMF flooding. The proposed lifts and access stairs to upper levels will provide reliable evacuation routes during such flood events.</p>



TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		<ul style="list-style-type: none"> EES recommends using the 0.5% and 0.2% AEP year flood events as proxies for assessing sensitivity to an increase in rainfall intensity of flood producing rainfall events due to climate change. 	As demonstrated above, the 0.5% AEP and 0.2% AEP events have been simulated as proxies for assessing sensitivity to an increase in rainfall intensity due to climate change. Further discussion is provided in Section 5.1 of the Flood Impact Assessment.
		<ul style="list-style-type: none"> The Flood Impact Study refers to the carparks and proposed safeguards to mitigate the 1% AEP flood, however, the increased flood risk from climate change and rare to extreme flooding is not clear and may pose a risk to life and property. 	As demonstrated above, the 1% AEP and floods up to the PMF produced low hazard categories throughout the entire Site. Minor flood impacts are identified external to the Site and are on Council drainage reserve, and do not pose a risk to life or property. The increase in flood levels identified is limited to within the Site, and are mitigated as presented in the Flood Impact Assessment.
City of Cumberland Council	Development Standards	<p>1. Council objects to the breach proposed for both of the building height and floor space ratio (FSR) controls. The proposed development is seeking to contravene the Cumberland Local Environmental Plan (CLEP) 2021 development standards for building height by 30.7% and FSR by 9.45%. The proposed exceedance in building height control includes habitable area that will increase overshadowing impact to Lytton Street Park towards the western and southern sides of the site. The variation proposed on the FSR control indicates bulk and scale that is inappropriate for the existing locality that is comprising of a higher residential density R4 zoning towards the northern part of the site and a lower residential density R2 zoning towards the eastern and southern sides of the site. The proposed contravention of the development standards will set undesirable precedence on the building height and FSR within the existing streetscape. The development fails to positively contribute to the character of the area and fails to replicate positive features of surrounding development. The proposed building is imposing, is greater in scale than the neighbouring development, and results in an inappropriate balance between the built and natural forms. For these reasons, clause 4.6 submitted with the application is not considered satisfactory, as the proposed development will</p>	<p>In response to Council's comments, the proposed building height has been reduced to a maximum of 18.67m, representing a variation of 24.5%. It is noted that Lytton Street Park will continue to receive a minimum of three hours of natural sunlight on winter solstice. It is noted that the footpath to the south of the Site will generally be overshadowed between 9am to 3pm on winter solstice with no overshadowing on summer solstice. Given this area comprises a footpath and used primarily as a path of travel to move through the open space area, the extent of overshadowing in mid-winter is considered acceptable and unavoidable. A compliant scheme would generate similar impacts.</p> <p>Further, it is noted that the proposed floor space is necessary for Ramsay Health Care to accommodate the additional beds and operate a flexible and clinically effective service. As demonstrated in the Letters of Support (Appendix C12) prepared by Ramsay Clinic Wentworthville, mental health needs have drastically increased during the past two years of pandemic, with a 26% increase in anxiety and depression rates since 2019. If the floor space were to decrease to a compliant scenario, it would significantly impact Ramsay's ability to adequately cater to the</p>



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
 23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

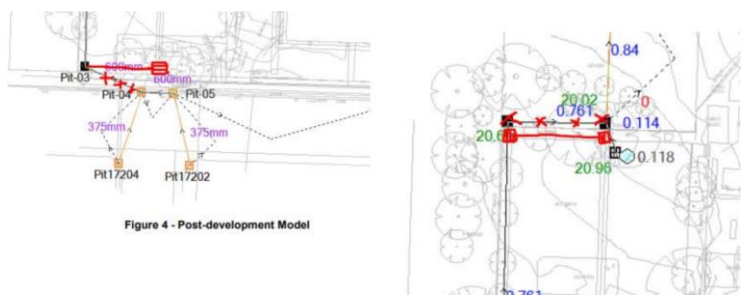
TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		<p>not be in the public interest because it is inconsistent with the objectives of the particular standard and the objectives for development within the zone in which the development is proposed to be carried out.</p> <p>The pathway for amending initial planning proposal approved on the site to accommodate the extent of the current and future development should have been pursued first.</p>	<p>emerging mental health needs of the local community and the wider Western Sydney, noting that there is currently no dedicated private adolescent mental health unit in Western Sydney for ages 14-17 years.</p> <p>The proposed development is consistent with the residential character of the surrounding area, in that the proposed building is adequately separated from the surrounding residential properties and that adjoining dwellings will continue to receive adequate solar access. In particular, the existing dwelling to the south will be located at least 21m from the ground level of the proposed Stage 2 building and will be separated by pedestrian access to Lytton Street Park.</p> <p>In addition, the proposed floor space is considered to present an appropriate development density. It is noted that the proposal presents a unique scenario where a mental health facility is situated within a residential area and the proposed additional floor space will be used purely for health services facility purposes, catering to the emerging mental health needs of the local community. It should also be noted that the density of the locality is envisaged to increase, considering the 1.2:1 FSR control applicable to a number of properties at the corner of Lytton Street and Veron Street and properties directly to the north of the Site with a maximum FSR of 1:1. The proposed 9.45% FSR variation is therefore considered to be complementary to the development intensity envisaged for the Wentworthville locality.</p> <p>It is noted that the proposed development seeks to increase the number of beds required to service the mental health needs of Western Sydney and provide high standards of specialist and clinical health services for the patient cohorts. Therefore, the</p>



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
			<p>proposed development is considered to deliver significant public benefits to the community and the wider Western Sydney.</p> <p>Further justification is provided in the revised Clause 4.6 Variation Request at Appendix C1.</p>
	Land Use	2. Clarification is required whether the proposed use of café and gymnasium will be ancillary to the principal existing use on the site.	The café and gymnasium will be ancillary to the primary use of the site as a health services facility. The café and gymnasium are for internal staff, patient and day programme use only.
	Council Pipeline/Easement	<p>3. The proposed works will interfere with the existing sewer pits and sewer mains. The following matters need to be resolved prior to the determination of this application.</p> <p>a) Separate approval shall be obtained for the storm water deviation design and construction works. Proposed realignment shall be located within the subject site. In this regard design may need to be modified during the above stormwater approval as follows:</p>  <p>Figure 4 - Post-development Model</p>	<p>The new pit and pipe alignment has been modified as suggested to be entirely on the subject property. One additional pit has been added and the design pipe size remains unchanged. The kiosk substation position has been adjusted to accommodate this. Refer to drawing PI70829-DR-101-2 and DRAINS results, proving feasibility.</p> <p>It is recommended that the requirement for a Section 68 approval for the detailed diversion design and connection is conditioned if required.</p>
		b) No building or structures are permitted over the Council's stormwater pipe and/or associated easements. This has not been demonstrated.	The building is clear of the pipe for a height of 7m above the ground, a sufficient working space for a backhoe or small excavator for pipe maintenance or replacement.



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
			A typical backhoe requires only 4-5m for normal working. A Caterpillar 420F2 has a maximum vertical working reach of approximately 5.6m.
	Flooding	4. An updated current flood advice letter shall be obtained from Council. The flood advice letter used in the stormwater report is not a valid one. The flood report shall also ensure current flood advice letter used in the flood report. Details shall be incorporated in the report and flood report shall be updated.	An updated flood advice letter dated 31 May 2022 has been received from Council. The Flood Impact Assessment has been updated accordingly.
	Stormwater Management	5. Onsite stormwater detention shall be provided for entire site. In this regard, <ul style="list-style-type: none"> i. stormwater plans shall clearly show the contributing catchments to the OSD system. As built OSD details and calculations shall be submitted. ii. OSD for the area that is located outside the contributing catchment shall be provided. Detail calculations shall be provided. iii. OSD shall comply with Council's DCP and Upper Parramatta River Catchment Trust "On-Site Detention Handbook". 	<p>The approved and constructed Stage 1 OSD allowed for only 884m² of the existing roof to detention of the entire site. Refer attached drawing 2014-0241 H01/B by AJW dated 17/9/14 outlining the total impervious area originally designed for (approximately 5405m² or 81% of the site), and the total proposed impervious area (5455 or 82% of the site). In accordance with Cumberland Council OSD Policy (s4.8), the approved detention strategy excluded portions of the property subject to overland flow (as known at the time of design).</p> <p>This proportion has increased with further modelling and now includes significant portions of both the original Stage 1 area and all of the Stage 2 (current proposal) area.</p> <p>The current proposal area is therefore excluded from the OSD policy in the same way it was excluded in the Stage 1 design.</p> <p>This is sensible policy because detention tanks in such low positions in the catchment not only fill with overland flow, becoming redundant when they are needed most, but also serve to compound the site discharge with the broader catchment peak flows.</p>



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
			Notwithstanding this, as discussed with Council engineers on 27 April 2022, the proposed impervious area is approximately 45m ² more than the area in the approved design for Stage 1. This small increase is immaterial to the function of the existing approved OSD system.
		6. Stormwater runoff from the entire site shall be discharged by gravity system. In this regard, downstream easement(s) is required. Details have not been provided in the information submitted with the subject application.	The entire site discharges via gravity via the existing approved connections to Finlayson's Creek indicated on Stellen drawing P170829-DR-100-2 and AJW drawing 2014-0241 H03.
	Acoustic	7. No details provided regarding assessment of noise that will be generated from the proposed upper levels outdoor courtyards.	As demonstrated previously, the Noise and Vibration Impact Assessment has been updated to include assessment of noise of the Level 3 courtyard. The predicted noise levels indicate that compliance is achieved for the day and evening time periods at the nearest noise sensitive receive provided no more than 30 users are speaking in normal voices on the outdoor balcony at any time. It is noted that the courtyard on Level 3 will incorporate full height glazing with a roof and hence it is not anticipated that the Level 3 courtyard would result in any adverse acoustic impacts.
	Land Contamination	8. A Long Term Environmental Management Plan for the contamination capping on site must be submitted to Council to ensure contamination notations are added to the property for planning certificates under section 10.7 of the Environmental Planning and Assessment Act 1979. If the burrow Pit is to be constructed on site then the remedial works plan report should be submitted to council for review of the location and the works that will be carried out at the site. It is recommended that all validation reports are submitted to Council for review on completion of works.	It is noted that no burrow pits are proposed for the proposal. A Long Term Environmental Management Plan will be provided prior to the commencement of construction following clarification of the comment.
	Waste Management	9. Due to the development being commercial in nature, a private waste collection has been proposed. In the event that Council cannot service this development given no details provided regarding the access arrangement of	Noted.



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		waste collection vehicle size to the site, condition to maintain such private waste collection arrangement should the development be approved in its current form is recommended.	
	Parkland and Open Space	10. The delineation of the boundary bordering Council's Reserve (and access laneway) by a continuous 2.1m high black rod top and bottom palisade fence (tubular steel / school type) with no direct access to the reserve shall be provided. Any fencing adjoining to proposed driveway shall maintain the appropriate sightlines. Street tree planting needs to be consistent with the existing (intervals and species). Built structure is very close to the western boundary bordering Council's Lytton Street Park and the proposal would be expected to increase overshadowing of the park and to impact on the integrity of mature trees adjoining to the site's boundaries.	As demonstrated in the Architectural Plans, a continuous 2.1m high palisade fencing will be provided along the site boundaries with no direct access to Lytton Street Park. Landscaping will also be provided around the security fence to soften the built form. Appropriate sightlines have been maintained for fencing adjoining to proposed driveway. As demonstrated in the Shadow Diagrams, Lytton Street Park will receive a minimum of three hours of sunlight access. In addition, the proposed building height has been reduced in response to Council's comment, which will also reduce the overshadowing impact on the adjoining open space.
		11. Development works to be coordinated to ensure access through Council's Reserve is not required. There is no provision under the Local Government Act 1993 for the use of community land for private development. Temporary access or occupation of community will be considered only in special circumstances on application.	Noted.
		12. The proposed planting <i>Corymbia citirodora</i> needs to be substituted to <i>Corymbia maculata</i> . <i>Corymbia citirodora</i> is known to hybridise and its substitution will protect the local critically endangered ecological community.	As demonstrated in the Landscape Strategy, <i>Corymbia citirodora</i> has been substituted to <i>Corymbia maculate</i> .
	Tree Management	13. It is recommended that all trees that are to be retained as part of the proposed upgrade of this site are appropriately protected as per AS4970 - 2009 Protection of trees on development.	Noted. All trees to be retained will be protected in accordance with AS 4970-2009.



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		14. As per the recommendations of the Arboricultural Impact Assessment by Birds Tree Consultancy, prior to demolition and construction a project arborist should be appointed to ensure tree protection recommendations of the report are adhered to and all trees on the site and within the neighbouring reserve are retained and suitably protected throughout the life of the development.	Noted. A project arborist will be appointed.
		15. Reference is made in the report to Tree 41. It is recommended that further investigation via picus sonic tomograph by a suitably qualified AQF5 arborist to determine the presence and extent of internal decay. dependant on the findings the removal of this tree may be necessary.	As demonstrated in the Arborist Report, the TPZ of Tree 41 will be encroached by the proposed development by 18%. Tree 41 will require canopy reduction of approximately 20% of the canopy. Tree 41 has a bark inclusion within the primary junction which places this tree at increased risk of failure at this point. In consideration of the future development and the increased number of targets and therefore increased hazard posed, it is recommended by Birds Tree Consultancy that a Level 2 (TRAQ) Risk Assessment be carried out on this tree to determine the level of risk and viability of the tree for retention. This tree is nominated for retention until proven otherwise.
		16. During construction or any time during the development, any pruning works should be carried out to AS4373 - 2007 Pruning of amenity trees by a minimum AQF3 qualified arborist.	Noted.
		17. All associated landscape works should be carried out by a minimum AQF3 qualified landscaper to industry standards. All works should be inspected to ensure works have been carried out to a satisfactory standard prior to issuing of an occupation certificate.	Noted.
	Exclusion of Application of Development Control Plans	18. In accordance with Clause 2.10 of State Environmental Planning Policy (Planning Systems) 2021, development control plans (whether made before or after the commencement of this Policy) do not apply to (a) state significant development. Notwithstanding this, the following items as per the Part F4-1 23-27 Lytton Street, Wentworthville and Part G Miscellaneous Development	The proposed development exhibits the following setbacks: <ul style="list-style-type: none"> ▪ Eastern (front) boundary: Approximately 6.2m ▪ Western (rear) boundary: 0 to 6m ▪ Southern (side) boundary: Approximately 1.6m measured from the carpark wall and approximately 4.2m measured from the closest building column




TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		<p>under Cumberland Development Control Plan (CDCP) 2021, are raised for your attention.</p> <p>The objectives of Part F4-1 23-27 Lytton Street, Wentworthville is to ensure that any future development on the site provides adequate separation to adjacent properties the low density development is consistent with that allowed under the R2 zone of Cumberland LEP 2021 and to protect the amenity of nearby properties and the use of those properties.</p> <p>a) Setbacks - Any new building on the property is to adhere to the following setbacks from the identified property boundary, which have not been demonstrated by the proposed development.</p> <ul style="list-style-type: none"> ▪ minimum of 6m setback from the front (street facing) property boundary. This setback distance may be reduced in order to align the new building with an existing building on the property; ▪ minimum of 6m setback from the rear property boundary; ▪ minimum of 3m setback from the side property boundary; and ▪ minimum of 3m setback from the side and from the rear property boundaries to be applied to basement levels. 	<ul style="list-style-type: none"> ▪ Northern (side) boundary: Approximately 1.9m (unchanged) <p>It is noted the proposed front boundary is compliant with the front setback requirement of 6m. In relation to the western boundary, the proposal provides a variable setback of 0 to 6m due to the irregular shape of the Site and design requirements of the western carpark, in which it would be unfeasible to provide a 6m setback along the entire western site boundary. The western building has been designed to maximise the provision of carparking on the Lower Ground and Ground Levels to satisfy the parking demand on Site whilst ensuring compliance with turning paths and vehicular access requirements. By providing the western carpark in its proposed form, this would negate the need to provide carparking along the Lytton Street frontage, which would impact on the visual quality of the building when viewed from Lytton Street. Overall, the western boundary interface is mitigated through materials, modulation and landscape design to ensure that it is unobtrusive and integrates with the existing facility to provide a positive perception when viewed from private properties and the public domain.</p> <p>Further, it is noted that the proposed floorplate of the western block is of similar configuration as the existing built form in the western portion. As illustrated below, the current facility exhibits a setback of less than 6m and is adequately screened by the mature vegetation on Site.</p>



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
			 <p>Figure 1 Aerial Map of current site configuration (Nearmap 2022)</p> <p>In relation to the southern setback, it is noted that the proposal is predominantly compliant with the southern setback requirement as the ground level comprises an undercroft carpark and the landscape courtyard space. While the retaining wall of the carpark extends towards the southern boundary, providing a setback of 1.6m, the retaining wall will not encroach the pedestrian footpath and will maintain sufficient space for pedestrians to use. The remaining portion of the ground floor area provides sufficient setback, with a setback of 4.2m from the closest building column in the south western corner of the building which will be unobtrusive and integrate with the overall built form.</p>



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
			<p>The northern setback will remain unchanged at 1.9m as the proposal does not involve any external alterations to the Stage 1 building.</p> <p>Accordingly, the proposed setbacks are considered to be appropriate for the development and are deemed consistent with the objectives.</p>
		<p>b) Height - The permitted number of storeys shall not exceed 4 for a 15m building height limit within the locality being a high density residential area. Part of the proposed building appears to contain a 5 storey element that is incompatible with the existing adjoining developments. This has not been demonstrated.</p>	<p>The proposal exhibits a part three part four storey and does not include a five-storey element.</p>
		<p>c) Earthworks - Details of cut and fill proposed shall be provided.</p>	<p>317m³ cut is proposed with no fill works as part of the development.</p> <p>As demonstrated in the Geotechnical Investigation submitted, minimal excavation is anticipated for the proposed development as it will be at or above the existing surface levels. Local excavations may be required for lift pits and service trenches, but it is not anticipated that these will exceed 1.5m depth.</p>
		<p>d) Traffic and Parking - Proposed parking spaces are inadequate. Car parking space numbers shall comply with Guide to Traffic Generating Development requirements. In this regard, a minimum of 102 parking spaces shall be provided.</p>	<p>While the TfNSW <i>Guide to Traffic Generating Developments</i> provides parking rates for private hospitals, the rates provided are generic state-wide rates derived from 1994 data (28 years ago) that do not take into consideration the unique operational requirements for individual developments, as discussed above.</p> <p>As demonstrated in the Traffic Statement (Appendix C6), a first principles approach derived from the operational details for the development is considered more appropriate for establishing parking demands. In order to derive an appropriate carparking rate, consideration has been given to staff parking, in-patient parking, consulting suite parking and day program visitors.</p>



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
			<p>It is noted that the proposed development is expected to see a parking demand of 81 car parking spaces. The proposal provides a total of 77 off-street parking spaces, which is a minor departure from the expected parking demands, noting the nearby on-street parking conditions have spare capacity for four parking spaces. Notwithstanding, it is a suitable condition of consent for a site-specific Green Travel Plan and Travel Access Guide to be prepared prior to occupancy can be incorporated.</p> <p>Additionally, the Site is located in proximity to active and public transport. It is recommended that a Travel Access Guide be prepared to provide public and active transport information for staff and visitors.</p> <p>It is noted that a parking survey was conducted on 10 August 2022 which confirms:</p> <p><i>At a minimum there is 118 vacant parking spaces at 10am, and an average of 124 parking spaces available across the entire day. As such, there is sufficient free on-street capacity to accommodate the four (4) parking space shortfall associated with the proposed clinic expansion. It is also noteworthy, that a site-specific Green Travel Plan could potentially reduce private car usage generally, and as such, the continual support is provided for the proposal.</i></p> <p>Refer to Appendix C6a for further details.</p>
		<p>19. Turning areas shall be provided in the blind aisles as per as per Australian standard AS2890.1 requirement. Turning area has not been provided for Stage 2 undercover at grade car parking.</p>	<p>Allocated "Staff Only Parking" will be provided on the ground level carpark of the Stage 2 building to ensure the carpark meets the requirements of 2.4.2(c) of AS2890.1 (2004). Clause 2.4.2 states that the maximum length of a blind aisle shall be equal to the width of six 90-degree spaces plus 1m, unless provision is made for cars</p>



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
			to turn around at the end and drive out forwards. Appropriate “No Visitor Parking Pass this Point” signage will be provided to advise visitors that staff only parking is available for the last three spaces in the blind aisle. This signage will be situated above the aisle to ensure adequate visibility is provided to visitors. Refer to the statement prepared by Traffix dated 27 July 2022 at Appendix C6 .
		20. Driveway access to Staged 2 parking shall be designed comply with two way access. Driveway/layback shall be minimum 1.2m from the power pole. Parking layout and ramp gradients shall comply with Australian standard AS2890.1 and AS2890.6. Dimensions (parking space length and width, aisle width, parking space gradients, head height clearance, extensions at dead end aisles, etc.) shall be shown on the plan. Bicycle parking spaces shall be addressed as part of construction certificate drawings.	Stage 2 parking provides 13 Class 3 parking spaces. In accordance with Table 3.1 of AS2890.1 (2004), the access driveway is required to be designed as a Category 1 access being 3.0-5.5m wide. In response, the access is approximately 6.0m wide (measured at the boundary), exceeding the minimum requirements of AS2890.1. With regards to the power pole offset, the development relies on the existing driveway crossing which has been operating satisfactorily for a numbers with no issues. In addition, the proposal reduces the number of car parking spaces via the access, thus improving conditions with respect to the existing operation. Minor amendments to the carparking layout can be undertaken at CC stage to address compliance with AS2890.1 (2004) and AS2890.6 (2009). Refer to the statement prepared by Traffix dated 27 July 2022 at Appendix C6 .
Heritage NSW	N/A	<p>The ACHAR found that the study area highly disturbed and had nil-low potential for Aboriginal objects or sites to be located within the proposed development footprint. Heritage NSW concurs with this assessment.</p> <p>The ACHAR makes the following recommendations:</p> <ul style="list-style-type: none"> ▪ As the study area was found to be disturbed and to have a nil-low potential for Aboriginal objects to be located within it, it is recommended that further assessment is not required. ▪ As the results of the consultation indicate that there are no sites of places of significance in the study area, no further consideration is required. ▪ Consultation supports the view of the Deerubbin LALC representative during the site inspection who did not 	Noted.



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

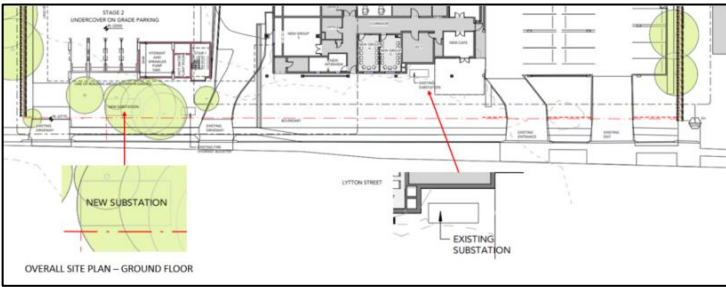
TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		<p>identify any cultural significance associated with the study area.</p> <ul style="list-style-type: none"> ▪ If changes are made to the proposal that may result in impacts to areas not assessed by this ACHAR further assessment would be required. ▪ Unexpected Aboriginal objects remain protected by the National Parks and Wildlife Act 1974. If any such objects, or potential objects, are uncovered during the activity, all work in the vicinity should cease immediately. A qualified archaeologist should be contacted to assess the find and Heritage NSW and Deerubbin LALC must be notified. ▪ If human remains, or suspected human remains, are found during the activity, all work in the vicinity should cease, the site should be secured, and the NSW Police and Heritage NSW should be notified <p>Heritage NSW concurs with all the recommendations documented in the ACHAR with respect to the management of Aboriginal cultural heritage, and as such, does not need to be consulted with respect to this proposal again.</p>	
Endeavour Energy	Network Capacity/Connection	<p>Endeavour Energy has noted the following in the Building Services Interface - Existing Building And New Building.</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>2.4 SUBSTATION</p> <p>A preliminary maximum demand based on area methods give a preliminary additional demand of 500kVA. The existing substation is rated at 750kVA. It services the current hospital, plus a street feeder. A recorded peak of 491kVA has been advised by the supply authority.</p> <p>It is anticipated the substation will require upgrade/replacement to allow for the additional extension works to the hospital – Preliminary calculations indicate a 1500kVA substation to replace existing via a new substation installed adjacent/nearby the existing (subject to Endeavour Energy assessment).</p> <p>Final supply arrangements are required to be negotiated by the successful contractor with the local supply authority.</p> </div> <p>The following extract of the Overall Site Plan – Ground Floor shows provision for a ‘New Substation’ to the south of the</p>	Noted. As illustrated in the Architectural Plans, a new substation will be provided on ground level fronting Lytton Street.



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
 23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		<p>'Existing Substation' near 'Stage 2 Undercover On Grade Parking'. From Endeavour Energy's perspective the fact that provision is being made for a padmount substation is a positive. Endeavour Energy's general requirements is for a padmount substation to be at ground level and have direct access from a public street (unless provided with appropriate easements for the associated underground cables and right of access). The padmount substation must be protected by an easement and associated restrictions benefiting and gifted to Endeavour Energy. Please refer to Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights'.</p>  <p>The diagram is an 'OVERALL SITE PLAN - GROUND FLOOR'. It shows a building footprint at the top. Below the building, there is a 'STAGE 2 UNDERCOVER ON GRADE PARKING' area. To the right of the parking area, there is an 'EXISTING SUBSTATION' located near 'LYTTON STREET'. Further to the left, a 'NEW SUBSTATION' is indicated by a red dashed line. A red arrow points from the text above to the existing substation. The plan also shows various utility lines and easements.</p>	
		<p>Generally it is the Level 3 Accredited Service Provider's (ASP) responsibility (engaged by the developer) to make sure that the substation location and design complies with Endeavour Energy's standards the suitability of access, safety clearances, fire ratings, flooding etc. As a condition of the Development Consent the Department should request the submission of documentary evidence from Endeavour Energy confirming that satisfactory arrangements have been made for the connection of electricity and the design requirements for the decommissioning of the existing substation and commissioning of the new substation.</p>	



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		Subject to the foregoing Endeavour Energy has no objection to the Development Application.	
DPE Water	Predetermination	Should groundwater be intercepted a Water Access Licence (WAL) under the Water Management Act 2000 must be obtained unless the take is less than or equal to 3ML of water per year for any aquifer interference activities listed in Clause 7 of Schedule 4 of the Water Management (General) Regulation 2018. For more information visit https://www.dpie.nsw.gov.au/nrar/how-to-apply/water-licences/groundwater .	Noted.
TfNSW (RMS)		TfNSW has reviewed the submitted application and raises no objections, based on the consideration that additional traffic generation is not likely to adversely impact the classified road network.	Noted.
Sydney Water		<p>We advocate that the proponent lodges a feasibility with Sydney Water as soon as possible via their Water Services Coordinator or their account manager to ensure that ample time is given to investigate any design impacts on our easements and/or amplification requirements.</p> <p>Water Servicing</p> <ul style="list-style-type: none"> ▪ Potable water servicing should be available via a 100mm DICL watermain (laid in 1987) on Lytton Street. ▪ Amplifications or alterations to the potable water network may be required complying with the Water Services Association of Australia (WSAA) code - Sydney Water edition. <p>Wastewater Servicing</p> <ul style="list-style-type: none"> ▪ Wastewater servicing should be available via a 525mm RC 	Noted. A Section 73 application will be submitted following approval of the subject SSD.



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
 23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		<p>wastewater branch main (laid in 1957) traversing the western extremity of the site from south to north.</p> <ul style="list-style-type: none"> Amplifications or alterations to the wastewater network may be required complying with the Water Services Association of Australia (WSAA) code – Sydney Water edition. <p>Stormwater Asset</p> <ul style="list-style-type: none"> Sydney Water owns and maintains a 5970×2057mm open stormwater channel which is located on the western side of the development site. No buildings or permanent structures are to be proposed within one metre from the outside of the channel. <p>This advice is not formal approval of our servicing requirements. Detailed requirements, including any potential extensions or amplifications, will be provided once the development is referred to Sydney Water for a Section 73 application. More information about the Section 73 application process is available on our web page in the Land Development Manual.</p>	
	Attachment 1	<p>Section 73 Compliance Certificate</p> <p>A Section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained from Sydney Water.</p> <p>The proponent is advised to make an early application for the certificate, as there may be water and wastewater pipes to be built that can take some time. This can also impact on other services and buildings, driveways or landscape designs.</p> <p>Applications must be made through an authorised Water Servicing Coordinator. For help either visit www.sydneywater.com.au > Plumbing, building and</p>	A Section 73 Compliance Certificate will be obtained following approval of the subject SSD.



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		developing > Developing > Land development or telephone 13 20 92.	
		<p>Building Plan Approval</p> <p>The approved plans must be submitted to the Sydney Water Tap in™ online service to determine whether the development will affect any Sydney Water sewer or water main, stormwater drains and/or easement, and if further requirements need to be met.</p> <p>The Tap in™ service provides 24/7 access to a range of services, including:</p> <ul style="list-style-type: none"> ▪ building plan approvals ▪ connection and disconnection approvals ▪ diagrams ▪ trade waste approvals ▪ pressure information ▪ water meter installations ▪ pressure boosting and pump approvals ▪ changes to an existing service or asset, e.g. relocating or moving an asset. <p>Sydney Water's Tap in™ online service is available at: https://www.sydneywater.com.au/SW/plumbing-building-developing/building/sydney-water-tap-in/index.htm</p> <p>Sydney Water recommends developers apply for Building Plan approval early as in some instances the initial assessment will identify that an Out of Scope Building Plan Approval will be required.</p>	Noted.



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
 23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		<p>Out of Scope Building Plan Approval</p> <p>Sydney Water will need to undertake a detailed review of building plans:</p> <p>1. That affect or are likely to affect any of the following:</p> <ul style="list-style-type: none"> ▪ Wastewater pipes larger than 300mm in size ▪ Pressure wastewater pipes ▪ Drinking water or recycled water pipes ▪ Our property boundary ▪ An easement in our favour ▪ Stormwater infrastructure within 10m of the property boundary. <p>2. Where the building plan includes:</p> <ul style="list-style-type: none"> ▪ Construction of a retaining wall over, or within the zone of influence of our assets ▪ Excavation of a basement or building over, or adjacent to, one of our assets ▪ Dewatering - removing water from solid material or soil. <p>The detailed review is to ensure that:</p> <ul style="list-style-type: none"> ▪ our assets will not be damaged during, or because of the construction of the development ▪ we can access our assets for operation and maintenance ▪ your building will be protected if we need to work on our assets in the future. <p>The developer will be required to pay Sydney Water for the costs associated with the detailed review.</p>	Noted.



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
 23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		<p>Tree Planting</p> <p>Certain tree species placed in close proximity to Sydney Water's underground assets have the potential to inflict damage through invasive root penetration and soil destabilisation. Sydney Water requires that all proposed or removed trees and vegetation included within the proposal adhere to the specifications and requirements within Section 46 of the Sydney Water Act (1994) and Diagram 5 - Planting Trees within our Technical guidelines - Building over and adjacent to pipe assets. Please note these guidelines include more examples of potential activities impacting our assets which may also apply to your development.</p> <p>If any tree planting proposed breaches our policy, Sydney Water may need to issue an order to remove every tree breaching the act, or directly remove every tree breaching the Act and bill the developer or Council for their removal.</p>	Noted.
	Attachment 2	<p>Requirements for Business Customers for Commercial and Industrial Property Developments.</p> <p>Trade Wastewater Requirements</p> <p>If this development is going to generate trade wastewater, the property owner must submit an application requesting permission to discharge trade wastewater to Sydney Water's sewerage system. You must obtain Sydney Water approval for this permit before any business activities can commence. It is illegal to discharge Trade Wastewater into the Sydney Water sewerage system without permission.</p> <p>The permit application should be emailed to Sydney Water's</p>	



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		<p>Business Customer Services at businesscustomers@sydneywater.com.au</p> <p>A Boundary Trap is required for all developments that discharge trade wastewater where arrestors and special units are installed for trade wastewater pre-treatment.</p> <p>If the property development is for Industrial operations, the wastewater may discharge into a sewerage area that is subject to wastewater reuse. Find out from Business Customer Services if this is applicable to your development.</p>	
		<p>Backflow Prevention Requirements</p> <p>Backflow is when there is unintentional flow of water in the wrong direction from a potentially polluted source into the drinking water supply.</p> <p>All properties connected to Sydney Water's supply must install a testable Backflow Prevention Containment Device appropriate to the property's hazard rating. Property with a high or medium hazard rating must have the backflow prevention containment device tested annually. Properties identified as having a low hazard rating must install a non-testable device, as a minimum.</p> <p>Separate hydrant and sprinkler fire services on non-residential properties, require the installation of a testable double check detector assembly. The device is to be located at the boundary of the property.</p> <p>Before you install a backflow prevention device:</p> <ol style="list-style-type: none"> 1. Get your hydraulic consultant or plumber to check the 	Noted.



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
 23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		<p>available water pressure versus the property's required pressure and flow requirements.</p> <p>2. Conduct a site assessment to confirm the hazard rating of the property and its services. Contact PIAS at NSW Fair Trading on 1300 889 099.</p> <p>For installation you will need to engage a licensed plumber with backflow accreditation who can be found on the Sydney Water website: https://www.sydneywater.com.au/plumbing-building-developing/plumbing/backflow-prevention.html</p>	
		<p>Water Efficiency Recommendations</p> <p>Water is our most precious resource and every customer can play a role in its conservation. By working together with Sydney Water, business customers are able to reduce their water consumption. This will help your business save money, improve productivity and protect the environment.</p> <p>Some water efficiency measures that can be easily implemented in your business are:</p> <ul style="list-style-type: none"> • Install water efficiency fixtures to help increase your water efficiency, refer to WELS (Water Efficiency Labelling and Standards (WELS) Scheme, http://www.waterrating.gov.au/ • Consider installing rainwater tanks to capture rainwater runoff, and reusing it, where cost effective. Refer to https://www.sydneywater.com.au/your-business/managing-your-water-use/water-efficiency-tips.html • Install water-monitoring devices on your meter to identify water usage patterns and leaks. • Develop a water efficiency plan for your business. 	Noted.



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
 23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 1 RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTOR	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
		It is cheaper to install water efficiency appliances while you are developing than retrofitting them later.	
		<p>Contingency Plan Recommendations</p> <p>Under Sydney Water's customer contract Sydney Water aims to provide Business Customers with a continuous supply of clean water at a minimum pressure of 15meters head at the main tap. This is equivalent to 146.8kpa or 21.29psi to meet reasonable business usage needs.</p> <p>Sometimes Sydney Water may need to interrupt, postpone or limit the supply of water services to your property for maintenance or other reasons. These interruptions can be planned or unplanned.</p> <p>Water supply is critical to some businesses and Sydney Water will treat vulnerable customers, such as hospitals, as a high priority.</p> <p>Have you thought about a contingency plan for your business? Your Business Customer Representative will help you to develop a plan that is tailored to your business and minimises productivity losses in the event of a water service disruption.</p> <p>For further information please visit the Sydney Water website at: https://www.sydneywater.com.au/your-business/managing-trade-wastewater/commercial-trade-wastewater.html or contact Business Customer Services on 1300 985 227 or businesscustomers@sydneywater.com.au.</p>	Noted.



2.1.1 Assessment against Chapter 3 of Industry and Employment SEPP

In response to item 10 in the DPE submission, a detailed assessment against the relevant provisions of Chapter 3 of the Industry and Employment SEPP has been undertaken for the proposed signage.

The proposed signage relates to Chapter 3 of the Industry and Employment SEPP which aims to ensure that outdoor advertising is compatible with the desired amenity and visual character of an area, provides effective communication in suitable locations and is of high quality and finish.

The proposed development seeks consent for the signage zones for the proposed mental health facility. The proposed development is considered to meet the aims and objectives of Chapter 3 of the Industry and Employment SEPP for the following reasons:

- It relates directly to the health services use of the Site and will serve building identification and wayfinding purposes within the Site.
- The proposed signage zones are compatible with the surrounding residential character.
- The proposed signage zones are compatible with the desired future character of the area and will positively contribute to the streetscape through high quality design, construction and finish.
- Considering the proposed mental health facility, the proposed signage zones will integrate with the existing built form, in terms of setting, scale and design.

The proposed signage is considered to be compatible with the aims and objectives of the Industry and Employment SEPP.

The assessment criteria under Schedule 5 of the Industry and Employment SEPP are addressed in **Table 2**.

TABLE 2 SEPP 64 ASSESSMENT	
Criteria	Assessment
<p>1. Character of the area</p> <p>Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?</p> <p>Is the proposal consistent with a particular theme for outdoor advertising in the area of locality?</p>	<p>The proposal is compatible with the residential character of the Wentworthville locality and seeks to provide logical and appropriate signage for the proposed development.</p> <p>The proposed signage is consistent with the existing and desired future character of the area and is consistent with the overall signage theme of the locality.</p>
<p>2. Special areas</p> <p>Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?</p>	<p>The proposal would not impose adverse amenity or visual impacts in the area. The proposed signage will be erected for the proposed health services facility situated within the Wentworthville locality, in which the Site has been operating as to provide specialist health services. Further, high quality design would be adopted for the proposed signage and hence would enhance the visual quality of the locality.</p>
<p>3. Views and vistas</p> <p>Does the proposal obscure or compromise important views?</p> <p>Does the proposal dominate the skyline and reduce the quality of vistas?</p> <p>Does the proposal respect the viewing rights of other advertisers?</p>	<p>The proposed signs are of appropriate size which are compatible with the proposed health services facility. The proposed signs would not obscure or compromise any important views.</p> <p>The proposed signage does not dominate the skyline or reduce the quality of vistas.</p> <p>The proposed signage respects the viewing rights of other advertisers.</p>
<p>4. Streetscape, setting or landscape</p>	<p>The size of the proposed signage is compatible with the streetscape of Lytton Street and will integrate with the proposed landscape design on the streetscape.</p>



RESPONSE TO SUBMISSIONS REPORT

<p>Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?</p> <p>Does the proposal contribute to the visual interest of the streetscape, setting or landscape?</p> <p>Does the proposal reduce clutter by rationalising and simplifying existing advertising?</p> <p>Does the proposal screen unsightliness?</p> <p>Does the proposal protrude above buildings, structures or tree canopies in the area or locality?</p> <p>Does the proposal require ongoing vegetation and management?</p>	<p>The signage has been designed by a reputable designer to create visual interest.</p> <p>The signage is not proposed to create clutter.</p> <p>The proposed signage will not be used to screen unsightliness.</p> <p>The proposed signs will not protrude above buildings, structures or tree canopies in the area and does not require ongoing vegetation management.</p>
<p>5. Site and building</p> <p>Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?</p> <p>Does the proposal respect important features of the site or building, or both?</p> <p>Does the proposal show innovation and imagination in its relationship to the site or building or both?</p>	<p>The proposed signage is compatible with the scale of the proposed health services facility. The proposed signage seamlessly integrates with the Site.</p> <p>The proposed signs have been suitably located within the Site and have been logically positioned to ensure that important features are not obscured.</p> <p>The signage has been designed to respect the architecturally designed building and complement its design by providing appropriate building identification.</p> <p>The aesthetic design of the signage shows innovation and imagination in the relationship with the Site and its context.</p>
<p>6. Associated devices and logos with advertisements and advertising structures</p> <p>Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?</p>	<p>Detailed signage plans of the proposed signage for the proposed health services facility would be determined during detailed design stage. It is anticipated that the logo of the facility and directions to the entry point would be included as part of the signage erected.</p> <p>No lighting devices are proposed for the signage.</p>
<p>7. Illumination</p> <p>Would illumination result in unacceptable glare?</p> <p>Would illumination affect safety for pedestrians, vehicles or aircraft?</p> <p>Would illumination detract from the amenity of any residence or other form of accommodation?</p> <p>Can the intensity of the illumination be adjusted if necessary?</p> <p>Is the illumination subject to a curfew?</p>	<p>No illumination is proposed.</p>



RESPONSE TO SUBMISSIONS REPORT

<p>8. Safety</p> <p>Would the proposal reduce the safety for any public road?</p> <p>Would the proposal reduce the safety for pedestrians or bicyclists?</p> <p>Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?</p>	<p>The proposed signage would not reduce the safety of any road users on any public road, as the signs will be set back from the public road and provides adequate clearance from the footpath.</p> <p>The proposed signage will not obscure sightlines from public areas.</p>
--	--

2.2 RESPONSE TO PUBLIC AND OTHER STAKEHOLDER SUBMISSIONS

A total of three public submissions were received during the exhibition period, with all submissions providing objections.

Table 3 below tabulates the public submissions received and provides a detailed response to the submissions.



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

TABLE 3 RESPONSE TO PUBLIC SUBMISSION			
SUBMITTER	MATTERS RAISED	COMMENTS/REQUESTS	FORMAL RESPONSE
Name withheld Wentworthville	Objection	<p>Reasons for objection.</p> <p>Following reason I am object this development.</p> <ul style="list-style-type: none"> a. This building zone is in the medium housing zone. Not suitable for 4 story development b. This building is located to children park (Lytton park) This is used by children and adults for their leisure activities. Safety of children is very important. There is danger for children and their activity. (type of treatment in this building and may increase predators in this park. c. Road traffic. Already lot of development in Wentworthville (veron St, Station st and lane street which is created heavy traffic in this road. Also Essention road and Parramatta road Park has several entry points such as Lytton st, Veron st and Kleen st. Lot of pedestrian movement around this park. Increase of traffic will endanger the public and small children. d. Park is used by minor children after their school. We need to increase the size of park not building. <p>Finally I have not contributed any funding for political parties in my life.</p>	<ul style="list-style-type: none"> a. The Site is zoned R4 High Density Residential zone under the <i>Cumberland Local Environmental Plan 2021</i> (CLEP2021). Four storeys are considered to be appropriate under a 15m height limit. It is noted that the proposed building height has been reduced to 18.364m in response to Council's comments. b. The proposed development has been designed in accordance with the Crime Prevention through Environmental Design (CPTED) principles. Specifically, the proposed development is a secure facility from the perspective of public access, with monitored access points at the main entry and CCTV monitoring of the external areas. The facility also operates 24 hours a day and there are continual staff and patient movement within the Site. Therefore, the proposal will not affect public safety. c. As demonstrated in the Traffic and Accessibility Impact Assessment submitted for the SSD, the proposed development generates minor impacts on the road network and proportionally would contribute negligibly to external network improvement. Both Lytton Street and Veron Street and Lytton Street and Fullagar Road intersections in the 2031 scenario will continue to operate good with acceptable delays and no external improvements required to support the proposed development. d. The proposal is limited to the site boundary only. The proposed development will not impact on the use of the adjoining park by the public.
Name withheld Merrylands	Objection	<p>Concerned that this mental facility will be built clear near childcare centres and schools. I have my child enrolled in the new childcare centre on the corner of Bridge Road and Hudson and don't like the fact that our children could be exposed to dangerous or unstable people.</p>	<p>CPTED principles have been incorporated in the design of the proposed development. As demonstrated in the Architectural Design Statement (Appendix C3), there is strict access control to the facility via the main front entry. Access to the Site is constantly monitored and controlled and members of the general public are not permitted inside the building unless they are visiting a patient.</p>



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

			Staff will be equipped with swipe cards to obtain access into non-patient areas which are linked back to the Site security system. The proposed health services facility will comprise monitored access points at the main entry and CCTV monitoring of the external areas.
Lakshmi Balachandran	Objection	I got a letter regarding redevelopment of the Wentworthville Northside West Clinic. I am totally against it. I do not want more crowd & noise in our area. There are more cars moving around. This Council don't listen to us. Now there are so many flats around, which makes the place look like third world. Sorry I don't agree.	<p>As demonstrated in the updated Noise and Vibration Impact Assessment (Appendix C9), the proposed development is expected to comply with the relevant noise criteria.</p> <p>As demonstrated in the Traffic and Accessibility Impact Assessment, the proposed development generates minor impacts on the road network and proportionally would contribute negligibly to external network improvement. Both Lytton Street and Veron Street and Lytton Street and Fullagar Road intersections in the 2031 scenario will continue to operate good with acceptable delays and no external improvements required to support the proposed development.</p>



PART D SUMMARY OF CHANGES

In reviewing the submissions received from various agencies, some amendments to the project are proposed to modify the design of the health services facility and provide clarification. However, it is noted that most matters required further clarification, rather than design changes for the project. Items for clarification and their related responses are provided within **Section 3.1** of this RTS Report.

The following subsections outline the project amendments and any necessary environmental assessment and/or commentary.

4.1 PROJECT DESCRIPTION

The proposed development seeks development consent for the following:

- Demolition of the existing two-storey west wing building and carpark in the southern portion;
- Construction of a four-storey extension of the existing Wentworthville Northside West Clinic including two levels of patient area and two levels of parking on the western boundary and three storeys of patient area and one level of at grade carparking along the southern boundary, comprising:
 - Addition of 95 inpatient rooms and nine consulting suites across Levels 1 to 3, resulting in a total of 125 inpatient units
 - Provision of 18 carparking spaces on Lower Ground Level and 28 carparking spaces on Ground Level, resulting in a total of 77 carparking spaces
- Alterations and additions to existing Stage 1 building comprising:
 - A new lobby, gym, loading bay, ancillary office and associated amenities on Lower Ground Level
 - A new lobby, art room and amenities on Ground Level
- Construction of a landscaped open space in the south western portion of the Site and an internal courtyard on Level 1
- Associated landscaping on the Lytton Street frontage, in the Level 1 inner courtyard, Level 2 and Level 3 courtyards
- Removal of a total of 35 trees in the southern and western portions of the Site
- Erection of three pylon signs along Lytton Street for wayfinding purposes

Consent is sought to develop the subject site for a health services facility, in accordance with the following development particulars.

TABLE 4 PROPOSED DEVELOPMENT PARTICULARS	
Project Element	Development Particular
Site Area	6,655m ²
General	The proposed development constitutes SSD pursuant to Schedule 1 Clause 14 of the <i>State Environmental Planning Policy (Planning Systems) 2021</i> (Planning Systems SEPP).
Primary Land Use	Health services facility
Total GFA	<ul style="list-style-type: none"> ▪ Existing GFA (Stage 1): 2,786m² ▪ Proposed GFA (Stage 2): 4,498m²



TABLE 4 PROPOSED DEVELOPMENT PARTICULARS	
Project Element	Development Particular
	<ul style="list-style-type: none"> ▪ Total GFA: 7,284m²
Floor Space Ratio	1.09:1
Building Height	15.31m-18.67m
Car parking	<ul style="list-style-type: none"> ▪ Stage 1: 31 spaces (including 2 accessible spaces) ▪ Stage 2: <ul style="list-style-type: none"> ○ Level 1: 41 units (including 3 accessible units) ○ Level 2: 29 units (including 2 accessible units) ○ Level 3: 25 units (including 3 accessible units) ▪ Total: 77 carparking spaces
CIV	\$32,480,465 (excluding GST)
Construction Jobs	Approximately 60
Operational Jobs	23

4.2 BUILT FORM

Following the review and consideration of submissions received, a number of design changes have been accommodated:

- Decrease in maximum building height to 18.67m, resulting in a variation of 24.5% only
- Erection of three pylon signs along Lytton Street for wayfinding purposes
- Potential incorporation of public art through the erection of a major installation by local artists on a canvas nearly 3m wide by between 15-20m high, subject to further investigation at detailed design stage

4.2.1 Building Height

In response to submissions from DPE and Cumberland City Council, the building height of the proposed development has been reduced to 15.31m to 18.67m, representing a variation of 2% to 24.5% across the Site. As illustrated in **Figure 2**, the building height has been reduced on the eastern elevation and that the revised building height will be close to the 15m height limit measured at the site boundary. The building will appear to be approximately 15m in height when viewed from the streetscape of Lytton Street.



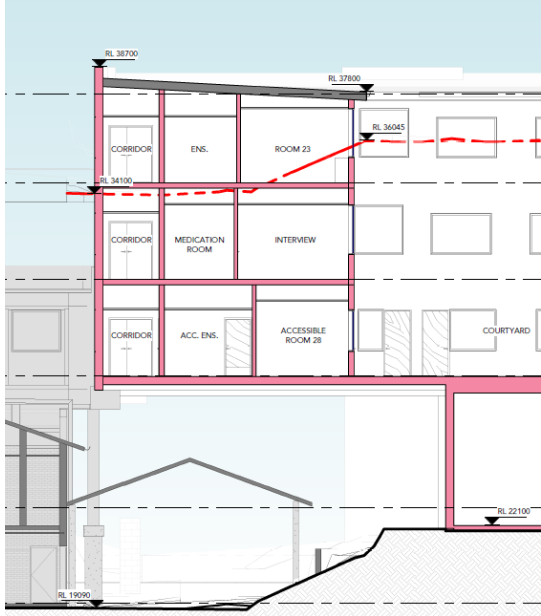
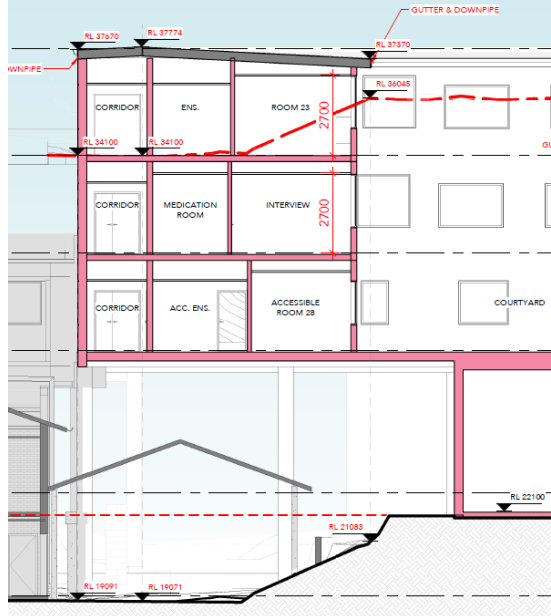
Figure 2 East Elevation - Lytton Street View (Team 2 Architects 2022)

RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
 23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-T7899480

The portion exhibiting the maximum building height remains to be located on the existing driveway due to excavation previously undertaken as part of the construction of the current facility. **Table 5** below illustrates the comparison between the Section Diagram submitted for the SSD and the revised building height as part of the RTS submission.

TABLE 5 BUILDING HEIGHT REDUCTION	
Section B-B submitted for SSD	Section B-B submitted as part of the RTS
	

The proposed development as amended is considered to present a well-resolved built form that is sympathetic to the residential character of the area. As illustrated in the Shadow Diagrams in **Figure 3**, Lytton Street Park will continue to receive a minimum of three hours of natural sunlight between 12pm and 3pm on winter solstice. The residential property to the south of the Site will also continue to receive adequate sunlight access.

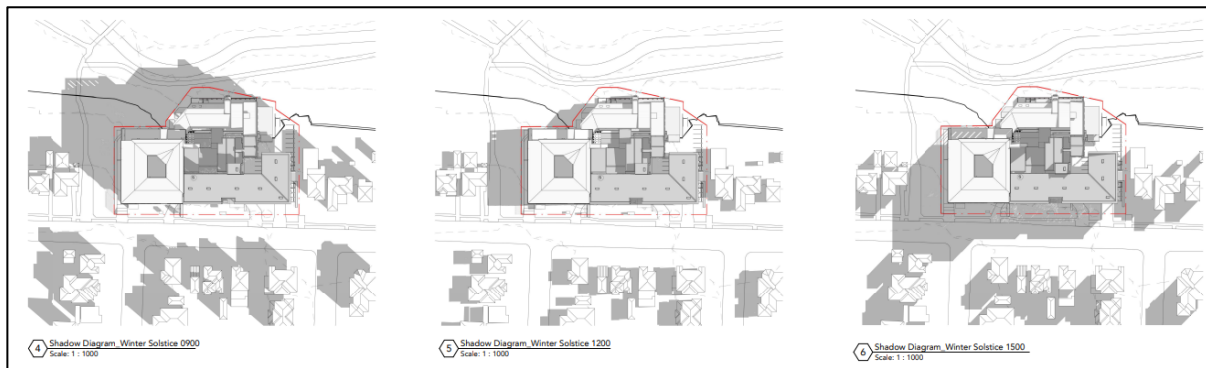


Figure 3 Shadow Diagrams on Winter Solstice (Team 2 Architects 2022)

Further justification for the revised building height is provided in the Clause 4.6 Variation Request at **Appendix C1**.



4.2.2 Signage

The proposed development as amended includes the installation of three pylon signs. The proposed pylon signs will 2.1m high and will be used for building identification and wayfinding purposes in response to DPE's comments. The proposed signs will be located at the front of the building along Lytton Street and will provide directions to the pedestrian entry of the building. The proposed development seeks approval for the location and indicative design of the signage. The design of the proposed signage will be further developed at detailed design stage. The location of the proposed pylon signs is illustrated in **Figure 4**.

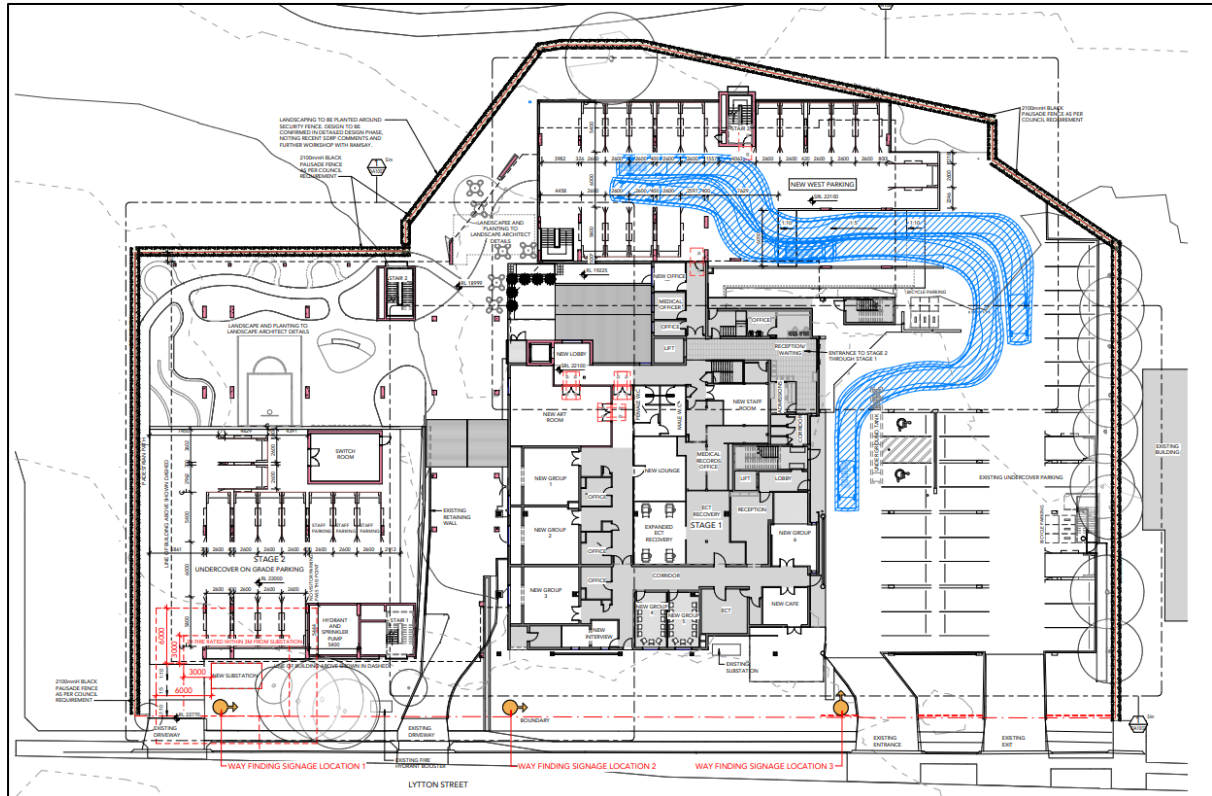


Figure 4 Location of three pylon signs along the Lytton Street frontage (Team 2 Architects 2022)

The indicative design of the proposed signage is illustrated in **Figure 5** below.

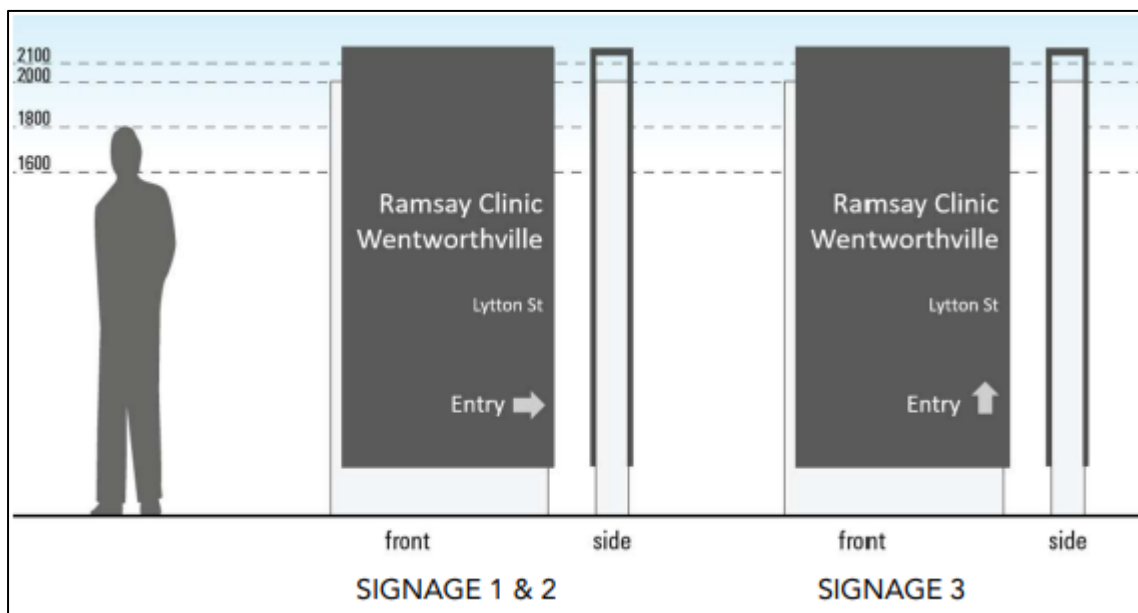


Figure 5 Indicative design of proposed signage (Team 2 Architects 2022)

4.2.3 Potential Public Art

The architectural and landscape design has been carefully considered to incorporate a number of significant pieces of public art, both at a tactile level in the landscaped paths and planting, and in the building where each of the three staircases offer the possibility of major installation created by local artists on a canvas nearly 3m wide by between 15m-20m high. An opportunity for public and indigenous art on the building is illustrated below:



Figure 6 Opportunities for public and indigenous art (Team 2 Architects 2022)

An example of this is the recently completed Dubbo Hospital car park where a similar technique was employed. This outcome was developed by Team 2 in conjunction with the local First Nation Community and has received widespread approval. A photo of the Dubbo Hospital car park with public art is illustrated in **Figure 7** for reference:

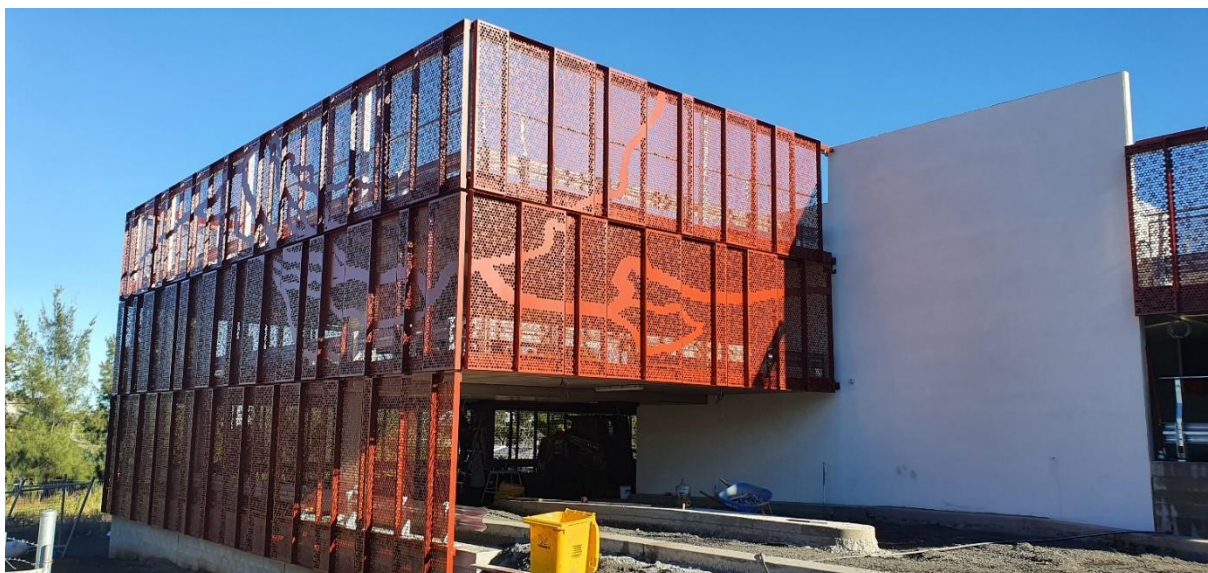


Figure 7 Dubbo Hospital Car Park (Team 2 Architects 2022)

4.3 LANDSCAPE

Upon review and consideration of the submissions, the following changes have been made to the landscape design:



- Increase in tree planting from 7 to 13 trees
- Deletion of access to the internal courtyard on Level 1 from patient rooms. Instead, access will be provided via the lounge room and corridor
- Addition of planter walls, planting beds and timber seating to increase the provision of landscaping in the Level 1 internal courtyard
- Details of landscaping along the Lytton Street streetscape, in the Level 1 inner courtyard, Level 2 and Level 3 courtyards added to the Landscape Strategy and Landscape Plans at **Appendix 4**

4.3.1 Proposed tree planting

In response to EES’ submission, additional tree planting has been incorporated into the landscape design, resulting in a total of 13 new trees. The location of the proposed trees is illustrated in **Figure 8** below.



Figure 8 Proposed Tree Planting (Arcadia 2022)

4.3.2 Level 1 Internal Courtyard and Hanging Garden

The design of the internal courtyard on Level 1 has been updated to increase the provision of planting beds, planter walls and timber seating. Access to the courtyard will be facilitated via the lounge room to the east and the corridor entry to the north. Access to the courtyard from the patient rooms has been deleted in response to the DPE submission. **Figures 9** and **10** illustrate the revised design of the Level 1 internal courtyard.



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480



Figure 9 Level 1 Internal Courtyard Masterplan (Arcadia 2022)



Figure 10 Level 1 Hanging Garden Section (Arcadia 2022)

4.3.3 Associated landscaping

Details of the landscape design on Lytton Street, in the Level 1 inner courtyard and Level 2 and Level 3 courtyards have also been included in the Landscape Plans and Strategy. The proposed landscape design in these areas is illustrated in **Figures 11-14**.



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

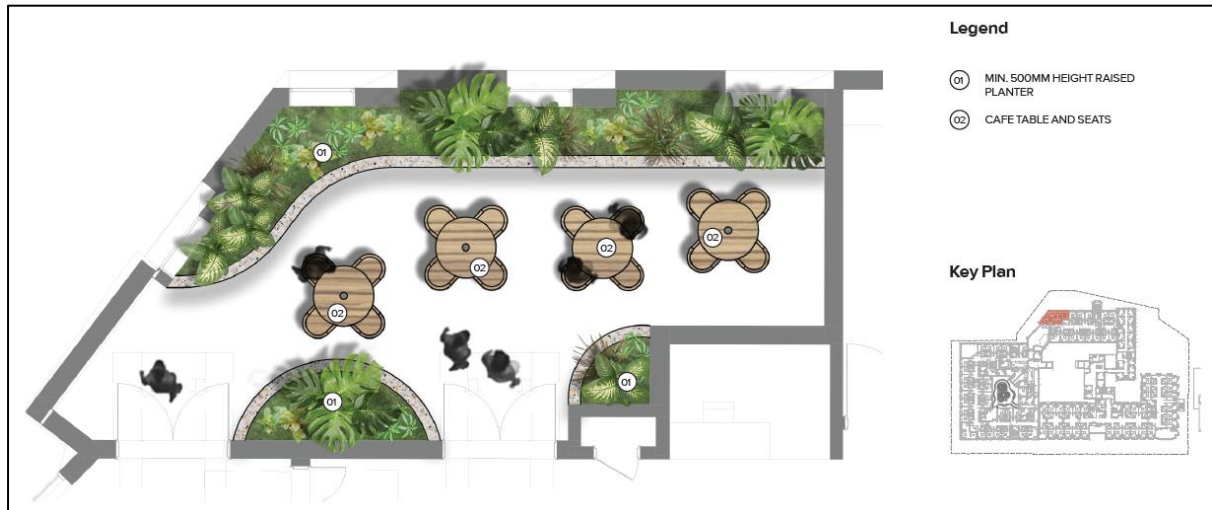


Figure 11 Level 1 Inner Courtyard Landscape Design (Arcadia 2022)

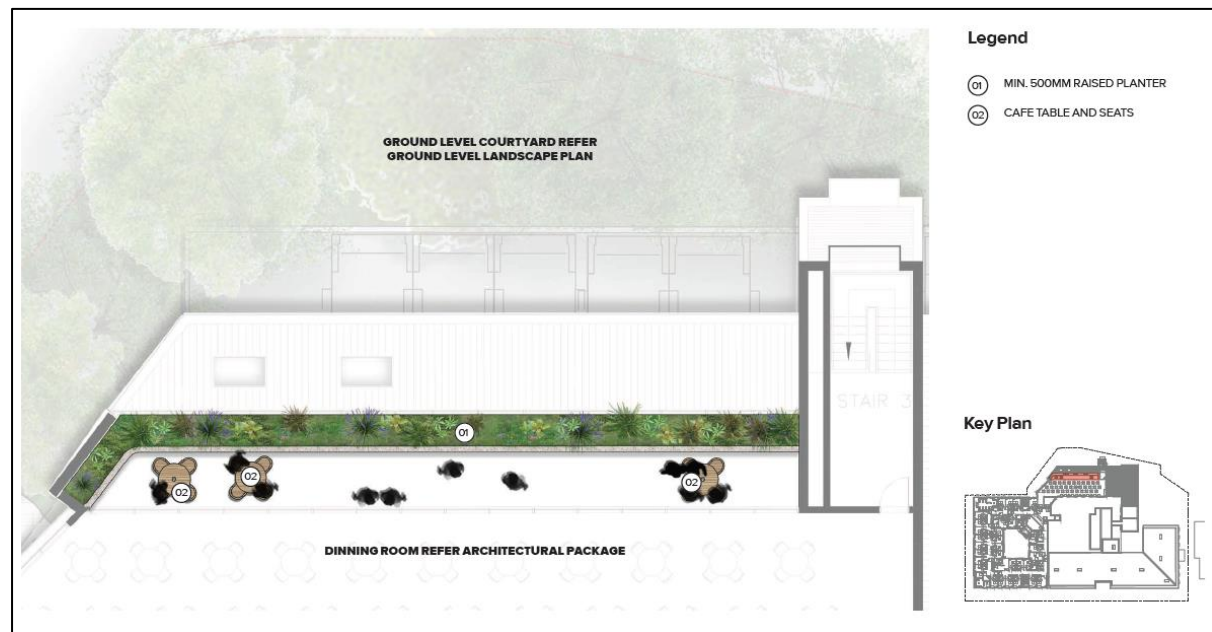


Figure 12 Level 2 Courtyard Landscape Design (Arcadia 2022)





Figure 13 Level 3 Courtyard Landscape Design (Arcadia 2022)



Figure 14 Lytton Street Streetscape Design (Arcadia 2022)



RESPONSE TO SUBMISSIONS REPORT

Proposed Extension of Wentworthville Northside West Clinic
 23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

4.4 STORMWATER DRAINAGE

The revised stormwater design includes a new pit and pipe alignment in response to Council’s submission to be entirely within the Site. One additional pit has been added with the design pipe size remains unchanged. The DRAINS results of the revised pipe layout are provided in Appendix B within the Stormwater Statement at **Appendix C7**, indicating the feasibility of the revised stormwater design. **Table 6** below illustrates a comparison between the pipe layout submitted for the SSD and the revised pipe layout.

TABLE 6 PIPE LAYOUT	
Pipe layout submitted for SSD	Pipe layout submitted as part of the RTS

4.5 VISUAL IMPACT

The Visual Impact Assessment (**Appendix C5**) has been updated to reflect the revised architectural design of the proposed facility. Given that the building height has been reduced as part of the amendment, the visual impact associated with the proposed development is considered to have improved. Nevertheless, the findings of the Visual Impact Assessment remain valid and the visual impacts assessed from multiple viewpoints surrounding the Site continue to be in the **none** to **moderate/low** ranges. This is mostly due to the proposal’s integration with the existing building and retaining the existing vegetation. Further details of the revised visual impact analysis are provided in the Visual Impact Assessment.



PART E PROJECT JUSTIFICATION

5.1 JUSTIFICATION

The proposed development is justified on environmental, social and economic grounds and is compatible with the locality in which it is proposed. The proposed development would enhance the subject site from an otherwise underutilised landholding to a productive health services facility.

This RTS Report seeks to provide an updated justification and evaluation, as required, for the proposal as a whole

5.1.1 Supports State, Regional and Local Planning Objectives

The proposed development is consistent with the objectives, provisions and vision contained within *A Metropolis of Three Cities – Greater Sydney Region Plan* (Greater Sydney Region Plan); the *Central City District Plan*; and the *Cumberland 2030: Our Local Strategic Planning Statement (LSPS)*. The proposal would contribute to the provision of specialised health care services in response to the emerging mental health needs of the local community and the wider Western Sydney.

For the purpose of the Greater Sydney Region Plan, Wentworthville is located in proximity to Greater Parramatta, which is identified as the core of the Central River City. As identified in the Plan, Greater Parramatta is one of the largest integrated health, research education and training precincts in Australia. The proposed development is considered to contribute to the provision of health services infrastructure in the Central River City and boost the role of the Westmead health and education precinct as an economic analyst for Greater Parramatta.

The proposal will facilitate the effective delivery of health infrastructure by providing excellent mental health care services and inpatient residential care which respond to the changing needs of the community, including mental and psychiatric illnesses and needs for rehabilitation services. Its location in proximity to the Wentworthville local centre would also enhance the accessibility for patients, visitors and workers to various health care facilities. Additionally, the proposal would also facilitate the co-location of health and social infrastructure which would deliver substantial public benefits and support the growth of Wentworthville as a local centre.

5.1.2 Demonstrates an Appropriate Use of a Permissible Development

The proposed development provides for the extension of the Wentworthville Northside West Clinic situated in a locality which has been identified to present opportunities for growth and development in jobs and housing under the LSPS. The Site comprises an existing health services facility which has been operated by Ramsay Health Care to offer high standards mental health care services and inpatient residential care in proximity to Wentworthville local centre. The proposal would provide additional capacity for the operation of the Clinic and continue to respond to the emerging demand for health care services in the locality.

The proposed development for the purposes of a health services facility is permitted with consent within the R4 High Density Residential zone under Part 2.3 Division 10 of the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP).

Furthermore, the proposal would build on the health services and infrastructure currently provided by the Clinic to facilitate the orderly and economic use and development of the Site without resulting in any unacceptable economic, environmental or social impacts.

Overall, the proposed development would be consistent and commensurate with Commonwealth, State, Regional and Local planning controls and objectives; the environmental characteristics of the Site; the surrounding context; and the principles of Ecologically Sustainable Development (ESD).



Accordingly, the Site is considered suitable for the proposed development and is consistent with the aims and objectives of the R4 High Density Residential zone, in that it seeks to provide mental health services which serve the emerging needs of the community and Western Sydney.

5.1.3 Minimises Environmental Impacts

Specialist consultants have assessed the potential impacts of the proposed development, determining that it could be undertaken with minimal environmental impacts. The commissioned reports have collectively concluded that no significant risk to the locality would result from the proposed development. Where impacts have been identified, these fully-developed strategies are set out in detail for mitigation. These measures have been revisited and updated where necessary, as addressed within **Appendix B** of this RTS Report.

5.1.4 Creates Compatibility with Surrounding Development

The proposed development is compatible with the residential land uses on adjacent lands, in that the proposed development would serve the mental health needs of the local community. The proposed facility has also been designed to respect the amenity of the surrounding residential properties through the incorporation of adequate separation and high quality landscaping. Detailed investigations undertaken, as part of this application, conclude that no significant environmental cumulative impacts, would occur from the proposed facility.

5.1.5 Delivers Ecologically Sustainable Development

The principles of ESD as outlined in Clause 7(4) of the EP&A Regulation have been carefully considered in the formulation of this proposal and are addressed as follows:

5.1.5.1 Precautionary Principle

After careful assessment by both the project team and specialist consultants, it is concluded that no unmanageable threat or irreversible damage to the environment, would result from the proposed development.

5.1.5.2 Inter-generational Equity

The project team and specialist consultants have examined the overall effects of the proposed development, on both the natural environment and the existing built environment within the vicinity of the subject site.

This development will not cause any significant impact on the health, diversity and productivity of the environment and will provide a community benefit in the form of increased access to health services and increased employment capacity.

The project will contribute positively to the community environment and add architectural interest to the area.

5.1.5.3 Improved Valuation, Pricing and Incentive Mechanisms

The proposal has been designed in accordance with the Green Star Design & As-Built v1.3 Rating System. Whole of Life considerations including running costs, long-term maintenance, quality, life-span, future improvement, value of money and sustainability, will be used to inform the design of the development. A Waste Management Plan will be implemented to cover the construction and demolition waste and operational waste.



5.1.5.4 Environmental Management

The proposed development implements significant and elaborate measures that avoid, contain and address any possible air-quality, noise, waste and pollution impacts, through avoidance, better design and management. This is exemplified through the following measures, which would be implemented throughout both the construction and operational phases of the proposed development:

- Noise mitigation measures;
- Waste management control practices;
- Erosion-and-sediment control; and
- Water sensitive urban design.

5.2 CONCLUSION

Based on the findings of the original EIS and further matters considered as part of this RTS, it is concluded that the proposed development is consistent with the Objects of the EP&A Act, under Section 1.3, particularly the notion of promoting the orderly and economic development of the land.

The proposed development is considered a quality outcome for an otherwise underutilised site. Additionally, in the promotion of employment-generating opportunities throughout the construction and operational phases, the proposed development further delivers on the rationale of full economic utilisation and proper and orderly development of the land for its intended purpose being health care services purposes.

The proposed development is suitable from both a local and regional context and is considered orderly and appropriate, based on social, cultural, economic and environmental matters.

Based on the specialist studies and extensive investigations carried out for the proposed development, the following conclusions are made:

1. **Strategic and Statutory Context** – The proposal aligns with the strategic planning framework, namely *A Metropolis of Three Cities* and the *Central City District Plan*. Consistency is achieved through the provision of health care services, employment, co-location of health and social infrastructure and implementation of sustainable development measures that contribute to create a new and leading-edge form of development.

In terms of the statutory context, the proposal is entirely consistent with the Objects of the EP&A Act. The appropriateness of the proposed development is also demonstrated through compliance with the CLEP2021 in that it achieves the objectives of the R4 zone with minimal impact on surrounding land uses.

2. **Suitability of the Site** – The subject site is highly suitable for the proposed development, as it comprises an existing health services facility which has been operated by Ramsay Health Care. The proposal will provide additional capacity for the operation of the facility and continue to respond to the emerging demand for health care services in the facility.
3. **Community and Stakeholder Engagement** – The EIS and supporting reports have been prepared in accordance with the matters prescribed by the SEARs. A comprehensive level of community and stakeholder engagement has been undertaken for the proposed development, which has continued through the RTS phase.
4. **Noise and Vibration** – Noise monitoring carried out and the project specific criteria established establishes that the proposed development can successfully co-exist with all surrounding land uses, subject to appropriate management and mitigation measures.



Construction noise and vibration is able to be suitably managed by way of conditions of consent and management plans.

- 5. Traffic and Transport** - Sufficient access and parking arrangements are provided as part of the proposed development, ensuring that there would be no undue impact on the surrounding road network. Further justification for the proposed parking provision has been provided by Traffix to demonstrate the parking arrangement of the proposed development.
- 6. Urban Design and Visual Assessment** - As clearly demonstrated in the submitted Architectural Plans, Landscape Concept Plan and Visual Impact Assessment the proposed development provides a suitable urban design outcome that reflects the existing locality.
- 7. Soils and Water** - The Subject Site is unconstrained in terms of geotechnical conditions and contamination and is therefore deemed suitable for the proposed development's land use. This is attributed to the underlying Site conditions and historical land use.

The proposed stormwater design has been designed in accordance with the relevant codes and standards. An overall net positive effect on the stormwater system in terms of overall conveyance and flood within Lytton Street is predicted for the development.

- 8. Infrastructure Requirements** - The proposed development seeks to ensure that future planned infrastructure can be accommodated to support the growth of the area and beyond.
- 9. Ecologically Sustainable Development** - The proposed development maintains its intent to achieve a high Green Star Rating by applying ESD principles.
- 10. Planning agreement / Development contributions** - The proposed development is subject to the Section 7.12 levy under the *Cumberland Local Infrastructure Contributions Plan*. Contributions will be paid prior to issue of the relevant construction stage to contribute to local amenities.

Given the above reasons and the satisfaction of both of the Objects of the EP&A Act and the aims of CLEP2021, it is recommended that the proposed development, for the purposes of an industrial food manufacturing facility, be supported subject to relevant and reasonable conditions.



**APPENDIX A
SUBMISSIONS
REGISTER**



SUBMISSIONS REGISTER

Proposed Extension to Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

SSD-17899480 - SUBMISSIONS REGISTER			
Group	Name	Matters	Addressed
Public authorities	DPE	Built Form and Height	Refer to Section 3.1 and Section 4.2 of this RTS Report and Appendix C1, C2, C3 and C4 .
		Noise	Refer to Section 3.1 of this RTS Report and Appendix C9 .
		Stormwater and Flooding	Refer to Section 3.1 of this RTS Report and Appendix C7 and C8 .
		Biodiversity and Landscaping	Refer to Section 3.1 and Appendix C4 of this RTS Report.
	EES	Biodiversity	N/A - no actions required.
		Impact to Trees	Refer to Section 3.1 and Appendix C4, C10 and C11 of this RTS Report.
		Flooding	Refer to Section 3.1 and Appendix C8 of this RTS Report.
	City of Cumberland Council	Development Standards	Refer to Section x and Appendix C1, C2 and C12 of this RTS Report.
		Land Use	Refer to Section 3.1 of this RTS Report.
		Council Pipeline/Easement	Refer to Sections 3.1 and 4.4 and Appendix C7 of this RTS Report.
		Flooding	Refer to Section 3.1 and Appendix C8 of this RTS Report.
		Stormwater Management	Refer to Section 3.1 and Appendix C7 of this RTS Report.
		Acoustic	Refer to Section 3.1 and Appendix C9 of this RTS Report.
		Land Contamination	Refer to Section 3.1 of this RTS Report.
	Waste Management	N/A - no actions required.	
	Parkland and Open Space	Refer to Section 3.1 and Appendix C2 of this RTS Report.	



SUBMISSIONS REGISTER

Proposed Extension to Wentworthville Northside West Clinic
 23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SSD-17899480

SSD-17899480 - SUBMISSIONS REGISTER			
Group	Name	Matters	Addressed
		Tree Management	Refer to Section 3.1 and Appendix C10 of this RTS Report.
		Exclusion of Application of Development Control Plans	Refer to Section 3.1 and Appendix C2 and C6 of this RTS Report.
	Heritage NSW	N/A	N/A - no actions required.
	Endeavour Energy	Network Capacity/Connection	N/A - no actions required.
	DPE Water	Predetermination	N/A - no actions required.
	TfNSW (RMS)	N/A	N/A - no actions required.
Public	Name withheld Wentworthville	Objection	Refer to Section 3.2 of this RTS Report.
	Name withheld Merrylands	Objection	Refer to Section 3.2 of this RTS Report.
	Lakshmi Balachandran	Objection	Refer to Section 3.2 of this RTS Report.



**APPENDIX B
UPDATED
MITIGATION
MEASURES**



PLANNED MANAGEMENT AND MITIGATION MEASURES FOR THE PROPOSED DEVELOPMENT

ADMINISTRATIVE COMMITMENTS

Commitment to Minimise Harm to the Environment

1. Ramsay Health Care would implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction or operation of the project.

Occupation Certificate for a Hospital

2. Ramsay Health Care would ensure a staged Interim and Final Occupation Certificate is obtained prior to the occupation of the hospital.

Terms of Approval

3. Ramsay Health Care would carry out the project generally in accordance with the:
 - a) Environmental Impact Statement;
 - b) Drawings prepared by Health projects International;
 - c) Management and Mitigation Measures;
 - d) Any Conditions of Approval.
4. If there is any inconsistency between the above, the Conditions of Approval shall prevail to the extent of the inconsistency.
5. Ramsay Health Care would ensure compliance with any reasonable requirements of the Secretary-General of the Department of Planning, Industry and Environment arising from the Department's assessment of:
 - a) Any reports, plans, programs, strategies or correspondence that are submitted in accordance with this Approval; and
 - b) The implementation of any recommended actions or measures contained in reports, plans, programs, strategies or correspondence submitted by the Project Team as part of the application for Approval.

Structural Adequacy

6. Ramsay Health Care would ensure that all new buildings and structures on the Site are constructed in accordance with the relevant requirements of the BCA.

Operation of Plant and Equipment

7. Ramsay Health Care would ensure that all plant and equipment used on Site is maintained and operated in proper and efficient manner, and in accordance with relevant Australian Standards.



MANAGEMENT AND MITIGATION MEASURES

Proposed Extension to Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

SPECIFIC ENVIRONMENTAL COMMITMENTS

Noise

9. Construction on the Site would only be undertaken between 7am and 6pm Monday to Friday, and 8am and 1pm on Saturdays. No work on Sundays and public holidays. The following specific measures are proposed throughout the construction and operational phases of development:
 - a) Prompt response to any community issues of concern;
 - b) Noise monitoring on-site and within the community;
 - c) Refinement of on-site noise mitigation measures and plant operating procedures where practical;
 - d) Preparation of a formal noise management plan including noise monitoring program;
 - e) For equipment with enclosures (i.e. compressor rooms) ensure door and seals are well maintained and kept closed when not in use;
 - f) Keep plant and equipment well maintained, regular inspection and maintenance of equipment to ensure it is good working order;
 - g) Equipment not to be operated until it is maintained or repaired;
 - h) Regularly train workers (i.e. toolbox talks) to use equipment in ways to minimise noise;
 - i) Operate mobile plant in a quiet, efficient manner;
 - j) Switching off vehicles and plant when not in use; and,
 - k) Incorporate clear signage at the Site including relevant contact numbers for community enquiries.
10. The acoustic screening should be 2.4m high acoustic screen (Class A hoarding or equivalent) and constructed from minimum 19mm thick plywood or similar mass surface, and be free of any air gaps.
11. Respite periods in accordance with Section 7.2.1 of the Noise and Vibration Impact Assessment prepared by JHA are to be implemented.

Construction Traffic

12. During construction:
 - a) all trucks entering or leaving the Site with loads have their loads covered;
 - b) trucks associated with the project do not track dirt onto the public road network; and,
 - c) the public roads used by these trucks are kept clean.

Dust Management

13. During the construction phase of the project, all reasonable and feasible measures to minimise the dust generated by the project. These include:

Source	Control Measures
General	
Visual Inspection	Carry out visual inspections of the Site during site preparatory / construction activities and employ measures where necessary to minimise any visible air pollution generated by the Project.
Regular Maintenance	Regularly inspect and perform maintenance on dust control technologies (i.e. water sprays nozzles) and measures to ensure the effectiveness of these controls.



MANAGEMENT AND MITIGATION MEASURES

Proposed Extension to Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

Erosion Control Structures	Silt and other material removed frequently from around erosion control structures to ensure deposits do not become a dust source.
Vegetated Buffers	Retain existing vegetation where appropriate and implement additional vegetated buffers around the boundary of the Site to provide act as a physical barrier to the transport of pollutants in the direction of sensitive receptors.
Waste Materials	Cleared vegetation, demolition materials and other combustible waste material should not be burnt on-site. All waste materials be appropriately contained (in skips, bins) and covered during adverse weather conditions and handled in accordance with the Site's Waste Management Plan.
Wind Blown Dust Sources	
Disturbed Areas	<ul style="list-style-type: none"> - Disturb only the minimum area necessary. - Stabilise all disturbed areas as soon as practicable to prevent or minimise windblown dust. - Regularly assess weather conditions to identify adverse weather conditions that are unfavourable in terms of dust levels at receptor locations surrounding the Site.
Stockpile/s	<ul style="list-style-type: none"> - Water sprays and/or covers would be employed for material stockpiles, particularly during adverse weather conditions, to minimise dust generation. - Stockpiles would be covered overnight. - Use of chemical dust suppressants would also be used where necessary. - Fencing, bunding or shelterbelts used to reduce ambient wind speeds (in some areas).
Transportation (Trucks)	<ul style="list-style-type: none"> - Truck loads covered with tarpaulin or lid prior to transport of dusty materials by road. - Minimise truck queuing and unnecessary trips through logistical planning of materials delivery and work practices. - Reduce vehicle / truck idling times. - Maintain a following distance of trucks of 20 seconds minimum to allow for dust clouds generated by the lead truck to dissipate. - Install a truck wheel wash or shaker grid to remove any loose dirt.
Activity Generated Dust Sources	
Internal Road Dust	<ul style="list-style-type: none"> - Roads and trafficked areas would be watered down using a watercart and/or sprinkler(s) to minimise the generation of dust. - Haulage vehicles would be restricted to the most direct route and minimal manoeuvring areas to prevent indiscriminate driving over non-active areas. - Haul roads and hard stand areas will have designated speed limits (i.e. generally 20 km/hour). - Enforce speed limits on all on-site vehicles to minimise wheel-generated dust. - Stabilise access roads and work areas as soon as practicable to prevent or minimise windblown dust. - Maintain roads on a regular basis to ensure roads are clearly marked, potholes and corrugations are eliminated, and extra material build up is removed or redistributed on the road. - Chemical dust suppressants used where necessary.



MANAGEMENT AND MITIGATION MEASURES

Proposed Extension to Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

External Road Dust	<ul style="list-style-type: none">– Vehicles causing dirt track out onto main roads would be cleaned up on a regular basis to prevent this becoming an additional source of dust.– Material spillages would be cleaned up promptly.
Excavation	<ul style="list-style-type: none">– Apply water sprays to trucks and loading points for dust suppression.
Loading and Dumping	<ul style="list-style-type: none">– Dump heights would be minimised wherever possible (reduce to 5 m).
Plant and Equipment	<ul style="list-style-type: none">– All plant and equipment used during activities would be maintained and operated in a proper and efficient condition.– Reduce idling times of trucks and other machinery.– Fixed plant should be located as far from local receptors as possible.
Excessive Dust Events	
Internal Roads	<ul style="list-style-type: none">– Employ additional water spraying / water carts.– Further reduce speed on haul roads during high winds.– Halt traffic movements.
Stockpiles	<ul style="list-style-type: none">– Cover stockpiles of material.
Project Site	<ul style="list-style-type: none">– Temporarily halt activities and resume once weather conditions have improved.

Tree Preservation

14. All tree protection works shall be carried out before excavation, grading and site works commence. Tree protection works shall be inspected and approved by a Consulting Arborist meeting AQF Level 5 prior to construction works commencing.
15. Storage of materials, mixing of materials, vehicle parking, disposal of liquids, machinery repairs and refueling, site office and sheds, and the lighting of fires, stockpiling of soil, rubble or any debris shall not be carried out within the TPZ of existing trees. No backfilling shall occur within the TPZ of existing trees. Trees shall not be removed or lopped unless specific instruction is given in writing by the Superintendent.
16. Prior to all site works commencing, a Site Arborist is to be appointed with the responsibility of implementing all Tree Protection Measures in this report as well as compliance with AS4970-2009 Protection of Trees on Development Sites. The Site Arborist is to hold qualifications equivalent of AQF Level 5.
17. All tree protection and removal works are to be undertaken in accordance with the recommendations and tree protection measures in the Arboricultural Development Impact Assessment Report (dated 22 June 2022) prepared by Birds Tree Consultancy.

Waste Management

18. Ramsay Health Care would ensure that all waste generated on site during operation is classified in accordance with the Office of Environmental and Heritage's *Waste Classification Guidelines: Part 1 Classifying Waste* and disposed of to a facility that may lawfully accept the waste.
19. Consider measures and performance-based targets for reduction, reuse and recycling options.

Protection of Vegetation



MANAGEMENT AND MITIGATION MEASURES

Proposed Extension to Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

20. Ramsay Health Care would mark the clearance boundaries prior to commencement of construction to ensure that there is no unnecessary removal of vegetation.

Noise and vibration

21. If, during construction, an item of equipment exceeds either the noise criteria at any location or the equipment noise level limits, the following noise control measures, together with construction best practices, shall be considered to minimise the noise impacts on the neighbourhood.
- Schedule noisy activities to occur outside of the most sensitive times of the day for each nominated receiver.
 - Consider implementing equipment-specific screening or other noise control measures recommended in Appendix C of AS 2436:2010.
 - Limit the number of trucks on Site at the commencement of Site activities to the minimum required by the loading facilities on Site.
 - When loading trucks, adopt best practice noise management strategies to avoid materials being dropped from height into dump trucks.
 - Avoid unnecessary idling of trucks and equipment.
 - Ensure that any miscellaneous equipment (extraction fans, hand tools, etc) not specifically identified in the CNVMP incorporates silencing/shielding equipment as required to meet the noise criteria.

Aboriginal Heritage

22. During works, Ramsay Health Care would notify the NSW Office of Environment and Heritage should an Aboriginal site and/or object be recorded in the Aboriginal Heritage Information Management System (AHIMS).
23. Unexpected Aboriginal objects remain protected by the National Parks and Wildlife Act 1974. If any such objects, or potential objects, are uncovered in the course of the activity, all work in the vicinity should cease immediately. A qualified archaeologist should be contacted to assess the find and Heritage NSW and Deerubbin LALC must be notified.
24. If human remains, or suspected human remains, are found in the course of the activity, all work in the vicinity should cease, the Site should be secured, and the NSW Police and Heritage NSW should be notified.

Ecologically Sustainable Development

25. Ramsay Health Care would investigate the following ESD measures in respect of:
- a) Energy & Greenhouse Gas Emissions;
 - b) Potable water reduction;
 - c) Minimising waste to landfill;
 - d) The Indoor Environment;
 - e) Occupant amenity and comfort;
 - f) Land Use & Ecology;
 - g) Emissions; and
 - h) Building Management

Contamination



MANAGEMENT AND MITIGATION MEASURES

Proposed Extension to Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

26. A contaminated land professional should be consulted with should any unexpected finds concerning stained or odorous material be uncovered during the demolition and construction phases of development.
27. Remediation is to be undertaken in accordance with the Remediation Action Plan and Asbestos Management Plan prepared by JK Environments.

Geotechnical

19. Site preparation and filling should be carried out in accordance with the guidelines contained in AS 3798 - 2007.
20. All excavated materials which are to be removed off the Site will be disposed of in accordance with the provisions of the current legislation and guidelines including the Waste Classification Guidelines (EPA, 2014).

Building Code of Australia

21. All new buildings will be designed to comply with the BCA standards.

Accessibility

22. Ramsay Health Care would ensure at the Construction Certificate stage compliance with Part D3 BCA standards.



APPENDIX C
SUPPORTING
INFORMATION

