



ACN: 146 035 707 ABN: 54 146 035 707
Suite 4, Level 7, 100 Walker Street
North Sydney NSW 2060
P: 02 9929 6974
enquiries@willowtreeplanning.com.au
www.willowtreeplanning.com.au

Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW, 2124

Attention: Teresa Gizzi – Team Leader, Regional Assessments

RE: SSD-10159 – NORTHSIDE PRIVATE HOSPITAL, WEST GOSFORD

PROPERTY AT FAUNCE STREET WEST, WEST GOSFORD (LOT 2 DP1226923)

Dear Teresa,

This letter provides additional information to inform the assessment of SSD-10159 relating to the proposed development of Northside Private Hospital at Faunce Street West, West Gosford (Lot 2 DP1226923).

Specifically, this additional information letter responds to the letter from the Department of Planning, Industry and Environment (DPIE) dated 9 December 2020. It is considered that the assessment carried out and the additional information contained within this letter and its appendices, adequately address the matters that have been raised.

In relation to comments raised by DPIE, a response to each of the matters raised is provided in **Table 1** below.

Table 1 Response to DPIE's comments	
Matters raised	Response/comments
<i>Faunce Street Front Setback Area</i> <i>The Department notes a large section of the Faunce Street setback area, being the area adjacent to the substation, contains no setback plantings, has no active frontage, presents only blank recessed facades set below street level and would have a significant change in level from the footpath area.</i> <i>The Department considers this part of the frontage may not meet the objectives for front setbacks under the Gosford DCP to provide landscape and deep soil zones in appropriate locations and provide for high quality pedestrian amenity and activity.</i> <i>The Department requests further information in order to assess the impacts of this part of the development on the streetscape, pedestrian amenity and safety,</i>	The following controls of Clause 5.2.12 <i>Building services and the streetscape</i> have been reviewed and addressed below: <i>Controls</i> <i>1. Substations must be provided wholly within the subject site, either internal to the development or suitably located and integrated within the architectural or landscaping design. Substations are to be designed in accordance with Ausgrid's requirements for distribution substations which are set out in their network standards NS117 and NS141 for kiosks, and NS113 and NS114 for chambers (or as updated from time to time). Substations within the street will not be accepted.</i> The substation is located wholly within the subject site and internal to the development as required by the control above. Appropriate clearance and access to the substation is provided as required by the relevant standards. <i>2. Building entries, building services including fire services and parking and servicing locations should all be treated with high quality materials. Materials used to treat the external facade should 'turn in' and continue</i>

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<i>including a cross section as well as visualisations / photomontages of this part of the site.</i> ▪ <i>Consideration should be given to improvements to the design, including incorporation of setback landscaping and a more natural change in level from the footpath.</i>	<i>at least 3m into vehicular entry locations.</i> The substation is required to be treated with louvres for appropriate ventilation. The proposed material palette of the development contains smooth and ribbed concrete, terracotta cladding and sandstone. Exposing this area of aluminum louvres in a more visible area would deduct from the holistic materiality and character of the development. We therefore feel that locating the substation in its current location, partially sunken beneath ground level, is the most appropriate response. <i>3. Ground floor substations are preferred to simplify substation access and avoid the need for forced ventilation. Ausgrid will only permit a basement substation by exception when there are no technically viable alternatives.</i> The substation is located on ground floor. This location was chosen to ensure maximum usable space for public and private uses of the development are utilised, such as retail spaces and support being accessed from the colonnade along the north-eastern aspect through to the south-western aspect of the development. Due to the natural slope of the topography along Faunce Street, this location is the most suitable for services, as the sunken nature of the area and southern facing aspect would provide undesirable amenity to any type of usable retail space or the like. The proposed location of the substation meets both objectives and controls of Clause 5.2.12. The high quality streetscape is maintained by ensuring that usable retail and support spaces are accessed from the north-eastern to south-western aspect of the development, reserving the southern partially sunken area of the development is allocated for this major building services in order to minimise intrusion on the public domain. Finally, an email was received from Trent Wink (Senior Planner) on 1 July 2020 outlining matters raised in the CoGDAP meeting on 26 June 2020 which states amongst other matters: • <i>Increase activation to Faunce St;</i> • <i>Improve the eastern edge of the building and along Faunce Street in the area allocated to services including the substation and oxygen bottles;</i> A full suite of Architectural Plans was then provided to the CoGDAP who stated within their letter (Ref: SF20/53036): <i>As per the detailed development plans the ground level connections from the public domain to the building and integration of landscape in both stages have improved significantly. The Faunce Street entry is significantly improved, the awning and step in the building provides a clear entry to the building. The entry to loading dock</i>

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	<i>has been well resolved and is now supported. Landscape works are well integrated into the built form and provides enclosure to roof top space and some good spaces at the entrances to the building. The Panel has not reviewed the adequacy of the proposed plant species, but supports the scale of plantings.</i> In summary, the proposed planter and the assessment against the Clause 5.2.12 <i>Building services and the streetscape</i> is considered to adequately address the DPIE's comments. Notwithstanding the above, included a planter to the lower side of the fence with some climbers to provide a green edge along the footpath. Substation sections and 3D images are provided at Appendix 1 and a Landscape Plan and Landscape Plan Addendum is provided at Appendix 2.
Flooding ▪ <i>Provide additional information to address the concerns raised by the Department's Biodiversity and Conservation Division in relation to flood management.</i> ▪ <i>In this regard, the Department has outstanding concerns as Council's mapping indicates the site is affected by the 1% AEP flood and the PMF and therefore further information is required in order to address Clauses 7.2 or 7.3 of the Gosford SEPP.</i> ▪ <i>The Department requests the Applicant to consult Council to resolve this issue given the findings of GRC Hydro's review of the Narara Creek Flood Study. Depending on the advice from Council, the Department may require further information to address this issue and the requirements of the Gosford SEPP.</i> ▪ <i>Provide additional information in relation to overflow of the OSD, and erosion and sediment controls for dispersible soils as raised by the Biodiversity and Conservation Division.</i>	An Overland Flooding Report has been prepared by GRC Hydro and is attached at Appendix 3. Further, please note that we sought confirmation from Council that an Overland Flow Study would address the comments raised. The Report states that it is reasonable to conclude that the Site for all intents and purposes the site is flood free given depths in the 1% AEP event are less than 0.1m as identified within the Overland Flood Report. Therefore, the proposed development is considered to satisfy Clause 7.2 and 7.3 of SEPP GCC as the Site is considered to be flood free and would not impact flood behaviour or impact nearby properties.
Road on Lot 2 ▪ <i>Provide an updated plan of subdivision to create a right of carriageway over the proposed road on Lot 2 (or amend the plan</i>	A Draft Plan of Subdivision has been prepared and has been attached at Appendix 4. The Draft Plan of Subdivision was provided in accordance with the issued SEARs on 5 April 2019. A right of carriageway for the

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<i>to include the road within the site).</i> <i>Provide details of a positive covenant (or provide alternative arrangements) to ensure the roadway and the landscaping on Lot 2 adjacent to the loading area will be maintained in good condition and in accordance with the approved plans in perpetuity.</i>	access and a positive covenant for the associated landscaping located on Lot 2 may form a condition of consent. The formal subdivision of Lot 1 and Lot 2 would be subject of a separate application which would include the subdivision of the Lots 1 and 2 including the relevant right of carriageway and positive covenants. We recommend that this condition be implemented prior to the issuance of an Occupation Certificate to ensure legal access to the site.
Acid Sulfate Soils <i>In accordance with Clause 7.1 of the Gosford SEPP, provide an assessment as to whether 'the works are likely to lower the water table on the adjoining Acid Sulfate Soils (ASS) land by more than 1 metre' (noting the works are within 500m of Class 1-4 land and works are below 5m AHD). Should the assessment find the water table is likely to be lowered, additional requirements under clause 7.1 of the Gosford SEPP are required to be met. The ASS assessment in the Detailed Site Investigation does not address these requirements of Clause 7.1</i>	A Groundwater Investigation and Dewatering Management Plan has been prepared by Douglas Partners and is attached at Appendix 5. The Groundwater Investigation and Dewatering Management Plan has assessed the effect of the proposed development on Acid Sulfate Soils and states: <i>The groundwater table drawdowns simulated for the end of the construction work (Drawing 3 and 4) are not expected to be impacting areas with potential acid sulfate soils, with the 0.5 m contour located at approximately 60m from the nearest area with anticipated high occurrence.</i> As such, the investigations contained with Groundwater Investigation and Dewatering Management Plan confirm that an Acid Sulfate Soils Management Plan is not required in accordance with Clause 7.1(4) of the SEPP GCC.
Ground Water <i>While the site investigation considers potential ground water contamination of specific nearby ground water bores, there has been no analysis of any impacts to ground water flows generally or potential impacts to the nearby wetland. Given the proposed basement will encounter the groundwater table, further information is required on the likely impacts of the development for groundwater flows in the vicinity of the site as well as consideration of any potential impact to the nearby coastal wetland, noting hydrological impacts are a matter for consideration under the Coastal Management SEPP.</i> <i>Additional Information is also required to address the matters raised by DPIE Water, including:</i> <i>A detailed and</i>	A Groundwater Investigation and Dewatering Management Plan has been prepared by Douglas Partners and is attached at Appendix 5.

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<i>consolidated site water balance.</i> ○ <i>An assessment against the NSW Aquifer Interference Policy 2012.</i> ○ <i>An estimate of the groundwater take.</i>	
Construction Staging and Noise <i>Provide an updated acoustic assessment or a further acoustic assessment which considers the potential impacts of construction noise during the construction of Stage 2 following commencement of operation of Stage 1. In particular the assessment should demonstrate how the requirements of the Interim Construction Noise Guideline (ICNG) could be met and the amenity of patients ensured given the recommended noise management levels for hospital wards and operating theatres under the ICNG.</i>	The proposed Stage 2 is a concept proposal and as such would be subject to a future Development Application. Any future Development Application would be required to be supported by an Acoustic Assessment and preliminary construction management plan. Extensions to existing hospitals are not uncommon and can be managed to ensure that the hospital remains operating. Furthermore, a detailed construction management plan for Stage 2 can form a condition of consent of the future Development Application. It does not seem to be the appropriate time to address detailed construction methods of a concept proposal. Please note that Section 4.22(5) of the EP&A Act states: <i>(5) The consent authority, when considering under section 4.15 the likely impact of the development the subject of a concept development application, need only consider the likely impact of the concept proposals (and any first stage of development included in the application) and does not need to consider the likely impact of the carrying out of development that may be the subject of subsequent development applications.</i> As such, it is clear that an Acoustic Assessment and Construction Management Plan would be best assessed as part of any future Development Application for Stage 2. Notwithstanding the above, an updated Preliminary Construction Management Plan has been attached at Appendix 6 and outlines measures that may be implemented as part of any Stage 2 construction to minimise noise impacts (e.g. acoustic hoardings) and also notes that an Acoustic & Vibration Assessment would be required as part of any subsequent Development Application.

This letter and supporting appendices have responded to DPIE's request for additional information and demonstrated the suitability of the site and proposed development.

It is therefore considered that the information contained in this letter and its appendices will satisfy the DPIE's request for additional information to inform the assessment, and favourable determination of the subject State Significant Development Application.

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Yours sincerely,



Lewis McAulay
Associate
Willowtree Planning Pty Ltd

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APPENDIX 1 – Substation Sections and 3D Images

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APPENDIX 2 – Landscape Plan

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APPENDIX 3 – Overland Flood Study

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APPENDIX 4 – Draft Plan of Subdivision

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APPENDIX 5 - Groundwater Investigation and Dewatering Management Plan

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APPENDIX 6 - Preliminary Construction Management Plan