

11 November 2020

218264

Mr Jim Betts
Secretary
NSW Department of Planning, Industry and Environment
Locked Bag 5022,
Parramatta NSW 2124

Attn: Megan Fu, Principal Planner

Dear Mr Betts,

SSD10389 – LIVERPOOL HOSPITAL INTEGRATED SERVICES BUILDING RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

On behalf of the applicant, Health Infrastructure, this submission has been prepared by Ethos Urban in response to the Department of Planning, Industry and Environments (the Department) Request for Additional Information dated 13 October 2020 regarding the State Significant Development Application (SSDA) for the construction and operation of a new integrated services building at Liverpool Hospital (SSDA10389).

This submission also provides a response to the agency submissions received from Liverpool City Council, Heritage NSW, Transport for NSW and the Environment, Energy and Science Group and provides further information and clarification as requested.

The submission should be read in conjunction with the following:

- Response to Request for Additional Information and Agency Submissions prepared by Ethos Urban (**Attachment A**);
- Amended Architectural Plans prepared by Fitzpatrick and Partners (**Attachment B**);
- Additional Overshadowing Analysis prepared by Fitzpatrick and Partners (**Attachment C**);
- Amended Landscape Plans prepared by Clouston (**Attachment D**);
- Amended Acoustic Report prepared by Acoustic Logic (**Attachment E**);
- The original Environmental Impact Statement (EIS) prepared by Ethos Urban (including appendices and dated 8 May 2020); and
- The Response to Submissions and Additional Information prepared by Ethos Urban (including appendices and dated 9 September 2020).

A detailed discussion on the key issues raised is provided below.

1.0 Overshadowing

In their correspondence, DPIE has sought clarification regarding overshadowing and solar access to adjoining properties along Goulburn Street during mid-winter as a result of the proposed development.

In response, an additional overshadowing analysis has been prepared by Fitzpatrick and Partners and is included at **Attachment C**. The analysis shows the impact of overshadowing to properties located on Goulburn Street from 9am to 11:30am (on 21 June) at 15 minute increments. An overview of the potential impact to individual properties is provided in **Table 1**.

Table 1 Goulburn Street – 21st June solar access analysis

Goulburn Street property	Impact	Solar access received from	2 hours solar access achieved	Identified for Demolition for Private Hospital
49 Goulburn Street, Liverpool	<ul style="list-style-type: none"> No impact 	9am	✓	-
51 Goulburn Street, Liverpool	Non-residential building – not applicable			-
53 Goulburn Street, Liverpool	<ul style="list-style-type: none"> Shadow on eastern façade – no living spaces affected. 	9:30am	✓	-
55 Goulburn Street, Liverpool	<ul style="list-style-type: none"> Shadow on eastern façade – no living spaces affected as the primary living areas face north and south. From 9:30am no impact from the LHAP. 	9:30am	✓	-
61 Goulburn Street, Liverpool	<ul style="list-style-type: none"> Impact on apartments at all levels from 9:00am. From 9:15am all living spaces partially affected from the existing building (55 Goulburn Street). At 9:15am no impact from LHAP on apartments facing north. At 9:30am impact to 1st and 2nd floor apartments facing east. No impact on any apartments from 9:45am. <p>Note: Apartments facing north receive no direct sunlight due to close proximity of the existing building (55 Goulburn Street).</p>	9:45am	Minor reduction to 1 st floor apartments facing east. Solar access is likely to be received from 9:45am to 11:30am to apartments on the 1 st floor.	✓
63 Goulburn Street, Liverpool	Previous dwelling currently leased as a warehouse			✓
69 Goulburn Street, Liverpool	<ul style="list-style-type: none"> LHAP impact on 1st and 2nd floor apartment at 9:00am. At 9:15am all apartment have access to direct sunlight and the LHAP will only impact 1st floor balconies. From 9:30am no impact from the LHAP. 	9:30am	✓	✓
71 Goulburn Street, Liverpool	<ul style="list-style-type: none"> LHAP impact on 1st floor apartment at 9:00am. At 9:15am all apartment have access to direct sunlight and the LHAP will only impact 1st floor balconies. From 9:30am no impact from the LHAP. 	9:30am	✓	✓
73 Goulburn Street, Liverpool	No impact	9am	✓	-

Source: Fitzpatrick and Partners / Ethos Urban

As illustrated **Table 1** and at **Attachment C**, the proposed development has had regard to the requirements of the Apartment Design Guide. Except 61 Goulburn St all dwellings receive 2 hours of sunlight.

The proposed development will result in some additional overshadowing from 9:00am to 9:45am at 61 Goulburn Street. Impacts vary depending on the floor a unit is located and it is noted the ground floor is used for parking only. It is noted that:

- 61 Goulburn St - Depending on the level, units that face Goulburn St will receive solar access from 915/930 – 945 until up until approximately 11:30am. This means that solar access ranges from greater than 2 hours to approximately 1 hour 45 mins.
- All remaining units of 61 Goulburn St are substantially shadowed by 55 Goulburn St and do not achieve 2 hours of sunlight. While the building has not been surveyed, the model suggest that units behind the units facing Goulburn St receive between 15 minutes -30 less sunlight as a result of the proposal.

Therefore, shadow cast onto adjoining development along Goulburn Street is limited to the very early morning period and a large proportion of these properties will enjoy adequate sunlight across the remainder of the day.

It should also be noted that a SSDA is currently being prepared for 61-71 Goulburn Street, Liverpool for the construction of a new 8 storey mixed use development comprising a Private Hospital (SSDA 10430). Therefore, while the proposed development will result in some additional overshadowing it is considered to be negligible given these buildings are subject to future redevelopment under SSDA10430.

It is also noted that the subject dwellings are located in Liverpool City Centre, land zoned B4 Mixed Use and are within land identified for renewal as part of the Liverpool Innovation Precinct. Accordingly, the extent of shadowing is minor and appropriate in the context of the proposal.

2.0 Heritage

A response to the Heritage NSW submission is included at **Attachment A**. It is noted that an Archaeological Research Design and Excavation Methodology (ARD) is currently being prepared by RPS and it is requested that DPIE include a condition requiring the ARD to be submitted post approval. The ARD will provide a guideline on the archaeological programme and methodology in accordance with the NSW Heritage submission.

3.0 Campbell Street Shared Zone

The project aims to minimise vehicular traffic in Campbell Street to facilitate pedestrian connection between Liverpool Hospital and the proposed Education and Research Hub building and the broader education and research zone to the north of Campbell Street in accordance with the Liverpool Innovation Precinct Land Use Strategy. The expectation is that traffic will find an alternate route, as assessed in the Transport and Accessibility Impact Assessment prepared by GTA Consultants.

Council has suggested that the views of TfNSW and the local schools have not been taken into consideration however, TfNSW reviewed the proposal and responded in writing to DPIE on 6 July 2020 and 30 Sep 2020. The TfNSW review includes internal consultation with Infrastructure and Services, who are responsible for the respective bus contract region. Health Infrastructure has consulted with both High Schools over the past 12 months in relation to the whole LHAP redevelopment. Consultation to date has included specific discussions in relation to the Campbell Street proposal including traffic impacts, pick-up/ drop-off arrangements and bus services. Both schools have expressed support for the proposal and there is no evidence that there is otherwise any concern from either TfNSW or the High School..

Please note that the pedestrianisation of Campbell Street is fundamental to achieving the vision of the Liverpool Innovation Precinct (LIP), promoting investment and employment in Liverpool

A workshop was held with Council officers on 3 August 2020 to discuss the Campbell Street Shared Zone proposal and associated works. Council indicated in-principle support for the Shared Zone and change in priority at the Lachlan Street/Forbes Street intersection, subject to investigation of kerb extensions to improve pedestrian safety and detailed design resolution as part of the Section 138 approval required prior to commencement of the road works. It is expected that the S138 process will require the design to be reviewed via Council's Traffic Committee which includes Council and TfNSW in any event, ensuring the outcome sought by Council is achieved.

It is proposed that a condition of consent should be included to this end:

While the shared zone concept is approved, the detailed design must be submitted to Council for further review by Council's Traffic Committee and subsequent approval as part of a Section 138 application under the Roads Act.

The Section 138 will be submitted to Council for approval and additional SIDRA modelling analysis and detailed design changes will be required in accordance with the requirements of Council as part of that process.

4.0 Out of Hours Works

We clarify that the Saturday out of hours 1pm-3pm is proposed to be 1pm-5pm. An amended Acoustic Report is provided at Attachment D to reflect this.

5.0 Conclusion

We trust that the responses will enable the Department to finalise their assessment of the SSDA. Given the environmental planning merits (and the ability to suitably manage and mitigate any potential impacts) and significant public benefits proposed, it is requested that the application be approved.

Yours sincerely,



Chris McGillick
Principal
+61 4 1104 7748
cmcgillick@ethosurban.com