

25 March 2020

Department of Planning and Environment

**Submission on Northside Private Hospital, West Gosford Application No SSD-10159**

Dear Sir/Madam

This submission is presented on behalf of Friends of Gosford Pty Ltd. We thank you for the opportunity to present a submission on the Northside Private Hospital, West Gosford Application No SSD-10159. In respect to this application we wish to make the following comments.

We understand this application has been made under *State Environmental Planning Policy (Gosford City Centre) 2018 (SEPP GCC)*. As noted on page 9 of the Environmental Impact Statement (EIS) prepared by Willow Tree Planning dated September 2019 the proposed development significantly exceeds the height and floor space ratio (FSR) controls allowable for the under SEPP GCC.

We appreciate that in accordance with Clause 8.4(4) of SEPP GCC that a consent authority can vary the building height and FSR subject to specific criteria. However, the criteria are limited to site area, building design supported by the design review panel, building sustainability and environmental performance.

As the assessment criteria for allowing significant variations to height and FSR is limited we request the Department of Planning judiciously evaluate the proposal in accordance with sections 4.15(1)(b) and 4.15(1)(e) of the *Environmental Planning and Assessment Act 1979*. Our rationale for making this request is because the limited criteria for varying building height and FSR does not address the local built environment and the public interest.

Of particular concern relating to the built environment is the location and scale of the proposed development in such close proximity to large traffic generating activities of Gosford Railway Station, Gosford Hospital, Gosford High School, Henry Kendal High School, Gosford Primary School and Gosford Racecourse. This has multiple implications.

The first implication is the number of traffic generating activities impacting traffic along Racecourse Road and the railway bridge at Etna Street. We believe the traffic report has a significant oversight in that it only identified three (3) key intersections of the Central Coast Highway with Racecourse Road,

Racecourse Road with Faunce Street West and Faunce Street West with Showground Road. In our opinion the most significant intersections with traffic implications are the intersection of Racecourse Road with Showground Road, Etna Street Railway Bridge and the intersection of Mann Street with Etna Street which are illustrated in the accompanying aerial photo.



Personal experience of attempting to travel along Racecourse Road from the Central Coast Highway to Etna Street railway bridge has resulted in extensive delays. Reviewing both the EIS and the Traffic Assessment Report these documents have not addressed the current traffic delays and the implications of the proposed private hospital.

Please note in our opinion the traffic movement across Etna Street railway bridge is a matter of significant public interest. Until the consent authority has a full understanding of the implications of traffic movement along the full length of Racecourse Road and Etna Street, we believe the determination of this application should be deferred.

If deferring the application, we suggest the Department of Planning request the applicant consider the implications on traffic movement along Racecourse Road and Etna Street. If the Department were to request clarification from the applicant on this oversight, we would request that the applicant be requested to consider the traffic implications if the State Government were to consider an alternative east west/north south road bypass around the Gosford City Centre.

A proposed east west / north south road bypass around the Gosford City Centre is presented in Appendix A.

The second implication is the concern of the number of carparking spaces provided on-sight. It is noted the applicant has used the car parking provisions for private hospitals specified in the Roads and Maritime Services Guide to Traffic Generating Developments (2002) (**RMS GTGD**). A copy of page 3-21 of the RMS GTGC is provided below.

It is recommended that the models based on the number of beds (B) should only be used when staffing data is unknown.

**Factors**

The hospitals surveyed had between 30 - 99 beds (B), and between 10 - 102 average staff per weekday day shift (ASDS).

The mean proportion of people who travelled to the site by vehicle was 87.4%, with a range of 67.3% - 98.2%. Average vehicle occupancy was found to be 1.3 persons per car.

Reviewing the above text, it is noted that the formula to calculate the number of car parking spaces is based upon a survey of between 30 – 99 bed private hospitals. As the proposed development has 224 beds which is 2.26 times greater in size than the 99 beds surveyed does this mean that more car parking is required?

Additional it is noted on page 79 of Council's Draft Urban Spatial Plan – Framework for a Local Strategic Planning Statement copied below that due to the dispersed pattern of urban development there is currently not an *efficient or effective public transport network*. As there is not an *efficient or effective public transport network* it is anticipated the majority of people travelling to the proposed development would use private vehicles.



Given the size of the proposed development and the fact there is not an *efficient and effective public transport network* on the Central Coast we request the Department of Planning seek an appropriated independent expert to advice on what formula should be applied to calculate the number of car parking spaces to be provided. We suggest the 50 additional carparking spaces proposed by the applicant which represents a 10% increase above the RMS GTGD may not be adequate.

The third implication relates to public transport. It is noted on page 8 of Appendix 9 of the Traffic Impact Assessment it states: “the development benefits from good bus services...”. It then lists 5 bus routes that provide service to the development. However, when you examine the bus route timetables presented in Appendix B Bus Routes 20, 32 32/4 and 33/4 only provide limited connections to the site. Where therefore hold the view that the site does not benefit from a good bus service rather it is connected by a staggered bus service. As the site is not connected to good bus service, we recommend that if the Department were to approve the development than as a condition of consent require the provision of a free shuttle bus service between the development and Gosford Railway Station Bus terminal.

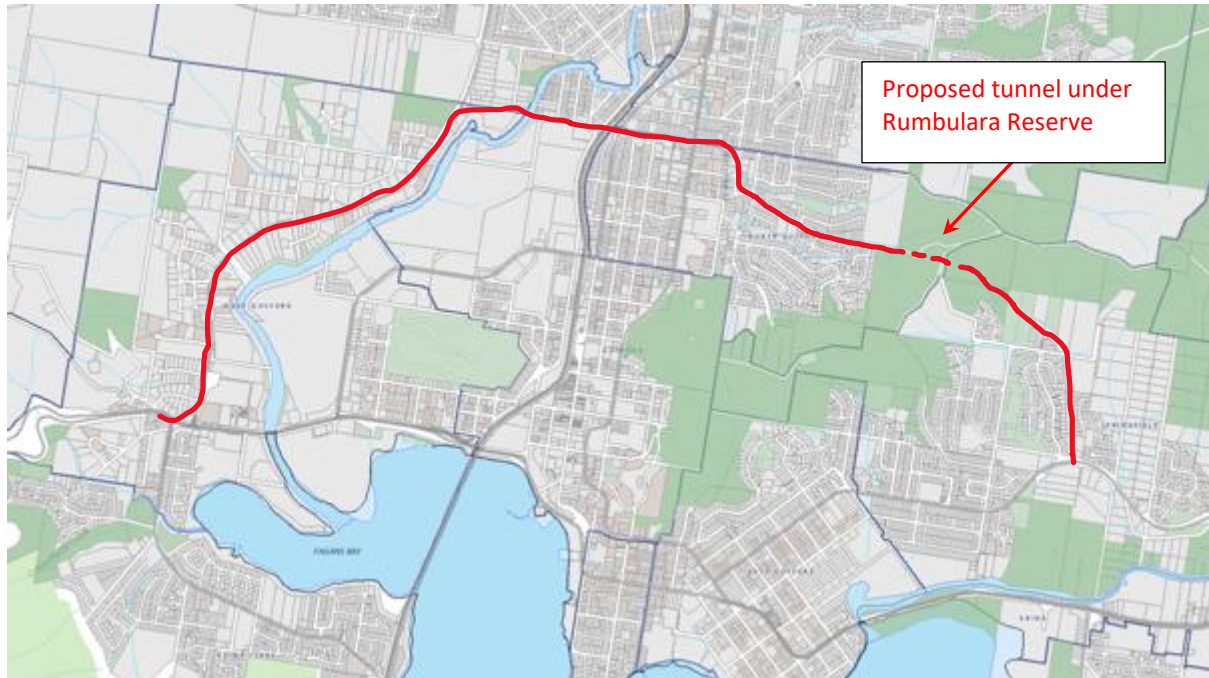
Yours sincerely

Friends of Gosford Pty Limited



## Appendix A

Proposed east west/north south bypass around Gosford City Centre. The proposed route is presented in Figure 1.



**Fig 1 – Proposed east west /north south road bypass around the Gosford City Centre**

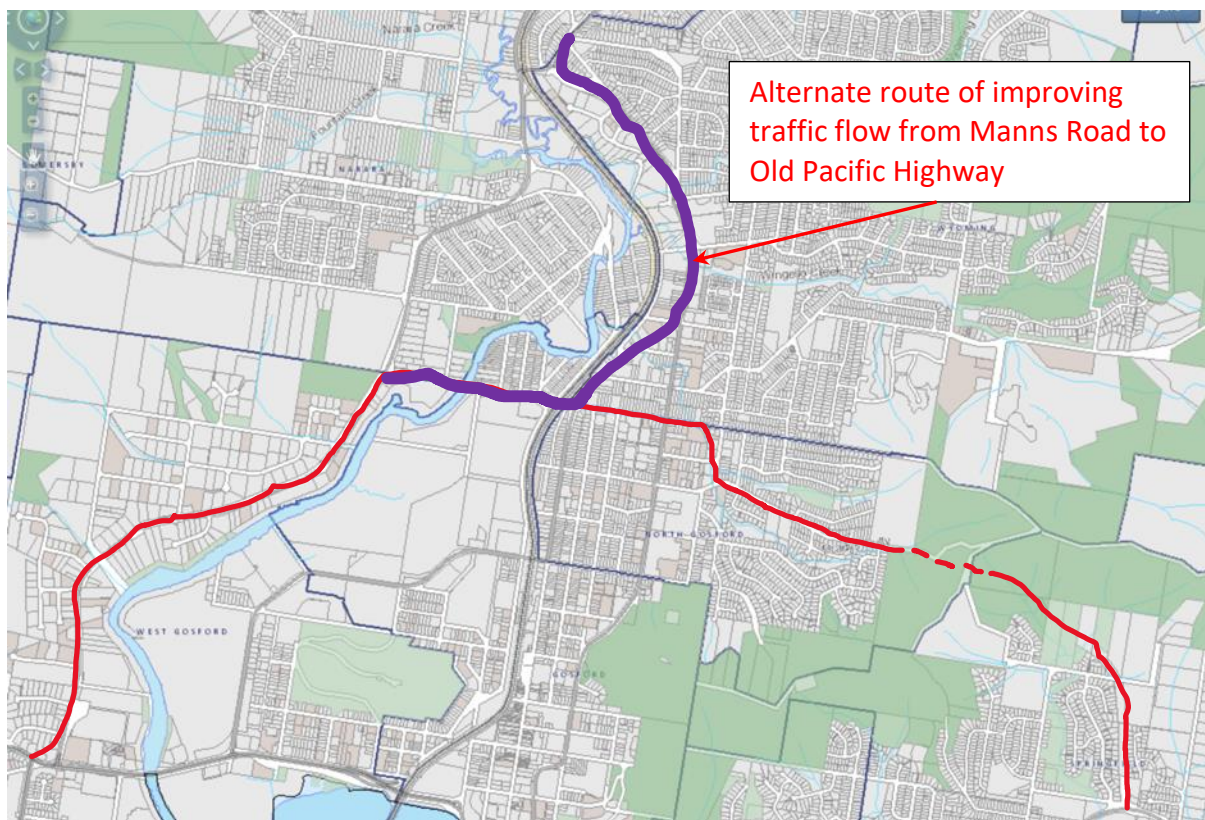
The proposed route has the following advantages:

- A. The route commences at West Gosford therefore there is no requirement to construct an alternative access from the M1 Motor Way down the escarpment which was an earlier consideration of Council.
- B. The road grade along the entire route is level except for a slight grade variation in the central section of Glennie Street. This slight grade variation is not significant at the grade changes in elevation approximately 10 metres over a distance of approximately 200 metres.
- C. The proposed east / west bypass can be linked to the north / south upgrade of the Old Pacific Highway. By examining the RMS website indicates the State Government is planning the upgrade of the Narara to Lisarow – Pacific Highway and Manns Road upgrade between Narara Creek to Parsons Road consisting of the Northern section and Southern section illustrated in Fig 2.



**Fig 2 Proposed upgrading of the Narara to Lisarow**

Rather than constructing the Southern section colour coded blue in Fig 2 it is suggested the Northern section colour coded green should follow the existing Old Pacific Highway to the intersection of Glennie Street colour coded purple in Fig 3.



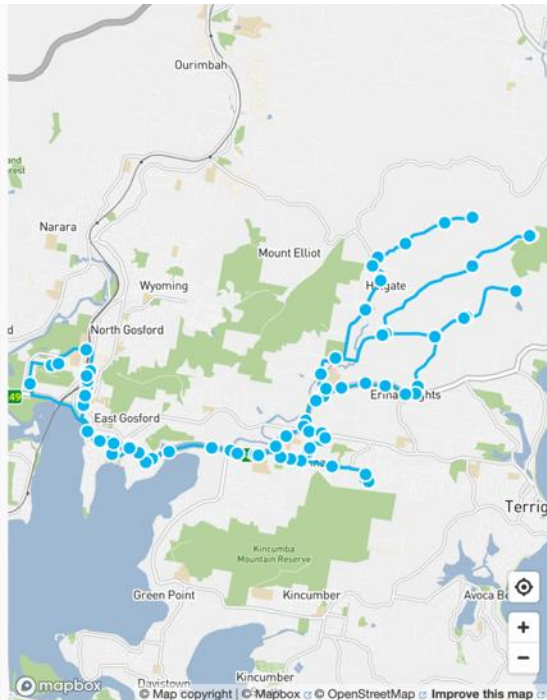
**Fig 3 – Alternative route to Manns Road and Old Pacific Highway**

This alternative route has the benefit of:

1. A major section of the Old Pacific Highway is already four lanes.
2. Relocating a proposed new railway bridge at the intersection of Manns Road with the Old Pacific Highway to the intersection of Glennie Street. Due to the proximity of Glennie Street to Etna Street the relocation of the railway bridge crossing to Glennie Street should avoid the need to expand the railway bridge crossing at Etna Street.
3. Constructing one new bridge over Narara Creek at the western end of Glennie Street west avoids the requirement to construct two new bridges over Narara Creek and its associated tributaries on Manns Road.
4. Avoids the residential section of Narara which fronts Manns Road
5. Widening the western end of Glennie Street west is adjacent to the Gosford Show Ground and the small industrial estate. This gives improved access to both the Showground and the industrial estate.
6. Directing traffic along the Old Pacific Highway improves vehicle traffic to the commercial development along the Old Pacific Highway.
7. That section of the road from Manns Road to the intersection of Glennie Street and the Old Pacific Highway involving the crossing of Narara Creek and the railway line is the same route as the proposed east west bypass.
8. Cost of major infrastructure can be shared with two major projects of east west bypass and north south bypass diverting traffic around Gosford City Centre.

## Appendix B

### Route 20



**20**

**Gosford to Matcham via Erina Fair  
(Loop Service)**



Valid from: 28 Jan 2020

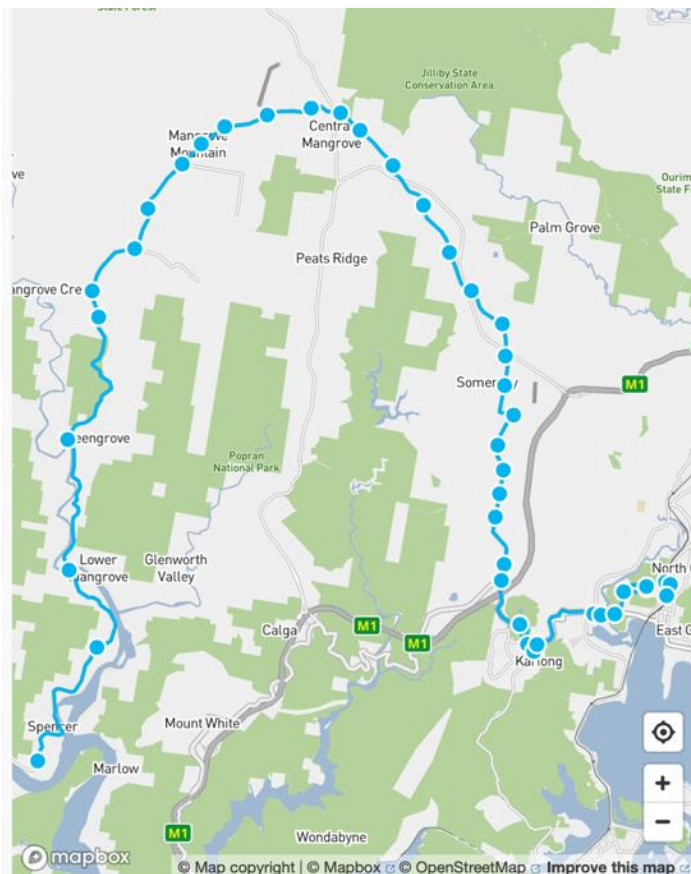
Creation date: 24 March 2020

NOTE: Information is correct on date of download.

Monday to Friday		♿	♿	♿	♿	♿	♿	♿
Gosford Station	-	-	07:08	09:15	12:20	-	15:25	17:30
William St Mall, Mann St, Gosford	-	-	07:09	09:16	12:21	-	15:26	17:31
Central Coast Hwy after Adelaide St, East Gosford	-	-	07:15	09:22	12:27	-	15:33	17:37
Central Coast Hwy opp Ernest St, Erina	-	-	07:17	09:25	12:30	-	15:42	17:40
Thames Dr before Aires Cl, Erina	-	-	07:21	09:29	12:34	-	15:49	17:44
Thames Dr opp Severn Cl, Erina	-	-	07:22	09:30	12:35	-	15:50	17:45
Karalta Rd after Riatta St, Erina	-	-	07:24	09:31	12:36	-	15:52	17:46
Erina Fair Interchange, Erina	-	-	07:26	09:33	12:38	15:56	15:56	17:48
Central Coast Hwy after Karwin Ave, Holgate	-	-	07:29	09:36	12:41	16:00	16:00	17:51
Central Coast Hwy at Kirkby Rd, Erina	07:30	-	-	-	-	-	-	-
Wattle Tree Rd opp Pollard Cl, Holgate	07:40	-	-	09:46	12:51	16:15	-	18:01
393 Oak Rd, Matcham	-	-	07:40	10:02	13:07	-	16:13	-
Matcham Rd after Central Coast Hwy, Erina Heights	-	07:34	-	-	-	-	-	-
Matcham Rd at Wambina Rd, Matcham	-	07:40	-	10:17	13:22	-	16:27	18:17
Erina Heights Public School, Central Coast Hwy, Erina Heights	-	-	-	10:24	13:29	-	16:34	-
Central Coast Grammar, School Grounds, Erina Heights	07:53	07:55	07:55	-	-	-	-	-
Erina Fair Interchange, Erina	-	-	08:01	10:29	13:34	-	16:40	-
Thames Dr before Aires Cl, Erina	-	-	08:06	10:34	13:39	-	16:44	-
Central Coast Hwy before Karalta Rd, Erina	-	-	-	-	-	16:25	-	-
Erina High School, The Entrance Rd, Erina	-	-	08:12	10:38	13:43	16:25	16:48	-
Victoria St after Adelaide St, East Gosford	-	-	08:15	10:42	13:47	16:31	16:53	-
Melbourne St at Central Coast Hwy, East Gosford	-	-	08:16	-	-	-	-	-
St Edwards College, Russell Drysdale St, East Gosford	-	-	08:18	-	-	-	-	-
Gosford Public School, Faunce St, Gosford	-	-	08:25	-	-	-	-	-
Gosford Public School, Batley St, Gosford	-	-	08:26	-	-	-	-	-
Gosford High School, Racecourse Rd, Gosford	-	-	08:28	-	-	-	-	-
Gosford Station	-	-	08:32	10:50	13:55	16:39	17:02	-



## Route 32



# 32

## Gosford to Spencer

# B

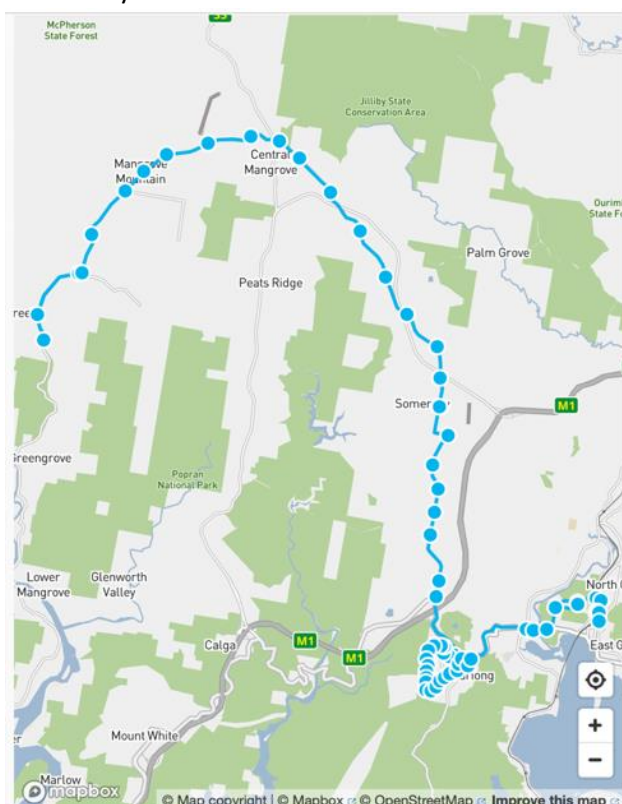
Valid from: 28 Jan 2020

Creation date: 24 March 2020

NOTE: Information is correct on date of download.

Monday to Friday	♿	♿	♿					
Service Information		S	S					
Imperial Centre, Erina St East, Gosford	-	15:20	16:20	16:40	18:08			
Gosford Station	05:36	15:21	16:21	16:41	18:09			
Henry Kendall High School, Batley St, Gosford	-	15:30	-	-	-			
Pacific Hwy after Brisbane Water Dr, West Gosford	05:45	15:37	16:31	16:51	18:17			
Kariong Mountains High School, Festival Dr, Kariong	-	15:44	-	-	-			
Wisemans Ferry Rd opp Somersby Public School, Somersby	06:03	16:01	16:46	17:07	18:33			
Wisemans Ferry Rd opp Mangrove Mountain Village Shops, Mangrove Mountain	06:21	16:18	17:00	-	18:49			
Wisemans Ferry Rd at Berecny Rd, Mangrove Mountain	06:30	16:28	17:08	-	-			
Wisemans Ferry Rd Wisemans Ferry Rd, Spencer	-	16:48	-	-	-			

## Route 32/4



**32/4**

**Mangrove Mountain to Gosford  
via Kariong**

**B**

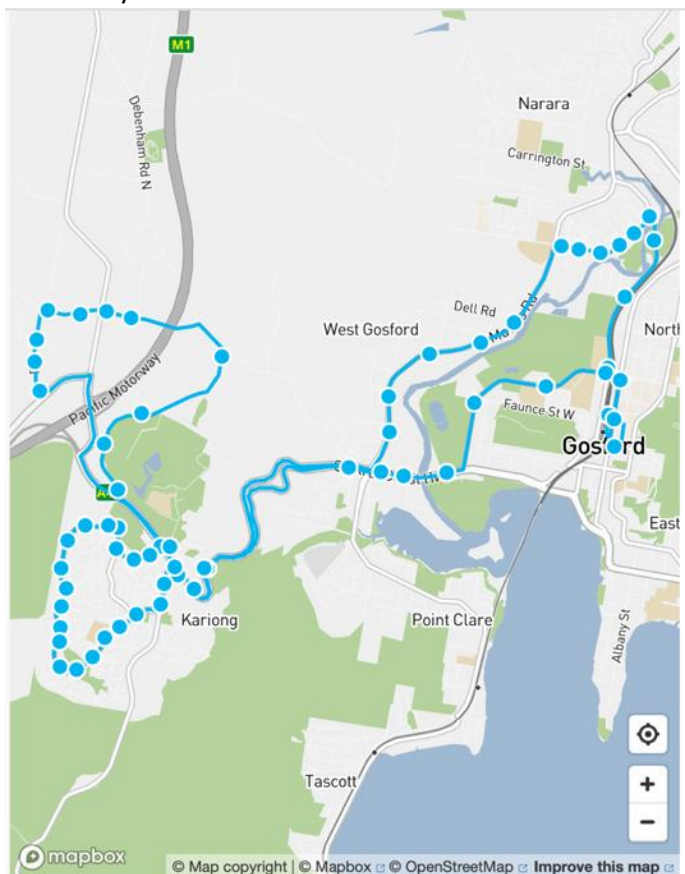
Valid from: 28 Jan 2020

Creation date: 24 March 2020

NOTE: Information is correct on date of download.

<b>Monday to Friday</b>				
Wisemans Ferry Rd at Ironbark Rd, Mangrove Mountain	-	-	-	\$08:30
Wisemans Ferry Rd Opp Berecyr Rd, Mangrove Mountain	06:34	-	-	\$08:32
Mangrove Mountain Village Shops, Wisemans Ferry Rd, Mangrove Mountain	06:40	-	-	\$08:42
Central Mangrove Public School, Central Mangrove	-	-	-	08:50
Somersby Public School, Wisemans Ferry Rd, Somersby	K06:56	K07:36	K08:59	
Curringa Rd after Arunta Ave, Kariong	07:12	07:49	09:13	
Langford Dr after Mitchell Dr, Kariong	07:20	07:57	09:21	
Pacific Hwy after Manns Rd, West Gosford	K07:28	K08:05	K09:29	
Henry Kendall High School, Batley St, Gosford	-	08:10	-	
Gosford Station	07:37	08:17	-	
Mann St at Faunce St, Gosford	-	-	09:40	
Imperial Centre, Erina St East, Gosford	-	-	09:42	
<b>Saturday</b>				
Somersby Public School, Wisemans Ferry Rd, Somersby	K08:16	K18:18		
Curringa Rd after Arunta Ave, Kariong	08:24	18:26		
Langford Dr after Mitchell Dr, Kariong	08:31	18:32		
Pacific Hwy after Manns Rd, West Gosford	K08:39	K18:39		
Gosford Station	-	18:50		
Mann St at Faunce St, Gosford	08:49	-		
Imperial Centre, Erina St East, Gosford	08:51	-		

## Route 33/4



# 33/4

## Gosford to Somersby industrial Estate and Kariong (Loop Service)



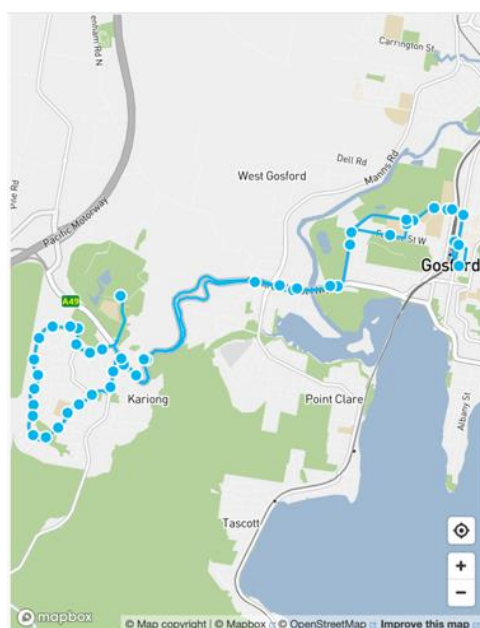
Valid from: 28 Jan 2020

Creation date: 24 March 2020

NOTE: Information is correct on date of download.

Monday to Friday				
Gosford Station	L05:30	L06:00	L07:49	L08:20
Maliwa Rd before Manns Rd, Narara	05:35	06:05	07:55	08:26
Manns Rd opp Stockyard Pl, West Gosford	05:39	06:09	08:00	08:32
Pacific Hwy after Brisbane Water Dr, West Gosford	L05:41	L06:11	L08:04	L08:35
Kangoo Rd after Central Coast Hwy, Somersby	05:46	06:16	08:10	08:42
The Avenue opp Kariong Fire Station, Kariong	-	-	08:23	-
Curringa Rd after Arunta Ave, Kariong	05:59	06:29	08:26	08:53
Kariong Public School, Langford Dr, Kariong	06:06	06:36	08:34	08:59
Langford Dr after Mitchell Dr, Kariong	06:08	06:38	08:35	09:00
Pacific Hwy after Manns Rd, West Gosford	06:17	06:47	08:44	09:08
Gosford Station	06:27	06:57	-	-
Mann St at Faunce St, Gosford	-	-	08:57	09:18
Imperial Centre, Erina St East, Gosford	-	-	08:59	09:20

## Route 34



### 34 Gosford to Kariong (Loop Service) B

Valid from: 28 Jan 2020		Creation date: 24 March 2020										
		NOTE: Information is correct on date of download.										
Monday to Friday		Δ	Δ	Δ	Δ	Δ	Δ	Δ	Δ	Δ	Δ	
Imperial Centre, Erina St East, Gosford					09:31	10:01	10:31	11:01	11:31	12:01		
Gosford Station	05:24	06:47	-		09:32	10:02	10:32	11:02	11:32	12:02		
Pacific Hwy after Brisbane Water Dr, West Gosford	05:30	06:54	-		09:40	10:10	10:40	11:10	11:40	12:10		
Currunga Rd after Arunta Ave, Kariong	05:34	06:59	07:57	09:45	10:15	10:45	11:15	11:45	12:15	12:45		
Langford Dr after Mitchell Dr, Kariong	05:41	07:07	08:05	09:52	10:22	10:52	11:22	11:52	12:22	12:52		
Woy Woy Rd opp Marberry Ave, Kariong	05:42	07:08	08:06	09:53	10:23	10:53	11:23	11:53	12:23	12:53		
Pacific Hwy after Manns Rd, West Gosford	05:48	07:15	08:13	10:00	10:30	11:00	11:30	12:00	12:30	13:00		
Gosford Public School, Faunce St, Gosford			08:20									
Gosford Station	05:57	07:27	08:30									
Mann St at Faunce St, Gosford					10:10	10:40	11:10	11:40	12:10	12:40		
Imperial Centre, Erina St East, Gosford					10:12	10:42	11:12	11:42	12:12	12:42		
Monday to Friday		Δ	Δ	Δ	Δ	Δ	Δ	Δ	Δ	Δ	Δ	
Service Information		S										
Imperial Centre, Erina St East, Gosford	12:31	13:01	13:31	14:01	-	15:25	15:50	16:11	16:40			
Gosford Station	12:32	13:02	13:32	14:02	-	15:26	15:51	16:12	16:41			
Henry Kendall High School, Batley St, Gosford						15:34						
Pacific Hwy after Brisbane Water Dr, West Gosford	12:40	13:10	13:40	14:10	-	15:42	16:00	16:22	16:51			
Currunga Rd after Arunta Ave, Kariong	12:45	13:15	13:45	14:15	15:08	15:47	16:05	16:27	16:56			
Langford Dr after Mitchell Dr, Kariong	12:52	13:22	13:52	14:22	15:15	15:56	16:12	16:34	17:03			
Woy Woy Rd opp Marberry Ave, Kariong	12:53	13:23	13:53	14:23	15:16	15:58	16:14	16:35	17:04			
International Football School, Carinya St, Kariong						16:02						
Pacific Hwy after Manns Rd, West Gosford	13:00	13:30	14:00	14:30	15:25	16:12	-	16:45	17:15			
Gosford Station					15:41							
Mann St at Faunce St, Gosford	13:10	13:40	14:10	14:40		16:25	-	16:55	17:24			
Imperial Centre, Erina St East, Gosford	13:12	13:42	14:12	14:42		16:27	-	16:56	17:25			
Monday to Friday		Δ	Δ	Δ	Δ	Δ	Δ	Δ	Δ	Δ	Δ	
Imperial Centre, Erina St East, Gosford	17:11	17:38	18:08									
Gosford Station	17:12	17:39	18:09	18:44	19:10	19:40	20:23	21:18	22:20			
Pacific Hwy after Brisbane Water Dr, West Gosford	17:22	17:48	18:17	18:51	19:16	19:46	20:29	21:24	22:26			
Currunga Rd after Arunta Ave, Kariong	17:27	17:53	18:22	18:56	19:20	19:50	20:33	21:28	22:30			
Langford Dr after Mitchell Dr, Kariong	17:34	18:00	18:29	19:03	19:26	19:56	20:39	21:34	22:36			
Woy Woy Rd opp Marberry Ave, Kariong	17:35	18:01	18:30	19:04	19:27	19:57	20:40	21:35	22:37			
Pacific Hwy after Manns Rd, West Gosford	17:45	18:07	18:36	19:10	19:33	20:03	20:46	21:41	22:43			
Gosford Station		18:17	18:46	19:19	19:42	20:12	20:55	21:50	22:52			
Mann St at Faunce St, Gosford	17:55											
Imperial Centre, Erina St East, Gosford	17:56											
Monday to Friday		Δ										
Gosford Station	23:20											
Pacific Hwy after Brisbane Water Dr, West Gosford	23:26											
Currunga Rd after Arunta Ave, Kariong	23:30											
Langford Dr after Mitchell Dr, Kariong	23:36											
Woy Woy Rd opp Marberry Ave, Kariong	23:37											
Pacific Hwy after Manns Rd, West Gosford	23:43											
Gosford Station	23:52											