

23 June 2020

218153

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

Attention: Megan Fu, Principal Planner, Social and Infrastructure Assessments

Dear Megan,

**RE: RESPONSE TO REQUEST FOR INFORMATION 2
GREENWICH HOSPITAL CONCEPT PLAN (SSD 8699)**

Ethos Urban has prepared this letter on behalf of HammondCare in response to your Request for Information letter dated 20 April 2020, and the associated submissions received during the re-exhibition period of SSD 8699, relating to the Greenwich Hospital Concept Development.

HammondCare and the project team have considered all matters raised by the Department and a response to each item is summarised in the following table (**Table 1**). This letter is accompanied by the following supporting documents:

- Addendum Bushfire Statement prepared by Building Code and Bushfire Hazard Solutions (**Attachment A**);
- Addendum Transport Statement prepared by Barker Ryan Stewart (**Attachment B**);
- River Road Building Typology Map prepared by Ethos Urban (**Attachment C**);
- Response to Agency Submissions prepared by Ethos Urban (**Attachment D**);
- Response to Public Submissions prepared by Ethos Urban (**Attachment E**);
- Revised Shadow Diagrams prepared by Bickerton Masters (**Attachment F**);
- Updated Drawing S.02 prepared by Bickerton Masters (**Attachment G**);
- Arboricultural Statement prepared by Redgum (**Attachment H**); and
- Copy of Site Survey prepared by Lockley Land Title Solutions (**Attachment I**).

Table 1 Response to Issues

Issue Raised	Response
State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004	
<p>Clause 27 Bushfire prone land Clause 27(2) requires consideration of the general location of the proposed development, the means of access to and egress from the general location and other relevant matters. The Department requests that the Applicant considers and provides a response to these matters.</p>	<p>The application has previously addressed Clause 27(1) of SEPP Seniors, which relates to land that is bushfire prone, to the satisfaction of the RFS. This clause requires compliance with <i>Planning for Bush Fire Protection</i> which requires a more rigorous assessment than that required under Clause 27(2) which deals with land in the vicinity of bushfire prone land. Notwithstanding, Building Code and Bushfire Hazard Solutions (BCBHS) has since prepared an Addendum Bushfire Statement (Attachment A) which confirms that consideration has also been given to Clause 27(2) of the Seniors SEPP. This statement is also supported by an</p>

Issue Raised	Response
	Addendum Transport Statement prepared by Barker Ryan Stewart (Attachment B).
<p>Clause 29 Consent Authority to Consider Certain Site Compatibility Criteria Clause 29 requires the Department to give consideration to the criteria contained in Clause 25(5)(b)(i)(iii)(v).</p>	See below.
<p>Clause 25(5)(b)(iii) relates to adequacy of services and infrastructure and was not specifically addressed in the Response to Submissions Report. The Department considers that the adequacy of services and infrastructure must be addressed in light of the cumulative development of housing covered by the SEPP.</p>	<p>Clause 25(5)(b)(iii) requires development to be compatible with surrounding land uses having regard to the services and infrastructure that are, or will be, available to meet the demands arising from the proposed development. With reference to the services identified in the clause, the proposal has access to all necessary services and infrastructure, and will enhance the services available to surrounding land uses. Specifically:</p> <ul style="list-style-type: none"> • The site has direct access to local and regional retail centres, including North Sydney and Lane Cove, via a regular bus service stopping at the front of the site. • These same centres provide a range of community and medical services, and the development itself will provide substantial health care services to the benefit of the broader community. In this regard, the development will respond to increasing demand for specialist care for the elderly in northern Sydney and will remove pressure on the public health system. • The development is capable of complying with the accessibility requirements set out in Clause 26 of the SEPP.
<p>Clause 25(5)(b)(v) relates to the impact of the bulk and scale of the development. The Department considers the revised bulk and scale of the proposed seniors living apartments and on the western side of the site and the proposed hospital continues to be inconsistent with the generally low density residential character of the area. Further, the height of the proposed buildings still continues to result in a significant visual impact from across the valley to the west.</p> <p>To satisfy clause 29, the Department considers the extent of seniors living on the site should be decreased, which would reduce vegetation removal, visual impacts, and provide space for the hospital to be accommodated in a building of reduced height and visual prominence.</p>	<p>As previously outlined in the RFI report (refer to Section 2.1.2), the quantum of seniors living GFA proposed for the site has already been reduced by approximately 10% as part of a suite of design amendments made in response to the public and agency submissions.</p> <p>Due to HammondCare's continuum of care model, whereby the supported seniors living is part of the health service delivered by the hospital (with care provided in-home where possible), a further reduction to the GFA would have a direct impact on the number of people with chronic health care needs that would benefit from HammondCare's services. Furthermore, the proposed seniors living is necessary to ensure the long-term financial sustainability of Greenwich Hospital campus and significant reductions to GFA would negatively affect the viability of the broader development. It is emphasised that the capital for this project is fully funded by HammondCare, as no public money or government funding provided for capital works on Schedule 3 Hospital.</p> <p>In regard to the Department's key concerns surrounding the bulk and scale, it is noted that:</p> <ul style="list-style-type: none"> • Clause 25(5)(b)(v), requires the consent authority to consider the impacts bulk and scale and not that it be consistent with the surrounding area. • Reducing the GFA would not necessarily reduce vegetation removal as this GFA would be removed from upper levels of the buildings. Furthermore, HammondCare has already enhanced the retention of vegetation and is also willing to accept a condition requiring protection of Tree 167. • Reducing the GFA would not materially improve visual impacts from Northwood as any proposal consistent with

Issue Raised	Response
	<p>the scale of the existing buildings on the site would result in a similar visual impact (due to the nature of views looking across a valley). Accordingly, HammondCare is willing to commit to other mitigation treatments such as the greening of facades/roofs to blend in with the surrounding mature vegetation. This is considered to be a more effective mitigation measure and is supported by the Visual Impact Assessment undertaken for the development.</p> <p>On this basis, it is considered that a substantial further reduction to the GFA would not materially improve the environmental impacts of the proposal, but would result in a substantial gap in the health care services available to the community, placing additional strain on existing government funded facilities. Therefore, the public benefits afforded by the development outweigh the perceived impacts associated with the scale of development proposed, particularly when these impacts can be appropriately mitigated through the detailed design process.</p>
<p>Clause 33 Neighbourhood Amenity and Streetscape The Department considers the amended development continues to be contrary to Clause 33. The character of the area is defined by low density residential development generally one and two storeys, with only the existing hospital buildings exceeding this height.</p> <p>The Department maintains that proposed seniors living apartments (as amended) are considered inconsistent with the desirable elements of the location's current character and would not contribute to the quality and identify of the area. Further, the proposed development would not complement and sensitively harmonise with the heritage listed Pallister House. Further amendments are required to ensure that the development has building heights compatible in scale with adjacent development and the landscaped setting is retained along the frontage of the site, including retention of the significant Tree 167.</p>	<p>As outlined in the previous RFI Report (refer to Section 2.2.2), it is considered that the development complies with Clause 33, noting that this clause requires the consent authority to consider the impact on the character of the area, not for the development to be consistent with the character of the area. It is emphasised that:</p> <ul style="list-style-type: none"> • The site is zoned SP2 Infrastructure, with no height or FSR, in recognition that the development for health infrastructure should not have the same character as the surrounding zoning. • SEPP Seniors is specifically drafted to allow for seniors living on SP2 zoned land and <i>Catholic Healthcare Limited v Randwick City Council [2019] NSWLEC 99</i> acknowledges that the form of seniors living is driven by its function. While development may not replicate the surrounds, it may be compatible with its character. • The broader River Road catchment is characterised by a wide range of building typologies as highlighted at Attachment C. This includes existing residential flat buildings between 3 and 4 storeys high and densities planned for residential buildings up to 8 storeys in height (associated with the St Leonards South Planning Precinct). Greenwich Public School, directly opposite the site, is also currently undertaking works with a built form of up to 4 storeys. Importantly, the built form of the existing Greenwich Hospital does not currently have a low density residential character and the proposed development includes buildings of 6 and 8 storeys which is considered to be compatible with the existing and future character of River Road. • The proposal is the result of significant and detailed masterplanning analysis to minimise its environmental impacts through the placement of buildings. • Heritage NSW considered the amended design to be appropriate, including in its relationship with Pallister. <p>Furthermore, HammondCare would be willing to review the landscaped setting along River Road, including a commitment to the retention of the significant Tree 167.</p>

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<p>Clause 50 Standards That Cannot Be Used to Refuse Development Consent</p> <p>The RtS asserts that the 70 per cent of dwellings will receive three hours of direct sunlight mid-winter due to the siting and location of the proposed buildings. The details of the solar access modelling that is identified in the RtS must be provided to demonstrate how solar access would be achieved.</p>	<p>Solar access diagrams were submitted as part of the amended plan package and it is understood the Department is now satisfied with this matter. Solar access will be further addressed at the detailed design stage when the final design and layout of rooms is known.</p>
<p>State Environmental Planning Policy 65 (Design Quality of Residential Apartment Development) (SEPP 65)</p> <p>It is not considered that the amended proposal adequately responds to the Design Quality Principles contained in Schedule 1 of SEPP 65. In particular, the built form of the proposed development is considered inconsistent with Principles 1 and 2.</p> <p>Further amendments are required to ensure that the development has building heights compatible in scale with adjacent development and buildings retained on the site, and the landscaped setting is retained.</p>	<p><i>Design Principle 1: Context and Neighbourhood Character</i></p> <p>As outlined above, the proposal is considered to have an appropriate relationship with its context and the character of the neighbourhood. Importantly, Design Principle 1 states that it '<i>also includes social, economic, health and environmental conditions</i>'. In this regard, the proposal will make a significant contribution to the social, economic and health conditions of the area, providing much needed facilities for the future health care needs of Northern Sydney.</p> <p><i>Design Principle 2: Built Form and Scale</i></p> <p>As outlined above, the proposed built form and scale of the development is considered appropriate in context of the proposed use and the masterplanning process undertaken for the site which minimises the environmental impacts of the built form.</p> <p>It is emphasised that Design Principle 2 recognises that '<i>good design also achieves an appropriate built form for a site and the building's purpose in terms of building alignments, proportions, building type, articulation and the manipulation of building elements</i>'. As detailed in the previous RTS report, the proposed built form is a result of the proposed function of the buildings which require a vertical form for the efficient delivery of care and the retention of significant landscaped open space, and a site specific response which seeks to balance the delivery of the GFA necessary to support the upgrade of the hospital and the environmental constraints of the site.</p>
<p>Traffic Impacts</p> <p>The Department notes that the cumulative impacts from recent and proposed developments have not been assessed in the Traffic and Parking Impact Assessment. The Department requests that these cumulative impacts and an updated assessment is provided.</p>	<p>Barker Ryan Stewart has prepared an Addendum Transport Statement (Attachment B) that confirms their original assessment was undertaken using conservative traffic estimates and that the proposed use will generate only minor increases to traffic volumes along River Road. It is therefore reasonable to conclude that the intersection modelling conducted by Barker Ryan Stewart in 2018 for the redevelopment of Greenwich Hospital remains appropriate, notwithstanding the new developments proposed for the surrounding area. Furthermore, while it is acknowledged that there are other developments in the surrounding area that will contribute additional traffic to the road network, the proposal should not be responsible for mitigating the impact of traffic from these other developments.</p>
<p>Response to Submissions</p>	<p>In accordance with the Department's letter dated 20 December 2019, a Response to Submissions received during the re-exhibition of the proposal is provided at Attachments D and E.</p>

Issue Raised	Response
Other matters	Revised Shadow Diagrams (Attachment F) have been provided as per the Department's request on 29 April 2020. It is noted that these were also provided via email on 14 May 2020.
	An updated plan (Drawing S.02) has been provided to confirm the removal of the high-level link bridge between the Hospital and Respite Centre as per Heritage Council comments (Attachment G).
	An Arboricultural Statement prepared by Redgum has been provided to respond to Environment, Energy and Science's comments concerning weed species (Attachment H).
	Further clarification was requested regarding the discrepancies between the contours shown on the site plans and the civil engineering drawings. It is noted that both the architectural plans and civil engineering drawings are based off the same Site Survey that was submitted with the application (Attachment I). However, the engineering drawing provides some additional information in relation to civil infrastructure (such as detail around the headwall associated with the outlet of the 750mm stormwater pipe).
	As detailed in the Response to Public Submissions Report, the southwestern extremity of the site was not surveyed and the contours were estimated by interpolation (due to the excessively steep terrain of the area which inhibited access) which was clearly identified on the Survey Plan. Whilst this does not affect the environmental assessment of the Concept Plan, HammondCare would be prepared to undertake a detailed survey of this part of the site as part of the subsequent detailed design application.

Conclusion

We trust that the information provided satisfies the requirements of the additional information request. We note that as no changes have been made to the proposed plan set, renotification of the response is unnecessary. We look forward to the Department progressing the assessment of the application and to receiving a set of draft conditions for consideration in due course.

Should you have any further queries about this matter, please do not hesitate to contact me on 9409 4927 or cforrester@ethosurban.com.

Sincerely,



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