

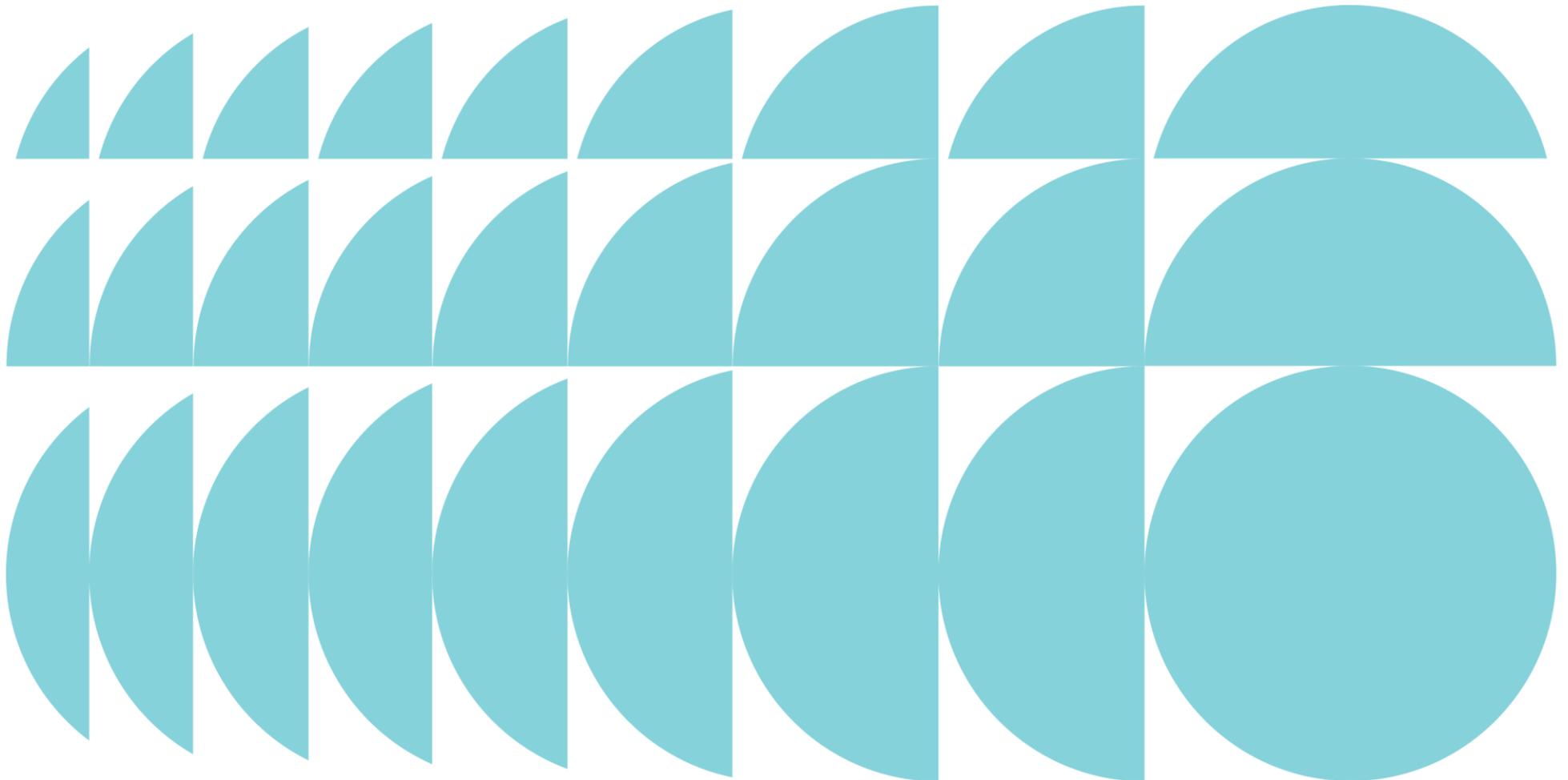
ETHOS URBAN

Response to Agency Submissions 2

Redevelopment of Greenwich Hospital

Submitted to Department of Planning, Industry and
Environment

18 June 2020 | 2190376



Issue	Response
<p>1. Lane Cove Council</p> <p>Council objects to the proposal on a number of grounds, but in particular the inclusion of the Seniors Living in the proposal and calls for the Director General to rule the residential component is not State Significant as it is a prohibited use.</p> <p>Under Council's Local Environmental Plan, the land is zoned for Health Service Facilities. The proposed development provides for seniors housing which but for the provision of the SEPP, is not permissible and does not meet the objectives of the zone. In this regard the proposed Seniors Living Building cannot be supported by Council.</p>	<p>SEPP Seniors permits seniors living developments on land zoned for SP2 Infrastructure if it adjoins land zoned primarily for urban purposes regardless of whether the use is permissible in the land use zone. The site adjoins land zoned R2 Low Density Residential, which is considered land zoned for urban purposes, and therefore seniors living is a permissible use at the site subject to meeting the design requirements and development standards of the SEPP. As outlined within the RTS report, the seniors living component of the development is an integral part of the health services proposed and its operation cannot be separated from that of the hospital.</p> <p>Furthermore, it is important to distinguish between the specialist seniors living proposed by HammondCare for Greenwich and other forms of seniors living such as retirement living. Although typical retirement living developments may cater to those aged 55+ who are largely independent, the seniors living proposed for this project is intended to attract older residents (75+ years of age) with chronic healthcare needs. Specifically, the accommodation aims to bridge the gap between general community living and residential aged care by providing social and clinical support for older people who may lack family support or require specialised care but want to remain as independent as possible.</p> <p>The seniors living proposed is not functionally independent from the Hospital and cannot function without it. This is reflected by the updated project staging as proposed as part of the previous RTS package, under which the new Hospital building will be the first of the buildings to be constructed. Under the proposed scheme, the seniors living facilities form an integral part of the development and will be fully integrated with the hospital use (sharing the same podium, basement parking and community facilities). Under HammondCare's 'continuum of care' model, this allows residents to access services as appropriate for their individual care needs and the integration and range of the specialist services proposed for the campus will give local residents the opportunity to remain living within their community. The serviced nature of the accommodation allows people to age in place and access the range of health services provided by HammondCare within their home environment, including with regards to chronic disease, prolonged duration of illness and complex co-morbidities.</p>
<p>The proposal is recommended to be modified to consist of a Health Service Facilities only. The deletion of the seniors living building would significantly reduce the overall density of the re-development and provide expansion opportunities in the future and greater sensitivity to the heritage listed Pallister House and its curtilage.</p> <p>Council acknowledges the need for Seniors living facilities. But considers the subject site inappropriate for this use.</p>	<p>As above, the proposed seniors living is a specialised use which is serviced and operates in conjunction with the rest of the hospital in accordance with HammondCare's innovative 'continuum of care' model. It is noted that the seniors living units will be retained by HammondCare and not Strata subdivided for individual sale.</p> <p>The proposed seniors living use is also necessary to ensure the long-term financial sustainability of Greenwich Hospital. It is important to note 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. In this regard, HammondCare relies on revenue from its operations, donations and government grants to fund their operations and healthcare services. The quantum of seniors living uses on-site was reduced from a GFA of 14,400m² as originally submitted under the EIS to 13,000m² as part of a suite of design amendments made in the RTS package. A further reduction of seniors living uses would result in the redevelopment of the Hospital being commercially unviable, and therefore rendering the entire project unsustainable. This would result in a substantial gap in the health care services available to the community and would put additional strain on existing government funded facilities.</p>

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	<p>It is considered that the integrated campus will respond to the future trends of healthcare and will provide for residents of northern Sydney for the next 50 years. The reconfiguration of the Hospital, in addition to improvements in medical treatments may effectively lead to a tripling or quadrupling of patients given care over time (as necessary). This reduces the likelihood of the Hospital requiring further expansion in the future, however, the design of the seniors living uses allows for potential conversion to health-related uses in the future, if required.</p> <p>Is also noted that the OEH submission acknowledges the substantial changes made to the building envelopes and considers the proposal to be appropriate subject to their recommended conditions of consent.</p>
<p>The proposed multi-storey residential buildings development would not be consistent with the R2 Low Density Residential one and two stories development within the vicinity which would not be consistent with the provisions of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004.</p>	<p>Although it is acknowledged that the proposed development contains building envelopes larger than other buildings within its immediate surrounds, this does not mean that the development is incompatible with its surrounds. It is noted that the existing hospital development is also larger than the surrounding R2 low density residential area which is consistent with its function and special use zoning of the site.</p> <p>The Greenwich Hospital site has undergone an extensive master planning process based on a detailed Site Analysis. This process has informed the layout and massing of the proposed building envelopes which carefully balances a number of competing planning objectives as well as the functional and design needs of the campus. The site has been carefully master planned to concentrate mass in the middle of the site to minimise impacts and to provide a transition in built form to surrounding development.</p>
<p>As stated in the original submission, Council would be supportive in principle of a proposal for the re-development of the existing Hospital and expansion to allow additional health care facilities as they relate to the intended use of the site as defined by the Lane Cove LEP 2009.</p> <p>The removal of the Seniors Living Component will provide further opportunities to address the bulk and scale of the Development. The Hospital component should be redesigned upon the deletion of the residential components to be located so as to not be on the highest point of the site and the height and bulk of the buildings minimised.</p>	<p>As detailed at Section 2.1 of the RTS, the proposed Seniors Living is an integral component of HammondCare's continuum of care model. It is important to distinguish between the specialist seniors living proposed by HammondCare for Greenwich and other forms of seniors living such as retirement living. Although typical retirement living developments may cater to those aged 55+ who are largely independent, the seniors living proposed for this project is intended to attract older residents (75+ years of age) with chronic healthcare needs. Specifically, the accommodation aims to bridge the gap between general community living and residential aged care by providing social and clinical support for older people who may lack family support.</p> <p>Removing the seniors living component would not facilitate a lower scaled hospital building as the development relies on the connection between the seniors living and hospital uses from both an operational and feasibility perspective. The height and scale of the Hospital is based on minimum operational and design requirements, being designed primarily for functionality to ensure efficient delivery of care and hence life safety. This necessitates a primarily vertical typology rather than a smaller sprawling design, which would result in insufficient operations and excessive distances having to be travelled by staff to reach patients. A further reduction of the bulk and scale of the scheme, from that as amended under the RTS package, would result in an inefficient low-rise development which has excessively high site coverage and requires removal of far more trees. Such a proposal would also fail to meet minimum feasibility requirements and would therefore result in the site remaining in its current form.</p>
<p>The applicant has modified a number of aspects of the original proposal to address Council's concerns relating to tree loss, heritage, bulk and scale. The revised design is considered to be overall a more sensitive approach to existing trees and vegetation on the site.</p>	<p>Noted.</p>

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<p>Council acknowledges and supports the removal of the seniors living villas as it would result in a total increased percentage of trees being retained on the site. However, Council remains concerned with the number of trees being removed in the revised design.</p>	<p>As noted in the RTS response, the amended development aims to maximise the retention of existing significant vegetation and provide new planting to increase the existing tree canopy. The proposed development will result in a net increase of 5 healthy and environmentally appropriate trees at the site (discounting trees proposed to be removed for reasons irrelevant to the proposed development). Overall, the landscaped area of the site as amended will increase by 8% (to 20,000m² or approximately 60% of the site area) compared to the original proposal and the deep soil zone will increase by 15% to 13,800m².</p>
<p>Council does not support the proposed respite clinic in proximity to the St. Vincent's Road frontage. The current location is inappropriate given the tree loss and impacts to the St. Vincent's Road frontage. Council would support the integration of the respite clinic into the main hospital compound area. This would ensure greater interconnectivity, efficiency and reduced impacts on tree canopy in this sensitive landscape.</p> <p>The revised design which accommodates the recommended changes would be considered acceptable, reasonable and in accordance with Councils environmental sustainability objectives and the directives of the North District Plan.</p>	<p>The location of the respite centre has been specifically designed to integrate with and minimise any impacts on the curtilage of Pallister House. Notably, such arrangements, including the deletion of the previous southern seniors living villas and their replacement with the respite centre, go above and beyond recommendations made by the OEH in relation to retaining views to Pallister House and the frontage from the main approach to the building. OEH has reviewed the amended proposal and stated that the proposed respite building is appropriate as it is amply screened by trees and will not be readily viewed from the access drive. Furthermore, fully integrating the respite centre into the Hospital building would further increase its bulk and scale, leading to greater visual impacts on the site's surrounds.</p>
<p>Council appreciates the changes to the hospital building which would improve the relationship between the hospital building and heritage listed Pallister House and its curtilage. The reduction in bulk to the western side of the hospital and more considered approach to the geometry on the south side would result in a superior and sympathetic outcome. It also improves sight lines to Pallister House from the primary Street frontage on River Road to allow the heritage item to be more visible from the public realm.</p>	<p>Noted.</p>
<p>Council is encouraged by and supports the relocation of the majority of at-grade parking to basement level as it would allow for increased opportunities for soft landscaping in open space areas and increased amenity.</p>	<p>Noted.</p>
<p>Council's resolution also highlights a number of key issues raised by the community which should be addressed, including:-</p> <ul style="list-style-type: none"> • The proponent's report incorrectly states that there will be a net an increase in the number of trees (86 lost and 60 planted) while the numbers actually indicate a decrease; 	<p>Under the revised scheme, 212 trees are proposed to be retained, including 48 additional trees that are now capable of being retained due to the design changes made under the RTS package. Furthermore, a minimum of 60 new environmentally appropriate trees will be planted on the site as part of the proposed development.</p> <p>Although the Arborist Report identifies a total of 86 trees for removal, 33 of such trees are recommended for removal irrespective of whether the proposed development goes ahead. This includes trees with compromised structural integrity, trees which are exempted from Council guidelines and compete with locally indigenous specimens, trees which are dead, and trees which are considered hazardous with potential to collapse onto the Council road reserve. Therefore, if these 33 trees are discounted (as their rationale for removal is irrelevant to the proposed development), there is to be a net increase of 5 healthy and environmentally appropriate trees on the site.</p> <p>Furthermore, HammondCare would be willing to commit to the protection of significant Tree 167.</p>

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<ul style="list-style-type: none"> The contours are incorrect on the south west corner resulting in the shadow analysis being incorrect. The contours are steeper than the survey conducted, which is reflected in the Civil Engineering documentation. 	<p>The southwestern extremity of the site was not surveyed in the original Site Survey (Appendix E of the original EIS) and the contours were estimated by interpolation. This was due to the excessively steep terrain of the area which inhibited access and was clearly identified on the Survey Plan. There is no development proposed at this part of the site and the shadow diagrams and other supporting studies remain accurate for the purposes of the proposed building envelopes. Notwithstanding, it is noted that the application seeks Concept Plan approval only, and that further assessment will be carried out as part of the detailed design application. If any supporting studies rely on an accurate survey of this part of the site, this will be identified and addressed at this time.</p>
<ul style="list-style-type: none"> The Visual impact from Northwood is understated as the documentation only shows the 'best case tree canopy corridor'; 	<p>The Visual Impact Statement attached to the RTS package models the visual impact of the development from Northwood opposite Bon Campbell Oval. This is considered to be the most appropriate location as being a public viewpoint, a higher number of viewers are expected to be generated at that site in accordance with the NSW Land and Environment Court's Planning Principles. It was found that the relevant visual impact is considered to be negligible.</p>
<ul style="list-style-type: none"> More extensive community consultation was requested but declined by the applicant; 	<p>HammondCare has undertaken an extensive consultation programme with the community and government agencies throughout the preparation of the amended proposal, well beyond the minimum threshold set by legislative requirements. A Community Consultation Summary Report was prepared by KJA and included at Appendix S of the previous RTS package. The document provided an overview of the consultation undertaken to date and more recently, communication in response to individual submissions.</p> <p>As outlined in the Summary Report, one-on-one meetings were offered to community groups including the GSL Action Group, Northwood Action Group, and Greenwich Community Association, all of which were declined.</p> <p>HammondCare is committed to ongoing community and stakeholder engagement throughout the life of the project. In addition to the regular statutory exhibition requirements, HammondCare will endeavour to continue their program of engagement through the next phases of assessment of the Concept Plan and during the subsequent detailed design application(s).</p>
<ul style="list-style-type: none"> The site has three driveways and traffic movements should be separated and defined between uses (residential/shops/deliveries/garbage etc) to improve safety and amenity on site; 	<p>The proposed development is for a Concept Plan only. Further details with regards to driveway design and traffic movements are to be finalised and submitted as part of a subsequent detailed design application.</p>
<ul style="list-style-type: none"> The proposed location of the respite clinic on St Vincent's Road is inappropriate for accessibility/parking reasons and would be difficult for outpatients to find. It should be consolidated with other health services and better located for public transport; 	<p>Further details with regards to wayfinding for the respite clinic are to be finalised and submitted as part of a subsequent detailed design application.</p>
<ul style="list-style-type: none"> The curtilage of the new residential buildings needs to be defined as part of new lots/uses to protect and enhance the amenity of residents particularly their ability to enjoy quiet 'private open space'; 	<p>Further details with regards to building curtilages are to be finalised and submitted as part of a subsequent detailed design application.</p>
<ul style="list-style-type: none"> In general, subdivision of the site into lots with boundaries by their use would provide better outcomes for residents, visitors and staff for any future development; 	<p>Further details with regards to subdivision are to be finalised and submitted as part of a subsequent detailed design application.</p>

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<ul style="list-style-type: none"> The extent of the APZ required and bushfire risk should be clarified; and 	Further details with regards to the APZ and bushfire risk are to be finalised and submitted as part of a subsequent detailed design application.
<ul style="list-style-type: none"> The second heritage area (the long site/bridal path area) should be considered. 	This will be clarified as part of a subsequent detailed design application.
2. Heritage Council of NSW	
<p>Since that time the proposal has undergone significant modification to attempt to address issues raised during the submission period, including those outlined above. Accordingly, the following comments are provided on the revised proposal presented in the Response to Submissions Report.</p>	Noted.
<p><u>Built and Landscape Heritage:</u> a) The Concept Proposal was modified to remove the seniors living villas proposed to the south of St Vincent's Road access drive. This retains the connection between Pallister and St Vincent's Road, the setting of the historic villa and reduces the impacts on the SHR listed site. This is considered appropriate.</p>	Noted.
<p>b) Any seniors living villas within the curtilage are to be north of the St Vincent's Road access drive. The amended proposal includes a Respite building in this location which is amply screened by trees and will not be readily viewed from this access drive. This is considered appropriate.</p>	Noted.
<p>c) While the concept proposal has not been modified to reduce the height of the hospital building and the western seniors living apartments as recommended to reduce the adverse heritage impacts on Pallister, they have been modified to reduce these impacts.</p> <p>The western end of the hospital building has been reduced in scale (now partially single story) and is concealed beneath a landscape Terrace to improve site lines to Pallister House from River Road.</p> <p>The lower section of the Hospital includes a 2-3 story podium intended to relate to the scale of Pallister House, partially reducing the impact of the floors above.</p> <p>The design of the south side of the hospital has been amended to have a stronger relationship and visual connection to Pallister House and its heritage curtilage.</p> <p>This is all considered appropriate.</p>	Noted.
<p>d) The plan has been modified to reconfigure the basement carpark to that it sits outside the curtilage of Pallister. This is considered appropriate.</p>	Noted.
<p>e) A landscape concept proposal (has been developed to ensure that the development does not impact on the significant landscape of Pallister, for</p>	Noted.

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<p>example, the former bridle path will be interpreted as a pedestrian footpath running through the site. A period garden is also planned around Pallister House to contribute to its heritage curtilage.</p> <p>The amended plans ensure that a large amount of mature vegetation contributing the immediate and wider setting of Pallister can be kept and incorporated into the proposed design. Where trees are removed, compensatory planting will be undertaken and will result in a net increase in trees. This is considered appropriate.</p>	
<p>f) An interpretation plan must be prepared for the site. The RTS report indicates that the applicant is happy to accept a condition of consent regarding this matter including the requirement to respond to the archaeological findings. That is considered appropriate.</p>	Noted.
<p>g) In addition, comments provided during the site visit by Heritage NSW staff outlined that the high-level link bridge between the Hospital and Respite Centre should be removed to minimise impacts on the heritage setting of Pallister. The link bridge still appears on several plans (e.g. Drawing S.02) but not on others in the Set of Approval Drawings (Appendix A). This bridge should be removed from all plans and drawings to the site to make it clear that its construction is not part of the proposed works.</p>	Noted. A revised plan has been provide showing the removal of the high-level link bridge.
<p><u>Recommended Conditions of Consent:</u> If approved, the following conditions of consent are recommended for the proposal:</p> <p>1. Setbacks from Pallister – The concept design should continue to be refined to ensure that the new buildings are setback as much as possible from Pallister’s north and northwest boundary and that a large landscaped area buffer zone is in place to help screen the development and reduce negative impacts to the primary and wider heritage setting of Pallister.</p>	Noted. Further refinements to setbacks from Pallister House will be explored as part of a subsequent detailed design application. A specific condition of consent is considered to be unnecessary in light of the need for a subsequent detailed design application which will facilitate further assessment of this matter.
<p>2. Nominated Heritage Consultant - A suitably qualified and experienced heritage consultant must be nominated for this project. The nominated heritage consultant must provide input into the detailed design (including on the form, detailing and materiality of the proposal), provide heritage information to be imparted to all tradespeople during site inductions, and oversee the works to minimise impacts to heritage values. The nominated heritage consultant must be involved in the selection of appropriate tradespersons and must be satisfied that all work has been carried out in accordance with the conditions of this consent.</p>	HammondCare is willing to accept a condition of consent in relation to this item.
<p>3. Specialist Tradespersons - All work to, or affecting, significant fabric shall be carried out by suitably qualified tradespersons with practical experience in conservation and restoration of similar heritage structures, materials and construction methods.</p>	HammondCare is willing to accept a condition of consent in relation to this item.

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4. Site Protection - Significant built and landscape elements are to be protected during site preparation and the works from potential damage. Protection systems must ensure significant fabric, including landscape elements, is not damaged or removed.	HammondCare is willing to accept a condition of consent in relation to this item.
5. Schedule of Conservation Works - A schedule of conservation works is to be prepared for Pallister by a suitably qualified and experienced heritage consultant nominated for the project. The schedule is to specifically address urgent, medium and long-term conservation works which support the conservation of the building. The approved schedule is to be implemented as part of redevelopment of Greenwich Hospital.	HammondCare is willing to accept a condition of consent in relation to this item.
6. Landscape Plan – The landscape concept plan is to be refined to provide specific detail on how the proposed formal parking and landscaped setting of the area surrounding Pallister is to be detailed to respect and reintroduce the historical landscaped setting and character of Pallister. All efforts should be made to screen the hospital and other buildings from Pallister.	The current design of the formal parking and landscaping is not yet final, with further refinements to be made as part of the subsequent detailed design application, as the design of the development is finalised. A specific condition of consent is considered to be unnecessary in light of the subsequent detailed design application which will facilitate further assessment of this issue.
7. Interpretation - An interpretation plan must be prepared in accordance with the NSW Heritage Division publication Interpreting Heritage Places and Items Guidelines, and the approved plan implemented prior to the issue of an occupation certificate. The interpretation plan must detail how information on the history and significance of Pallister will be provided for the public and make recommendations regarding signage and lighting. The plan must identify the types, locations, materials, colours, dimensions, fixings and text of interpretive devices that would be installed as part of this project, as well as a timeline for implementation of the interpretation. The plan should also incorporate the results of any archaeological investigative program undertaken for the Pallister site.	HammondCare is willing to accept a condition of consent in relation to this item.
8. <i>Historical Archaeology (a)</i> – The Applicant shall nominate a suitably qualified and experienced historical archaeologist to manage the historical archaeological program according to the following conditions. This person must fulfil the Heritage Council's Excavation Director Criteria (2019) for the excavation of locally significant archaeological sites.	HammondCare is willing to accept a condition of consent in relation to this item.
9. <i>Historical Archaeology (b)</i> An Archaeological Research Design and Excavation Methodology shall be prepared to guide the archaeological program. It shall be prepared according to Heritage Council of NSW guidelines. This document shall be submitted for comments to the Heritage Council of NSW prior to approval by the Department of Planning Industry and Environment (DPIE).	HammondCare is willing to accept a condition of consent in relation to this item.
10. <i>Historical Archaeology (c)</i> The Applicant must ensure the results of the archaeological program are written up in a final excavation report outlining opportunities and for conservation in situ (as a preference) according to significance, development and interpretation. The final archaeological excavation report shall be prepared within 12 months of the completion of archaeological excavation. It should include details of any significant artefacts recovered, where	HammondCare is willing to accept a condition of consent in relation to this item.

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<p>they are located and details of their ongoing management, conservation and protection in perpetuity by the land owner. Copies of the final excavation report shall be provided to the Department of Planning, Industry and Environment (DPIE), the Heritage Council of NSW and to the local Council's local studies unit.</p>	
<p>3. Environment, Energy and Science (EES)</p>	
<p><u>Biodiversity</u> EES has assessed the revised BDAR and considers the BDAR to be adequate and that all the biodiversity related comments in the previous OEH submission have been adequately addressed.</p>	<p>Noted.</p>
<p><u>Landscaping</u> The previous AIA indicated 131 trees were nominated for removal. The OEH submission on the Environmental Impact Statement (EIS) encouraged Greenwich Hospital to increase the urban tree canopy cover. In response, the RTS indicates amendments to the proposed development include increased tree retention and planting of additional vegetation to achieve a net increase in tree canopy cover (page 7). It is noted the revised AIA recommends removal of 86 trees and the RTS states an additional 48 trees are being retained and protected and that at least 60 new trees will be planted resulting in a net increase of at least 5 trees at ground level (pages 5 and 14).</p>	<p>Noted.</p>
<p>EES notes the AIA proposes to retain invasive exotic trees at the site including:</p> <ul style="list-style-type: none"> • 6 x Camphor Laurel (Cinnamomum camphora) - (see Table 1, tree numbers 1, 60,61,67, 68,252) • 2 x Chinese Tallowood (Triadica sebifera) - (see Table 1, tree numbers 158, 201). <p>It is unclear why the AIA proposes to retain some invasive tree species and it also proposes to remove the same species, for example, six Camphor Laurels are proposed to be removed (see Table 1, tree numbers 8, 32,146,191,192,248 in AIA) and six are proposed to be retained.</p>	<p>Redgum Horticultural has prepared a statement addressing this matter. The reasons for the retention of each species is noted against individual tree descriptions in the Arboricultural report.</p>
<p>Prior to approving the AIA, Architectural drawings (Appendix A) and Landscape Concept Proposal for the site, it is suggested the Department considers information that is available relating to the exotic trees which are proposed to be retained. For example, the NSW Department of Primary Industries website (DPI NSWWeedwise) indicates:</p> <ul style="list-style-type: none"> • Camphor Laurel is a highly invasive exotic species. It has prolific seed production, birds and other fauna readily eat the fruit and disperse the seeds and it has a tendency to form single species communities and exclude most other tree species, including native vegetation - see DPI Weedwise link: https://weeds.dpi.nsw.gov.au/AA/eeds/CamphorLaurel 	<p>Noted.</p>

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<ul style="list-style-type: none"> Chinese Tallowood or Chinese fallow tree (<i>Triadica sebifera</i>) is fast becoming an invasive environmental weed of watercourses and native vegetation areas. Each tree produces thousands of seeds that can remain dormant for many years. It is also able to alter the chemical composition of the soil, enhancing conditions for further seed germination and rapid plant growth. This allows it to replace native species in a relatively short period of time - see DPI Weedwise link: https://weeds.dpi.nsw.gov.au/Weeds/ChineseTallowTree 	
<p>The AIA also proposes to retain other exotic trees such as Hackberry (<i>Celtis</i>) (see table 1, tree numbers 112, 147B) and Hawthorn (<i>Rhaphiolepis</i> sp.) (see table 1, tree number 239). The proponent needs to clarify if Hackberry (<i>Celtis</i>) is <i>Celtis sinensis</i> and if Hawthorn (<i>Rhaphiolepis</i> sp.) is Indian Hawthorn (<i>Rhaphiolepis Indica</i>) as the BDAR records <i>Celtis sinensis</i> and Indian Hawthorn as occurring by plot (see Table 30, Appendix B, pages 64 and 66).</p> <p>The DPI NSW Weedwise link indicates:</p> <ul style="list-style-type: none"> <i>Celtis sinensis</i> is a large, invasive tree that has become an environmental weed, and that it rapidly colonises disturbed bushland, forms dense thickets, replaces native shrubs and trees and dominates riparian vegetation. <i>Celtis sinensis</i> has been recognised and listed as a serious environmental weed by bush regeneration groups - see DPI Weedwise link: https://weeds.dpi.nsw.gov.au/Weeds/ChineseCeltis Indian hawthorn is regarded as an environmental weed in NSW and it is mainly a problem in remnant bushland in the Sydney region. The fruit of this plant is highly desirable to birds and can be easily dispersed into the environment and can also be spread by water - see DPI Weedwise link: https://weeds.dpi.nsw.gov.au/Weeds/IndianHawthorn 	<p>Redgum Horticultural has prepared a statement addressing this matter. The reasons for the retention of each species is noted against individual tree descriptions in the Arboricultural report.</p>
<p>The Greater Sydney Regional Strategic Weed Management Plan 2017-2022 published by Greater Sydney Local Land Services and developed in partnership with the Greater Sydney Regional Weed Committee lists Camphor Laurel, Chinese fallow, <i>Celtis sinensis</i> and <i>Rhaphiolepis Indica</i> as weeds of regional concern.</p>	
<p>The spread of seed from these invasive trees from the site is a concern, particularly as the site adjoins Gore Hill Reserve to the south west, which contains a densely vegetated area of bushland and includes the riparian corridor of Gore Creek. It is recommended:</p> <ul style="list-style-type: none"> invasive exotic species are removed from the site and replaced by local native provenance species and a condition of consent is included to this effect. As recommended in Table 21 of the BDAR, any resident fauna should be relocated in a sensitive manner under the supervision of a qualified ecologist/licensed wildlife handler 	

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<ul style="list-style-type: none"> the proponent provides the Department with a revised total number of trees that are proposed to be removed from the site and clarifies if the proposed planting on the site still exceeds tree removal. 	
<p>OEH recommended the landscaping at the site uses a diversity of native trees, shrubs and groundcover species from the relevant local native vegetation communities (local provenance material) that occur or once occurred in this location to improve biodiversity rather than use exotic species and non-local native species. The RTS indicates the proposed landscape character feature indigenous native mature planting to the boundary zones (section 2.6.2, page 22) and it is noted the BDAR includes a mitigation measure that landscaping in the development site is to use locality derived native species and those found within the Plant Community Type (PCT) present (page 45).</p>	
<p>Where cultural planting is not required at the site for heritage reasons, it is recommended a condition of consent is included which requires local native provenance species to be planted from the relevant PCTs which occur or once occurred on the site.</p>	<p>HammondCare is willing to accept a condition of consent in relation to this item.</p>
<p><u>Asset Protection Zone</u> The RTS clarifies that there is no requirement for almost the entire site to be maintained as an Inner Protection Area (IPA) and that the RFS has excluded the rainforest vegetation in the southwest corner of the site which adjoins Gore Hill Reserve from the requirement to be maintained as an IPA.</p>	<p>Noted.</p>
<p><u>Recommended conditions of consent</u> EES recommends that if the SSD is approved the following conditions are included: 1. All mitigation measures listed in Table 21 of the BDAR must be implemented.</p>	<p>HammondCare is willing to accept a condition of consent in relation to this item.</p>
<p>2. Invasive exotic species are to be removed from the site and replaced by local native provenance species.</p>	<p>HammondCare is willing to accept a condition of consent in relation to this item.</p>
<p>3. Trees removed by the development shall be replaced by a diversity of local native provenance species at a ratio greater than 1:1.</p>	<p>HammondCare is willing to accept a condition of consent in relation to this item.</p>
<p>4. Enough area/space is provided on site to allow the trees to grow to maturity.</p>	<p>HammondCare is willing to accept a condition of consent in relation to this item.</p>
<p>5. Tree planting at the site shall use advanced and established local native provenance trees with a minimum plant container pot size of 75-100 litres, or greater for local native tree species which are commercially available. Other local native tree species which are not commercially available may be sourced as juvenile sized trees or pre-grown from provenance seed.</p>	<p>HammondCare is willing to accept a condition of consent in relation to this item.</p>
<p>6. Where cultural planting is not required on the site for heritage reasons, the landscaping at the site shall use a diversity of local native provenance trees, shrubs and groundcover species (rather than exotic species or non-local native</p>	<p>HammondCare is willing to accept a condition of consent in relation to this item.</p>

Issue	Response
species) from the relevant Plant Community Types which occur or once occurred on the site.	
<p>7. The Landscape Plan shall include details on:</p> <ul style="list-style-type: none"> a) the Plant Community Types that occur or once occurred on the site b) a list of local provenance tree, shrub and groundcovers to be used in the landscaping c) the quantity and location of plantings d) the pot size of the local native trees to be planted e) the area/space required to allow the planted trees to grow to maturity f) Plant maintenance. The planted vegetation should be regularly maintained and watered for 12 months following planting. Should any plant loss occur during the maintenance period the plants should be replaced by the same plant species. 	HammondCare is willing to accept a condition of consent in relation to this item.
8. Habitat features such as nest boxes shall be installed at the site to improve biodiversity.	HammondCare is willing to accept a condition of consent in relation to this item.
9. Tree trunks (greater than approximately 25-30cm in diameter and 3 m in length) from native trees to be removed shall where possible be salvaged and used in the landscaped areas on the site.	HammondCare is willing to accept a condition of consent in relation to this item.
4. Environment Protection Authority	
<p>On the basis of the information provided, the proposal does not constitute a Scheduled Activity under Schedule 1 of the Protection of the Environment Operations Act 1997 (POEO Act). The EPA does not consider that the proposal will require an Environment Protection Licence (EPL) under the POEO Act.</p> <p>Accordingly, the EPA has no comments regarding the proposal and has no further interest in this proposal.</p>	Noted.
5. Transport for NSW	
<p>The Response to Submissions (RtS) report states that the bus stops located outside the site's north western boundary are the nearest facilities to be used by the Senior Living residents. The proponent also confirms the preferred route, as presented in Figure 3 of the RtS report is suitable for people with disability accessing between the bus stops and the site. On this note it is recommended that adequate way-finding signage and strategy should be provided to the future residents of the proposed development.</p>	Noted. Adequate wayfinding will be provided to future residents of the proposed development.
6. Transport for NSW (Roads and Maritime Services)	
<p>Transport for NSW advises that the comments provided in the previous letter dated 22 March 2019 remains applicable (see Attachment 1).</p>	Noted.