

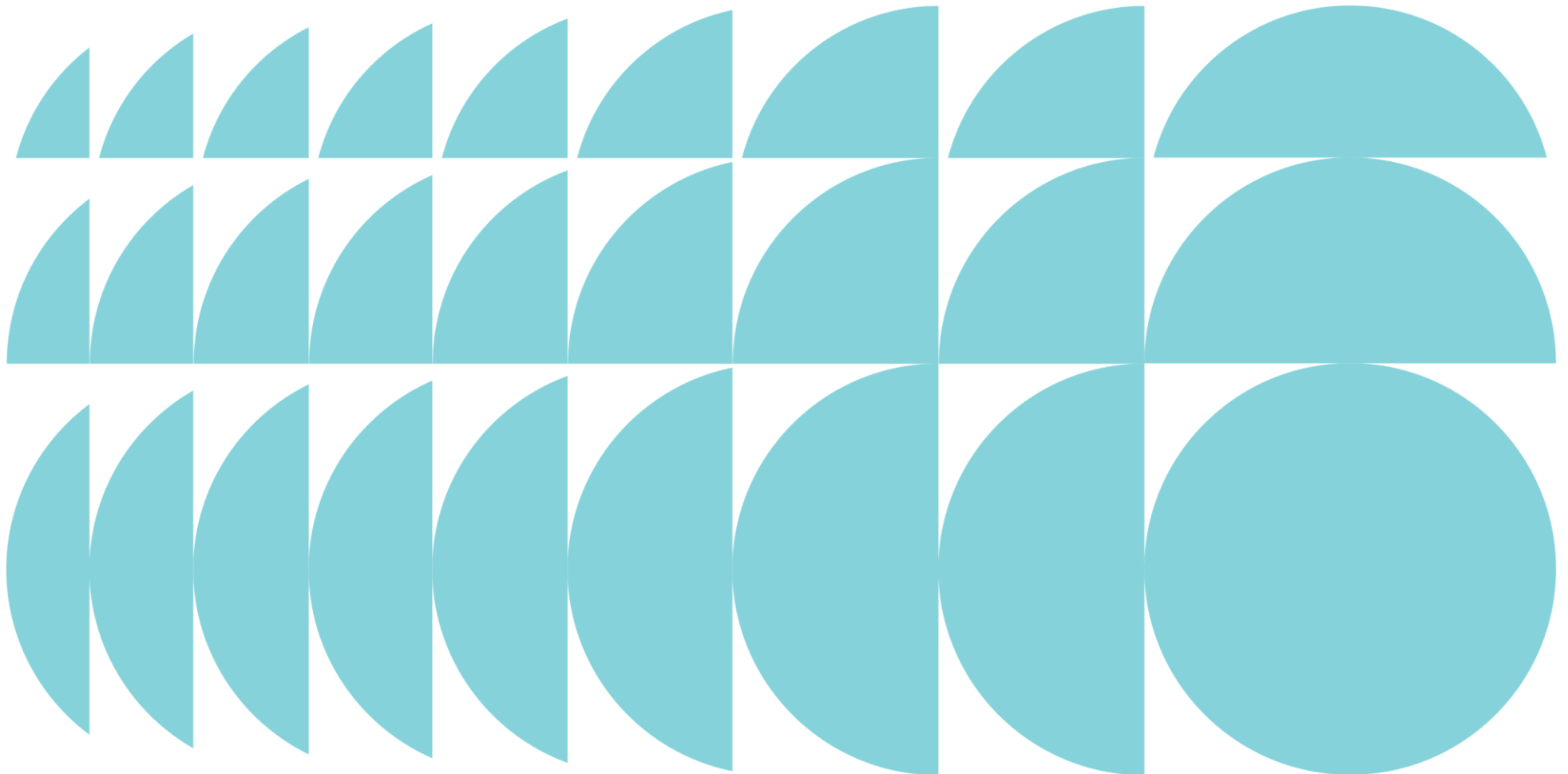
ETHOS URBAN

Response to Public Submissions 2

Redevelopment of Greenwich Hospital

Submitted to Department of Planning, Industry and
Environment

19 June 2020 | 2190376



The following is a response to all 131 submissions made by the general public, including individuals and groups. Points raised have been categorised into 71 different issues, alongside a summary of points raised for each issue and the amount of times the issue was raised. The proponent's responses have been informed by input by the expert consultant team.

Summary of Issue	Response	No. of times raised
Bulk and Scale		
<p>Bulk and scale of the revised Hospital building remains unsympathetic/out of place with the surrounding residential urban context</p>	<p>As noted in Section 2.2 of the covering RTS Report submitted as part of the previous Response To Submissions (RTS) package, the design of the hospital building envelope has been modified to reduce the building's appearance of bulk whilst retaining the fundamental functional and feasibility requirements of the development. A further 'flattening' of the building will result in an inefficient low-rise development with high site coverage and requires removal of far more trees. Instead, the large size of the site provides the opportunity to concentrate the bulk of the buildings within the middle of the site, where it has the least amount of impact.</p> <p>It is noted that OEH has reviewed the amended design and notes that whilst the height has not been reduced, that the changes to the western end of the seniors living building and the modifications to the podium and southern side of the hospital reduce the impacts of the scheme and improve the relationship of the buildings with its surrounding heritage context. The OEH submission concludes that this is now considered appropriate.</p>	56
<p>Bulk and scale of the revised Seniors Living uses remain unsympathetic/out of place with the surrounding residential urban context</p>	<p>The bulk and scale 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 in response to community concerns.</p> <p>The current level of Seniors Living uses proposed on-site is the minimum necessary to ensure the long-term financial sustainability of Greenwich Hospital and ensure that a high level of health care options is continued to be provided to the community, including the specialised health care services offered by HammondCare's innovative 'continuum of care' model. It is important to note that the capital for this project is fully funded by HammondCare who relies on revenue from its operations, donations and government grants to fund their important operations and healthcare services.</p> <p>A further reduction of Seniors Living uses from the amended scheme would result in the redevelopment of the Hospital being unviable and therefore the significant health care services proposed would not be delivered. 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. This is further addressed under Section 2.1.2 of the RTS Report.</p> <p>As above, it is 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>	60
<p>Overdevelopment of the site</p>	<p>The modified scheme minimised the scope and scale of the proposal to better integrate the built form with its surrounds. As detailed at Section 2.1 of the RTS, however, there are minimum GFA and design requirements necessary to ensure the viability of the Hospital redevelopment. A further reduction of the bulk and scale of the scheme, from that as amended under the previous RTS package, would result in an inefficient low-rise development which has excessively high site coverage and requires removal of far more trees. In this regard, the primarily vertical typology is necessary as a smaller sprawling design would result in insufficient operations and excessive distances having to be travelled by staff to reach patients.</p>	21

Summary of Issue	Response	No. of times raised
	<p>Furthermore, it is noted that Lane Cove Council has expressed in-principle support for a redevelopment of the existing Hospital and expansion of facilities to meet future demand and recognises the need for additional Seniors living facilities in the broader area. Several submissions have also recognised the need for greater health services in the area to meet the demands of the ageing community. The large SP2 zoned site provides an opportunity to deliver HammondCare's unique continuum of care model to support the changing health care needs of the community which would be unfeasible in other locations due to competition with higher order uses available within broader land use zones.</p>	
Buildings exploit lack of height limit	<p>This matter has been addressed at Section 2.2.2 of the RTS. It is noted that there is no applicable height limit under the SP2 Infrastructure zoning of the site which is often the case for special infrastructure zones and which accounts for functionality being the primary consideration in its design. As mentioned above, the height of the hospital building is a necessity ensure and promote efficient circulation (amongst other benefits) given life safety considerations. A low-rise and sprawling Hospital campus represents an inefficient use of the site, in addition to introducing safety risks.</p>	1
Development height inconsistent with surrounding residential R2 zoning	<p>Section 2.2 of the covering RTS Report submitted as part of the previous RTS package provides further discussion and analysis of this issue. 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. The Greenwich Hospital site has undergone an extensive masterplanning 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 provide a transition in built form to surrounding development.</p> <p>The building envelopes of the RTS scheme have also been amended to provide a more appropriate transition in scale to adjacent residential development, in particular to properties to the west and south of the site.</p>	54
Height of proposed development is inappropriate considering proximity to bushland	<p>As noted in the previous RTS report, the proposed height of the development will not result in adverse environmental impacts or damage to the adjacent bushland. Rather, it will minimise impacts by concentrating mass away from areas of vegetation. As part of the previous RTS package, a Bushfire Assessment Report was appended at Appendix G, which complimented the Bushfire Hazard Assessment located within the original EIS package at Appendix J. The reports found that a reasonable and satisfactory level of bushfire protection is provided for the proposed development. Additionally, further bushfire and fire management arrangements, including a Vegetation Management Plan, will be submitted as part of a subsequent detailed design application.</p>	4
The proposed bulk and scale represent an inappropriate increase compared to the current existing built form	<p>As previously outlined at Section 2.2 of the RTS report, an intensification of uses is required to optimise the use of the strategically located site in order to accommodate the future projected healthcare requirements of the community. By 2031, the number of people aged 65 or older in northern Sydney is expected to increase to 18% of the population and the need for specialist dementia care is estimated to double in NSW by 2051. The overarching objective of the development is to enable this demographic to continue to live well and maintain independence as they age. This is reflected in the Greenwich Health Campus Vision attached to the previous RTS package at Appendix C, highlighting the objectives and necessity of the proposal.</p> <p>It is also noted that Lane Cove Council has in their response indicated their in-principle support for a redevelopment of the existing Hospital and an expansion of facilities to meet future demand, in addition to noting the need for additional Seniors living facilities in the broader area. There are a limited number of suitable sites to provide such facilities in the LGA and</p>	4

Summary of Issue	Response	No. of times raised
	therefore it is important to optimise the use of this site to address the exiting and projected health care needs of the community.	
Visual Impact		
Loss of visual amenity and/or will dominate the skyline of the area	<p>The proposed design incorporates a suite of changes made as part of the previous RTS response intended to minimise loss of visual amenity and reducing the impact of the proposal on the skyline of the area. A Visual Impact Assessment was prepared by Clouston Associates at Appendix I of the previous RTS package, concluding that the overall visual impact of the redevelopment is considered to be acceptable. It was found that the scheme, as amended by the previous RTS, strikes an appropriate balance between providing the necessary floor space and functional requirements for the Greenwich Campus and minimising the impact of the bulk and scale of the building envelopes on other uses in the vicinity of the development, in accordance with Clause 25(5)(b)(v) of SEPP Seniors.</p> <p>It is considered that any further reductions to building envelopes would not result in substantive improvements with regards to visual impact to justify the wider cost of reducing the design, functional and financial attributes of the health care campus. It should also be recognised that that Visual Impact Assessment represents the maximum possible permitted building envelopes, which will be refined as part of a future detailed design application.</p>	47
Loss of visual amenity from Bob Campbell Oval	The Visual Impact Assessment prepared by Clouston Associates located at Appendix H of the previous RTS package has found there to be only a moderate visual impact when viewed from Bob Campbell Oval (Gore Creek Reserve), with the scale of the change being characterised as negligible and the overall view impact rating as moderate. The VIA states that the majority of the Seniors Living Units will be obscured from this location and although the built form will still be perceptible close to the skyline, it will not create an overbearing presence.	16
Loss of visual amenity from Northwood / Upper Cliff Rd	<p>The design of the development was amended under the previous RTS package to minimise loss of visual amenity from Northwood. This includes a reduction in size and scale of the seniors living buildings to better integrate with surrounding built forms to the west of the site, and increasing the setbacks to the western boundary by approximately 5m and stepping down the façade of the building at this interface to reduce the perceived bulk from the public domain and immediate neighbours.</p> <p>The Visual Impact Assessment prepared by Clouston Associates recognises that the proposal will increase the perception of the built form from this location when compared to the existing development and recommends that the most appropriate form of mitigation would be in built form articulation and material selection during the detailed design process and landscaping. The report also suggests that strategic planting could be considered on affected private properties to filter views of the proposal if considered necessary. This option could be considered further as part of the detailed design process through consultation with the affected properties.</p>	18
Visual impact assessment is misleading/inaccurate	The methodology used for the Visual Impact Assessment is outlined at Section 2 of the report and is consistent with the NSW Land and Environment Court Planning Principles. The viewpoints selected for the assessment were based on key locations from the surrounding public domain and representative views from private residences. These viewpoints were selected in consultation with the DPIE.	9

Summary of Issue	Response	No. of times raised
Construction		
Construction noise / noise pollution	The proposed development is for a Concept Plan only and construction impacts will be mitigated in accordance with a Construction Management Plan to be submitted as part of a subsequent detailed design application, when details of the development are finalised.	4
Dust and air pollution		2
Construction vehicles and trucks will exacerbate traffic		2
Environment		
Tree and bushland removal (general)	As noted in the previous RTS response, the proposed development as amended aims to maximise the retention of existing significant vegetation and provide new planting to increase the existing tree canopy. As noted below, the proposed development will result in a net increase of 5 healthy trees at the site (discounting trees which are structurally compromised and are required to be moved irrespective of the proposal). This is consistent with Planning Priority N19 of the <i>North District Plan</i> which aims to increase urban tree canopy cover. Overall, the landscaped area of the site as amended will increase by 8% (to 20,000m ² or approximately 60% of the site area) compared to the original proposal and the deep soil zone will increase by 15% to 13,800m ² . Further information on vegetative removal is provided within the Arborist Report prepared by Redgum Horticultural and appended to the previous RTS package at Appendix F. It is considered that the removal of these trees is appropriate given their proposed replacement as part of a high quality landscape strategy, and in the context of broader community benefits delivered by the site's redevelopment.	81
The proposal will not result in a net increase in the number of trees	<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 previous 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>In addition it is noted that HammondCare is willing to commit to the retention of significant Tree 167.</p>	6
Impact on flora and fauna / biodiversity impacts	<p>As above, the current scheme as amended aims to maximise vegetative retention, including through the planting of 60 new trees. This includes retaining all vegetation to the southwestern corner of the site adjacent to Gore Creek Bushland Reserve, where no major works are proposed, to minimise impacts on flora and fauna habitats as a result of the proposed redevelopment of the site.</p> <p>A new Biodiversity Development Assessment Report (BDAR) prepared by a new consultant, Ecological Australia, was included as part of the previous RTS package at Appendix M. The report considered the potential biodiversity impacts of the proposed development, assuming a worst-case scenario. The subsequent detailed design application will endeavour to reduce environmental impacts wherever possible, particularly in relation to vulnerable flora and fauna.</p>	29

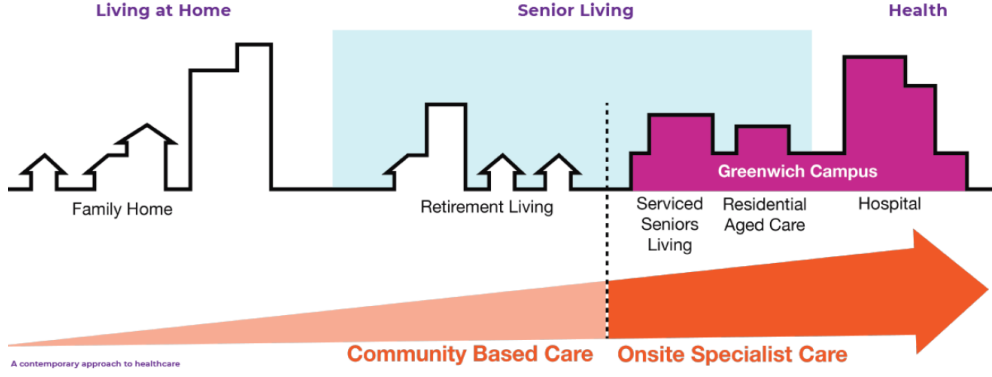
Summary of Issue	Response	No. of times raised
Impact on trees off-site	Trees located off-site will not be impacted by the proposed development. The Arborist Report prepared by Redgum Horticultural and appended to the previous RTS package at Appendix F included a Tree Management Plan (TMP) which details measures to be taken to protect all trees retained and ensure they will not be adversely impacted by the construction works, including through the establishment of Tree Protection Zones (TPZs). Further tree protection measures will be detailed as part of a subsequent detailed design application.	5
Environmental damage to E2 Gore Creek Bushland Reserve as a result of construction	As aforementioned, no adverse environmental impacts are envisaged for Gore Creek Bushland Reserve as a result of the proposed development. All vegetation to the southwestern corner of the site adjacent to the Reserve are proposed to be retained, with no major works taking place in this area. A Construction Management Plan will form part of the subsequent detailed design application which will detail measures to protect off-site vegetation.	13
Environmental damage to Bob Campbell Oval	Measures will be outlined as part of the subsequent detailed design application to prevent environmental damage to Bob Campbell Oval during construction and ongoing works.	2
Loss of vegetation buffer to surrounding residential properties	The proposed development aims to minimise vegetation loss, including with regards to the vegetation buffer between the site and surrounding residential properties. Generally, all development maintains or increases existing setbacks to boundaries (with the exception of the respite care facility and some works along River Road) which allows all trees between the existing access road and residential properties along Gore Street to the south of the site to be kept. Furthermore, existing vegetation between the proposed seniors living facilities and residential properties to the west of the site will predominantly be kept, to provide suitable screening to those properties.	5
Fire Hazard		
Site is next to Gore Creek Reserve which is a bushfire hazard / AFS Asset Protection zone tree removal	A Bushfire Assessment Report prepared by Bushfire Code and Bushfire Hazard Solutions was appended to the previous RTS package at Appendix G. Furthermore, the proposed development is for a Concept Plan only and further details with regard to bushfires and fire management arrangements, including that of a Vegetation Management Plan, are to be submitted as part of a subsequent detailed design application, when details of the development are finalised.	24
Bushfire design / fire management arrangements are unclear		2
The 8m wide access road has been removed without consultation with RFS.	Confirmation has been provided from Building Code and Bushfire Hazard Solutions that the access road is compliant. This matter will be further addressed at the detailed design stage.	1
Heritage		
The development will result in adverse impacts to Pallister House (general)	The revised scheme submitted as part of the RTS package includes a suite of amendments to the originally submitted design aimed at minimising impacts on Pallister House. This involves modifying the built form of the hospital building with regards to reducing the scale of its western end, providing a 1-2 storey projecting built form along its lower section, and revising the geometry of the building to better integrate and forming a stronger visual relationship with Pallister House, and to improve sightlines to Pallister House from River Road. Furthermore, the southern seniors living building now steps down to provide a smaller and simpler backdrop to Pallister House. Importantly, OEH has indicated broad support for the proposed amended design and acknowledges the improvement of the proposal in relation to Pallister House. This includes the removal of the seniors living villas and introduction of the Respite building, modifications to the Hospital and western seniors living buildings, the reconfiguration of the basement carpark, and the preparation of a landscape concept proposal and interpretation plan, which was all considered by the Heritage Council of NSW to be acceptable.	16

Summary of Issue	Response	No. of times raised
Hospital building will overshadow / dominate Pallister House	As above, the revised scheme involves significant alterations to the built form of the hospital building to minimise visual impacts on Pallister House. The Heritage Council of NSW has in their submission indicated these arrangements to be appropriate.	19
Location of Respite Centre is inappropriate / encroaches / negatively impacts on Pallister House	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 OEH in relation to retaining views to Pallister House from the main approach to the building. OEH, in their response to the RTS, further found such arrangements to be appropriate, noting that the amended proposal includes a respite building which is amply screened by trees and will not be readily viewed from this access drive.	15
Insufficient information to assess Respite Centre facility	The proposed development is for a Concept Plan only. Further details with regards to the respite centre are to be submitted as part of a subsequent detailed design application.	3
Removal of historic sandstone walls around Pallister House inappropriate	No sandstone walls within the curtilage of Pallister House are to be removed as part of the application.	1
Land and gardens of Pallister House will be damaged / destroyed	The proposed development aims to enhance the heritage setting of Pallister House through landscaping works. As part of the RTS package, a Concept Landscape Plan was prepared by Taylor Brammer at Appendix L. The landscaping will improve the heritage setting of Pallister House, with a range of cultural planting associated with Pallister House to provide a period garden that contributes to the curtilage of the building and enhances the interface with the proposed surrounding built form. This results in a positive heritage impact, enhances permeability and adds to the rich landscaped character of the site, as confirmed in OEH's submission where it was found to be appropriate.	4
Inadequate protection / encroachment upon Lot 4 as a whole, not just Pallister House	No development is proposed on Lot 4 under the revised scheme except for the Respite Care Facility which is located a significant distance away from Pallister House, to the north of the existing driveway. This arrangement is considered appropriate by the OEH in their submission.	8
Impact on Greenwich Public School		
Increased vehicle/pedestrian traffic will negatively impact health and safety of students	A Traffic and Parking Impact Assessment was submitted with the original application which concludes that the proposed development is not expected to result in significant adverse impacts on the surrounding public road network that will require mitigation. It is noted that improvements to the pedestrian pathway and the eastern vehicular entry will improve sightlines and safety to pedestrians. Further traffic forecasting and assessment will be provided as part of a subsequent detailed design application, which will also include a Construction Management Plan that will include provisions to minimise construction impacts on the ongoing operation of Greenwich Public School.	54
Children may be endangered by construction works	The proposed development is for a Concept Plan only. A subsequent detailed design application will include a Construction Management Plan that will include provisions to minimise construction impacts on the ongoing operation of Greenwich Public School and mitigate any safety issues that may arise.	2
Proposed development will exacerbate lack of parking for parents accessing the school	A Traffic and Parking Impact Assessment was submitted with the original application which concludes the proposed parking levels are sufficient for the proposed development and all parking for visitors can be accommodated on-site. This matter will be further addressed as part of the subsequent detailed design process.	6

Summary of Issue	Response	No. of times raised
Infrastructure		
Lack of upgrades to sewer/water/power infrastructure, which may not cope with extra demand	The proposed development is for a Concept Plan only and details with regards to site servicing and infrastructure will be submitted as part of a subsequent detailed design application. It is noted that the application relates to a current health service facility and therefore all necessary services are currently available at the site.	1
Insufficient public transport	<p>The proposed development is considered to have sufficient public transport connections with regards to the proposed uses. Specifically, SEPP Seniors requires, under 'Site-related requirements', that seniors living developments in Greater Sydney have access to a public transport service which runs at least once between 8am and 12pm per day and at least once between 12pm and 6pm each day from Monday to Friday and allows residents to access retail, commercial, and community services. The site is served by the 261 and 265 bus services which both at least hourly during weekday daylight hours and connect to the Chatswood, Lane Cove, North Sydney and CBD service centres, and therefore significantly exceed the public transport requirements of SEPP Seniors.</p> <p>It is also noted that TfNSW has reviewed the amended proposal which clarifies the preferred future route to the bus stop is suitable for people with a disability. Accordingly, TfNSW recommend that adequate way-finding signage be provided to future visitors to the facility. This will be addressed as part of the subsequent detailed design process.</p>	21
Stormwater impacts of the proposed development on bushland below	As part of the RTS package, an Overland Flow Assessment was prepared by WGE and appended at Appendix Q, confirming that the proposed development does not obstruct any overland flow paths and will have no impact on overland and stormwater flow, and no further mitigation measures are considered to be required.	6
Infrastructure such as traffic cannot cope with cumulative impact of all developments in area	A Traffic and Parking Impact Assessment was submitted with the original application which concludes the proposed development will not result in adverse impacts on the surrounding public road network. As the amended scheme represents a reduction in GFA compared to that of the original, re-assessment is not required at this stage, however a Traffic and Parking Impact Assessment will be submitted as part of the subsequent detailed design application. The subsequent application will also confirm that adequate service infrastructure is provided to support the development.	9
Loss of privacy		
Inadequate setbacks to residential properties	The proposed seniors living buildings contain generous setbacks and exceed the building separation requirements prescribed under Section 3F – Visual Privacy of the Apartment Design Guide (ADG). The minimum 20.8m setback from a side or rear boundary under the proposed scheme is significantly greater than the minimum 12m setback required by the ADG. An ADG Compliance Table was prepared by Bickerton Masters and included at Appendix P of the previous RTS package confirms this.	13
Seniors Living buildings will allow for lines of sight into backyards and bedrooms	As mentioned above, the proposed development contains generous setbacks in exceedance of ADG requirements to minimise privacy impacts on neighbouring residences. Issues relating to privacy will be further explored as part of a subsequent detailed design application.	18
Light pollution on surrounding residents	The proposed development is for a Concept Plan only and light pollution mitigation measures, if required, will be addressed in a subsequent detailed design application.	18
Noise		
Proposed development will generate noise pollution (general)	An Acoustic Assessment was prepared by Acoustic Logic and submitted at Appendix Q of the original EIS application, noting that the operation of the proposed redevelopment complies or is capable of compliance with the relevant noise	16

Summary of Issue	Response	No. of times raised
	guidelines, subject to further acoustic assessment during the subsequent detailed design stage when the site design is finalised, and the acoustic treatments and recommendations given within the document are implemented.	
Increase in traffic will generate noise pollution	Section 6.2.2 of the Acoustic Assessment prepared by Acoustic Logic and submitted in Appendix Q of the original EIS application assessed the acoustic impacts of likely noise generated by additional traffic on public roads. Overall, it was found that the additional noise generated is not significant and complies with the EPA Road Noise Policy.	2
Hospital operations will generate noise pollution, including at night	<p>The proposed development is for a Concept Plan only and therefore a detailed acoustic review of hospital operations is not currently possible as plant selections and locations are not finalised. Nevertheless, Section 6.2.3 of the Acoustic Assessment prepared by Acoustic Logic and submitted in Appendix Q of the original EIS application assessed the likely acoustic impacts of noise generated by hospital operations, including typically noisy plant items including cooling towers, fan coil units and fans, chillers, and the emergency backup diesel power generator.</p> <p>Overall, it is considered that these plant items, after the implementation of the necessary acoustic recommendations provided in the report (to be confirmed in a subsequent detailed design application), comply or are capable of compliance with all EPA amenity noise limits.</p>	3
Gore Creek Reserve echoes and amplifies sound – will worsen noise pollution	The Acoustic Assessment was prepared by Acoustic Logic concludes that the operation of the proposed development complies or is capable of compliance with the relevant noise guidelines, subject to further acoustic assessment during the subsequent detailed design stage when the site design is finalised, and the implementation of the acoustic treatments and recommendations given within the document.	4
Overshadowing		
The development will result in excessive overshadowing	As part of the previous RTS package, shadow diagrams of the amended design were prepared by Bickerton Masters and attached at Appendix A, demonstrating that only minimal overshadowing will be generated by the proposed building envelopes outside of the site.	16
Overshadowing onto Bob Campbell Oval	As part of the previous RTS package, shadow diagrams of the amended design were prepared by Bickerton Masters and attached at Appendix A, demonstrating that no overshadowing will occur onto Bob Campbell Oval.	6
Overshadowing onto Gore Creek Bushland Reserve	As part of the previous RTS package, shadow diagrams of the amended design were prepared by Bickerton Masters and attached at Appendix A, demonstrating that no overshadowing will occur onto Gore Creek Bushland Reserve.	5
Traffic and Parking		
Insufficient parking has been proposed	A Traffic and Parking Impact Assessment was prepared by Barker Ryan Stewart and submitted at Appendix G in the original EIS application, concluding that the proposed provision of parking is appropriate. Parking for the seniors living component complies fully with the rates stipulated in SEPP Seniors.	14
Existing parking already insufficient in the area / overflow from hospital due to lack of parking capacity	A Traffic and Parking Impact Assessment was submitted with the original EIS application at Appendix G, which concludes that the proposed provision of parking is sufficient for the development and all parking for visitors will be accommodated on-site. This report will be updated as required as part of the detailed design application.	11
Increase in traffic on the surrounding road network	As per the Traffic and Parking Impact Assessment submitted with the original EIS application at Appendix G, the proposed development is not expected to result in significant adverse impacts on the surrounding public road network that will require mitigation. It is noted that the amended scheme submitted as part of the RTS reduced the overall GFA proposed.	87

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Design of Access Road from St Vincent's Road is too steep / needs realignment	Architectural and engineering analysis has found the access road to be suitable. Notwithstanding, the proposal is for a Concept Plan only and the final design of the access road from St Vincent's Road will be confirmed and submitted as part of a subsequent detailed design application.	2
Traffic Impact Assessment lacking / is inadequate / understates traffic impacts	A Traffic and Parking Impact Assessment was submitted with the original application and the amended scheme represents a reduction in GFA compared. Therefore a re-assessment of the traffic and parking impacts is not required at this stage, however a full assessment will be submitted as part of the subsequent detailed design application.	11
Property Values		
Negative impact on the value of surrounding property	Property values are not a relevant planning consideration for this application.	5
Seniors Living / Zoning		
Topography of area not appropriate for Seniors Living	The geography of the area is considered to be appropriate for Seniors Living uses. Specifically, the Accessibility Report prepared by Abe Consulting at Appendix E of the previous RTS package confirmed that the proposed development, including with regards to siting, paths of travel and external linkages, is capable of complying with the relevant accessibility requirements, subject to the implementation of their recommendations at the subsequent detailed design phase.	6
Seniors Living not compliant with SEPP 65	A revised Architectural Design Statement prepared by Bickerton Masters was included in the previous RTS package at Appendix O, confirming the proposal's consistency with the Design Quality Principles of SEPP 65. An ADG Compliance Table was also included at Appendix P, demonstrating that the seniors living building envelopes are capable of accommodating future development that is consistent with the ADG.	1
The Seniors Living buildings have little relationship with the Hospital	<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 or require specialised care but want to remain as independent as possible.</p> <p>Typical spectrum of seniors living typologies is shown below. The seniors living uses proposed at Greenwich constitute onsite specialist care as shown in purple to the right. 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>	20

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	 <p>Furthermore, 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 of 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 that will be fully integrated into that of the hospital, sharing the same podium, basement parking and community facilities.</p>	
<p>Residential apartments have been disguised as Seniors Living / May be converted to residential apartments in future</p>	<p>It is important to note that unlike some other forms of retirement living, the seniors living accommodation proposed for Greenwich Hospital will all be offered on a licensed basis. As such, HammondCare will retain ownership of all units which will not be able to be Strata subdivided and sold off to individuals. Being designed as specialist seniors living accommodation, conversion to general-use residential apartments will also not be possible. However, it is possible for the seniors living buildings to be converted to other health uses if required in the future, as healthcare models continue to evolve.</p>	<p>19</p>
<p>Seniors Living not appropriate for SP2 zoned land; Seniors Living does not qualify as a Health Services Facility</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 discussed above, the seniors living component of the development is an integral part of the health services on offer and its operations cannot be separated from that of the hospital.</p>	<p>76</p>
<p>Seniors Living buildings should not be SSD / Should comprise a separate application</p>	<p>Under Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011 (SEPP SRD), hospitals with a CIV of over \$30 million are considered SSD for the purposes of the EP&A Act. The proposed hospital component exceeds this threshold, with a CIV of approximately \$72,465,000, and is considered SSD in its own right.</p> <p>Seniors living is not listed under Schedule 1 of SEPP SRD, however Clause 8(2)(a) of the SEPP states that where a proposal comprises development that is only partly SSD, the remainder of the development is also declared to be SSD where the SSD and remaining components are 'sufficiently related'. As demonstrated above, a key design principle of the proposed development is the synergy between Hospital and seniors living functions that are both reliant and</p>	<p>15</p>

Summary of Issue	Response	No. of times raised
	complimentary to each other. As a result, the composition, placement and interrelationships of differing functions are carefully considered to form a single, integrated development.	
Seniors Living will reduce capacity for hospital to expand in future	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. Furthermore, as noted above, the design of the seniors living uses allows for potential conversion to health-related uses in the future, if required, and the seniors living will not be Strata subdivided.	33
Seniors Living part of redevelopment remains too large compared to Hospital	<p>The bulk and scale of the 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 in response to community concerns.</p> <p>The current level of Seniors Living uses on-site is necessary to ensure the long-term financial sustainability of Greenwich Hospital and ensure that a high level of health care options is continued to be provided to be community, including that of the specialised health care services offered by HammondCare's innovative 'continuum of care' model. It is important to note that the capital for this project is fully funded by HammondCare, with no public money or government funding provided for capital works on Schedule 3 hospitals. In this regard, HammondCare relies on revenue from its operations, donations and government grants to fund their operations and healthcare services.</p> <p>A further reduction of Seniors Living uses from that as amended will result in the redevelopment of the Hospital being commercially unviable, thereby rendering the entire project unsustainable. This is further addressed under Section 2.1.2 in the covering RTS Report submitted with the previous RTS package.</p>	21
Seniors Living and Hospital co-location is inappropriate	The co-location of seniors living and Hospital uses is integral to HammondCare's 'continuum of care' model, where specialist Hospital care can be given to residents within their home environment, enabling them to age in place and remain connected to their local community. Specifically, as the proposed seniors living uses are intended for older residents aged 75+ with chronic and/or ongoing healthcare needs, the provision of seniors living without an associated Hospital healthcare use is not appropriate.	2
Criteria for residency in Seniors Living not adequately explained	As noted above, the proposed seniors living apartments are intended for elderly residents with chronic and/or ongoing healthcare needs. The proposed development is for a Concept Plan only and further details are to be confirmed as part of a subsequent detailed design application.	9
Additional Seniors Living is not needed in the community / not supported by the community	<p>As noted above, an intensification of uses is required to meet future projected healthcare requirements at the site and the surrounding area. By 2031, the number of people aged 65 or older in northern Sydney is expected to increase to 18% of the population and the need for specialist dementia care is estimated to double in NSW by 2051. The overarching objective of the development is to enable this demographic to continue to live well and maintain independence as they age. This is reflected in the Greenwich Health Campus Vision attached to the previous RTS package at Appendix C, highlighting the objectives and necessity of the proposal.</p> <p>It is also noted that Lane Cove Council has in their response indicated their in-principle support for a redevelopment of the existing Hospital and expansion of facilities to meet future demand and has noted the need for additional Seniors living facilities in the broader area.</p>	2

Summary of Issue	Response	No. of times raised
Seniors Living not compliant with Seniors Living SEPP	A detailed assessment of the proposed development's compliance with SEPP Seniors is given in Section 2.2 of the Report submitted as part of the previous RTS package, confirming compliance with SEPP Seniors.	4
Inconsistent with Planning Controls		
Inconsistency with Lane Cove Development Control Plan 2010	The proposal development, being a State Significant Development (SSD), is not required to comply with the Lane Cove Development Control Plan 2010. Rather the masterplanning exercise facilitated by this Concept Plan will establish the framework for the future development of the site.	3
Accessibility		
Accessibility through the site is not achieved	The Accessibility Report prepared by Abe Consulting at Appendix E of the RTS package confirms that the proposed development, including with regards to siting, paths of travel and external linkages, is capable of compliance with the relevant accessibility requirements, subject to the implementation of their recommendations at the subsequent detailed design phase.	1
Set Precedent		
Will set precedent for further developments / flow on effects (general)	The proposed works are for the purposes of a specialised land use, namely a hospital and associated care facilities, which is reflective of the special land use zoning of the site. It will therefore not set a precedent for future development of other non-comparable land uses.	1
Seniors Living uses will set precedent for high-rise apartments	As above, the proposed seniors living uses are of a specialised nature, to be operated by HammondCare as part of its 'continuum of care' model. The facilities will not be able to be Strata subdivided and sold off to individuals and cannot operate independently from the hospital. Therefore, these facilities are distinct from residential apartments and will not serve as a precedent for further general residential development. It is also noted that the site contains site-specific planning controls which reflect the specialised nature of the development. Surrounding land is bound by different planning controls which any future surrounding development will need to respond to.	1
Inadequate Consultation		
Lack of Social Impact Study / Economic Impact Study	A Social Impact Study is not considered to be necessary for the proposed development, given that being a healthcare redevelopment operated by an independent non-profit for the benefit of the community, no negative social impacts are envisaged. An Economic Impact Study is considered to be unnecessary as being a specialist healthcare land use, there are no surrounding competing land uses which the proposed Hospital redevelopment is expected to detract from. The social and economic impacts of the development will be positive.	1
Site survey inconsistencies impacts on supporting studies, including shadow analysis, landscaping, bushfire, hydraulic flow, vegetation	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.	2
Lack of / Insufficient / Inappropriate community consultation	HammondCare has undertaken an extensive consultation programme with the community and government agencies throughout the preparation of the amended proposal. A Community Consultation Summary Report was prepared by KJA	11

Summary of Issue	Response	No. of times raised
	<p>and included at Appendix S of the RTS package. The document provided an overview of the consultation undertaken to date and more recently, communication in response to individual submissions.</p> <p>HammondCare is also committed to ongoing community and stakeholder engagement throughout the life of the project. It is noted that 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>	
In Support of Proposal		
Supports the proposal (general)	Noted.	6
Hospital redevelopment is supported	Noted.	13
Seniors living specialist care component supported	Noted.	2
Protection of Pallister House is supported	Noted.	2