

3 March 2026

LANE COVE COUNCIL SUBMISSION

Ref: SSD - 13619238-Mod-2

Ms Tanja Ibsen,
Principal Planner, Social and Infrastructure
Assessments Department of Planning, Housing and
Infrastructure

Greenwich Hospital Redevelopment – 95-115 River Road Greenwich

Thank you for the opportunity to comment on the latest s4.55 modification for the redevelopment of Greenwich Hospital Greenwich ([SSD-13619238](#)).

I refer to the above submitted application and can confirm Councils planners and engineers have considered the submitted documentation.

1. Section 4.55 Proposal.

This Modification Application seeks consent for the following:

- Amendments to project staging, with the new hospital building and seniors housing buildings to now be constructed concurrently;
- Amendments to the shared basement and hospital building lower levels, including changes to car parking layout and driveway entrance, level 2 wellness area, level 3 imaging shell space and public lobby, and building plant; and
- Amendments to the seniors housing buildings, involving changes to balcony planter layout for most independent living units.

2. S4.55 works.

The proposed changes to the carpark and driveway including are considered acceptable by Council and no objections are raised.

- Relocation of several car spaces and amendments to linework;
- Amendments to the level 1 pool plant;
- Amendments to bike racks and storage areas (with no change to total numbers);
- Relocation of the level 2 comms room;
- Amendments to vertical circulation within the car park; and
- Amendment to layout near the level 2 entry near the Ceremonial Entrance to enable two-way traffic.

3. Staging on Construction Activities.

As a result of concurrently constructing the new hospital building and seniors housing buildings, the number of Bulk Excavation vehicles would increase from 30-40 vehicles to **75 vehicle movements** per day, and an increase of Structural & Fit Out vehicles from 30-40 vehicles to **55 vehicle movements** per day.

	Bulk Excavation	Structure & Fit-out	External Works
Per Day	75	55	25
Per Hour	9	8	5

Council acknowledges that the revised construction schedule will speed up the overall construction period. The SEE states that construction would be finalized approximately 4 years earlier than the previous schedule. However, the following concerns are raised.

1. The current CTMP approved by the IPC was not endorsed by Council.
2. Council's traffic engineer has reviewed the amended updated CTMP, and **requests the applicant provide further information** on the updated vehicle movements including approximate split between heavy vehicles using River Road and St Vincents Road.
3. Council **does not support the increased use of St Vincents Road for construction truck vehicles**. St Vincent Road is a sensitive local road and a proliferation of large vehicles will detrimentally impact the amenity of the local residents. If St Vincent's Road must be utilized, truck numbers per hour must be quantified.
4. The on-street parking on St Vincents Road must be maintained unless approved for removal by Council Work Zone.

4. Engineer Assets Public Infrastructure.

Lane Cove Council has undertaken a review of the current development consent issued for the Greenwich Hospital State Significant Development Application (SSDA) and has identified a number of substantive issues relating to the management and protection of public infrastructure.

Council formally provided detailed recommendations during the SSDA assessment process. However, due to ambiguity within the final development consent conditions and the absence of clear, enforceable wording reflecting Council's submitted requirements, significant challenges have arisen in regulating and accommodating this development within the Lane Cove Local Government Area (LGA).

Although the project is in its early stages, recent correspondence and technical discussions with the developer and builder have already revealed material differences in interpretation regarding compliance with Council's engineering standards, asset protection requirements, and public domain obligations.

Outlined below are key examples of Council's concerns.

(i) Stormwater Management

Council's Position:

Council's stormwater network includes a major drainage line that currently runs directly beneath the approved significant development footprint. Council raised this matter during the assessment phase and expressed concern regarding the risks associated with retaining the existing stormwater infrastructure beneath the proposed building envelope.

Issue Identified:

The SSDA conditions do not clearly mandate relocation measures consistent with Council's standard engineering practice. As a result, the developer has proposed to undertake construction works on top of the existing stormwater system. Throughout the history of the development Council has twice requested the Department to include standard conditions to protect our stormwater assets.

- 19/11/19 Council Submission Concept Proposal SSD-8699 - Condition (39) Council Drainage Infrastructure.
- 26/10/22 Council submission Detailed Design SSD-13619238 - Condition (39) Council Drainage Infrastructure.

(A8) Council Drainage Infrastructure: The proposed construction shall not encroach onto any existing Council stormwater line or drainage easement unless approved by Council. If a Council stormwater line is located on the property during construction, Council is to be immediately notified. Where necessary the stormwater line is to be relocated to be clear of the proposed building works. Developer must lodge Stormwater Inspection Application form to Council. All costs associated with the relocation of the stormwater line are to be borne by the applicant

Reason: To protect public infrastructure

However, the IPC Determination issued included the below Condition:

Stormwater Management System

- B4. Prior to the issue of the relevant construction certificate, the Applicant must design an operational stormwater management system for each stage of the development and submit it to the Certifier for approval. The system must:
- be designed by a suitably qualified and experienced person(s);
 - be generally in accordance with the conceptual design in the EIS;
 - be in accordance with applicable Australian Standards; and
 - ensure that the system capacity has been designed in accordance with *Australian Rainfall and Runoff* (Engineers Australia, 2016) and *Managing Urban Stormwater: Council Handbook* (EPA, 1997) guidelines.

Council has significant concerns that:

- Major structure may compromise the structural integrity of the stormwater asset.
- Long-term access for maintenance, inspection, and future renewal would be severely constrained if the asset remains beneath the building footprint.
- Any failure of the drainage system in the future could have substantial operational, safety, and financial implications.

Council formally objected to the proposal to retain and work around the existing stormwater

infrastructure. Consistent with Council's standard approach applied to other developments within the LGA, Council recommended the relocation or redirection of the drainage line outside the building footprint. This would ensure:

- Separation between major building works and critical drainage infrastructure;
- Protection of Council's asset;
- Unimpeded long-term maintenance access; and
- Risk mitigation for both Council and the applicant.

Despite this, the absence of a clearly articulated consent condition has resulted in ongoing disagreement regarding the appropriate course of action. Please refer to Figure 1 at the end of this document demonstrating the location of the existing stormwater line and Councils' recommended solution.

(ii) Pedestrian Access and Safety – Senior Living and Hospital Interface

Council understands that the SSDA approval recognises the sensitive nature of this development, particularly given the presence of a hospital, senior living accommodation, and facilities serving people with disabilities. Safe, accessible, and integrated pedestrian connectivity should therefore be a primary design consideration.

While Condition B15 of the SSDA references pedestrian access, it does not clearly define measurable or enforceable requirements. The documentation submitted to Council by the developer in response to this condition does not adequately address safe and inclusive pedestrian outcomes.

SSDA Condition;

Public Domain Works

B15. Prior to the issue of the relevant construction certificate for footpath or public domain works required to address *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004*, as referenced in the *Accessibility Design Review Report*, prepared by ABE Consulting and dated 11 August 2022 and to rectify the kerb ramps at the River Road, the Applicant must demonstrate to the Certifier that the streetscape design and treatment meets the requirements of Council, including addressing pedestrian management. The Applicant must submit documentation of approval for each stage from Council to the Certifier.

Note: Separate construction certificate applications under the Roads Act 1993 are required to be submitted and approved by the relevant roads authority for roadworks or works within the public domain.

Council's concerns include:

- Seniors and persons with disabilities are being directed to utilise road corridors with high vehicular movements, including hospital entry and exit points.
- There is no clearly defined, safe, and accessible connection to the existing pedestrian network.
- There is no comprehensive upgrade plan for surrounding public infrastructure to support vulnerable users in connecting to nearby facilities and services.

- The submitted pedestrian management plan does not reflect best practice principles for universal access, passive surveillance, separation from vehicular conflict points, or compliance with Council's accessibility standards.

Given the demographic profile of users associated with this development, the current approach presents unacceptable safety risks. Without appropriate infrastructure upgrades and clearly defined pedestrian priority measures, the development will compromise user safety and fail to meet reasonable accessibility expectations. Please see attached plan for pedestrian management and email train on this issue.

Council has identified several additional areas requiring clarification and technical resolution. However, in response to Council's concerns, the developer has consistently advised Council to liaise directly with the Planning Department, citing that the development has been approved under the SSDA framework.

While Council acknowledges the State assessment pathway, it must emphasise that the development interfaces directly with Council managed infrastructure and public assets. Council retains statutory responsibilities relating to asset management, public safety, road reserve works, and ongoing maintenance liabilities.

Without appropriate clarification and alignment during the construction phase, this development may result in:

- Long-term asset management risks;
- Increased financial liability for Council;
- Non-compliant public domain outcomes; and
- Significant public safety concerns.

Lane Cove Council has consistently supported housing delivery, healthcare infrastructure, and strategic development within the LGA. However, such support is contingent upon developments meeting established engineering, safety, and public domain standards that protect community interests and public assets.

Council therefore urges the Planning Department to formally reconsider Council's technical position and to direct the applicant to meaningfully liaise with Council to achieve a compliant, safe, and technically sound development outcome.

Early intervention and clear direction at this stage are critical to ensuring that the project proceeds in a manner that safeguards public infrastructure, maintains Council standards, and delivers a safe and sustainable outcome for the community.

Yours Sincerely,



Chris Shortt – Senior Town Planner
Lane Cove Council



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