

11 December 2020

2190376

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

Dear Mr. Betts,

## **REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS SCOPING REPORT – 97-115 RIVER ROAD, GREENWICH**

We are writing on behalf of HammondCare regarding the Greenwich Hospital redevelopment at 97-115 River Road, Greenwich (the site). Following the recent determination of the Concept DA (SSD-8699), HammondCare intends to prepare a State Significant Development (SSD) application for the detailed design and construction of the new Greenwich Hospital which will provide new health care and allied health facilities and integrated, serviced seniors living units.

The proposed development, which incorporates the hospital and seniors living uses, is for a single, integrated development with significant physical and functional links between its uses. The capital investment value of the hospital component is >\$30 million; therefore, the proposed development is SSD in accordance with Clause 14 of Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP).

Although seniors living is not listed under Schedule 1 of SEPP SRD, Clause 8(2)(a) of the SEPP provides 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'.

The purpose of this letter is to request the Secretary's Environmental Assessment Requirements (SEARs) to enable the preparation of an Environmental Impact Statement (EIS) for the proposal. To support the request for SEAR's, this letter provides an overview of the proposal, sets out the statutory context, and identifies the key environmental and planning issues likely to be associated with the proposal. It should be read in conjunction with the Preliminary Architectural Plans prepared by Bickerton Masters (**Attachment A**).

## 1.0 Background

State Significant Development Application (SSDA)-8699 was approved on 10 November 2020 by the Independent Planning Commission for the following:

*Concept proposal for the redevelopment of Greenwich Hospital including:*

- *demolition, earthworks and remediation works;*
- *new health care and allied health facilities and residential aged care and seniors housing in an integrated care campus;*
- *building envelopes, comprising:*
  - *main hospital building envelope with an integrated basement;*
  - *two seniors living building envelopes with an integrated basement; and*
  - *respite care building envelope;*
- *car parking and site access arrangements; and*
- *landscaping, including tree removal.*

An excerpt from the Architectural Plans appended to the SSD-8699 summarising the approved works is provided in **Figure 1** below.



**Figure 1 Overview of the approved scheme under SSD-8699**

Source: Bickerton Masters

The proposed development seeks consent for the subsequent detailed design and delivery of the Greenwich Hospital development, consistent with the Concept DA Approval. This includes a partial relocation and reduction in height of the seniors living building envelopes under Condition A4 of Schedule 2 of the Conditions of Consent, associated reduction in GFA under Condition A5, and the planting of additional new trees under Condition A6.

## 2.0 The site

The site is located within the suburb of Greenwich in the Local Government Area (LGA) of Lane Cove, at 97-115 River Road, and is occupied by the existing Greenwich Hospital development. It is generally rectangular in shape and is approximately 33,760m<sup>2</sup> in size. It is legally described as Lots 3 and 4 in DP 584287. The location of the site is shown in **Figure 2** below.

Greenwich Hospital is owned and operated by HammondCare (the proponent), a non-profit health care provider and independent Christian charity (ACN 48000026219) that specialises in dementia and aged care, palliative care, rehabilitation, and older peoples' mental health.



**Figure 2 Site aerial**

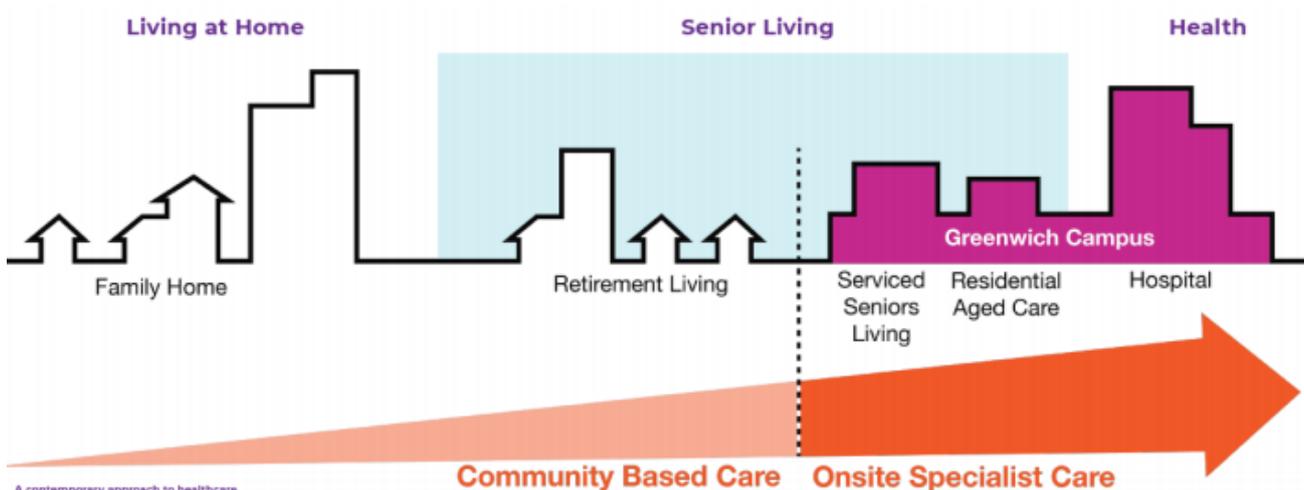
Source: Nearmap, edits by Ethos Urban

Land uses surrounding the site comprise a predominantly residential typology, in addition to Greenwich Public School to the north of the site and Gore Creek Reserve and Bob Campbell Oval to the southwest (**Figure 2**). The site is well served by public transport, including the 261 bus along River Road and 265 bus along Kings Langley Road. The site is also within close proximity to the Pacific Highway and is approximately 1km south-west of St Leonards railway station. The Pacific Highway also provides convenient access to the Sydney Orbital motorway, including Gore Hill Freeway and the Lane Cove Tunnel, for motorists.

## 2.1 Site history and vision

Pallister House was built on the site in 1892 and was originally a private residence. Since this time, the site has been associated with a range of welfare and community activities, including its use as a girl’s home from 1936. Greenwich Hospital was opened on the site by the Minister for Health in 1966. From 1970 to 1997 the hospital continued to evolve into a multi-disciplinary care practice, featuring purpose-built facilities and a combined network of medical specialists.

The long-term vision for the site involves transforming the Greenwich Hospital from a dated 1960s facility which is no longer fit for purpose into an integrated, contemporary healthcare campus. This will incorporate specialised care services for seniors and people with complex health needs to meet the growing community demand in the Northern Sydney Local Health District (NSLHD). The new Greenwich Health Campus moves away from traditional, siloed models of sub-acute services to better respond to the changing needs of the ageing community, consistent with the *NSW State Health Plan – Toward 21* which focuses on delivering integrated and connected health care. This is proposed to be done through HammondCare’s innovative ‘continuum of care’ model (**Figure 3**), involving the expansion and integration of specialised health services, and short, medium and long-term accommodation options.



**Figure 3** Typical modern seniors living typologies – Greenwich Campus shown in purple

Source: HammondCare

### 3.0 Description of the proposed development

The SSDA will propose the demolition of the existing Greenwich Hospital and the construction of a replacement hospital building complex, with integrated serviced seniors living buildings and a respite care facility. Specifically, consent is sought for the following works:

- Demolition of the existing hospital building and associated facilities at the site;
- Construction of a new hospital facility and integrated healthcare uses and services, including:
  - A new main hospital building up to 8 storeys;
  - Two new assisted independent living buildings up to RL 60.65;
  - A new single storey respite care building;
- Construction of associated site facilities and services, including pedestrian and vehicular access and basement parking; and
- Site landscaping and infrastructure works.

Pallister House will continue to be preserved and host dementia care and administrative functions of the Greenwich Hospital complex under the proposed redevelopment.

As shown in the Preliminary Architectural Plans at **Attachment A**, the proposed construction works will be staged. This is to allow the hospital to continue operating during the redevelopment process, and to ensure that the most critical infrastructure (i.e. the new main hospital building) is delivered first before the serviced seniors living and respite care buildings are put into operation, as those uses cannot function without the new hospital. A summary of the proposed staging is provided below:

- **Stage 1:** Demolition of Blue Gum Lodge, Eastern Wing of the existing hospital, and associated carpark (Stage 1.1) and construction of the new main hospital podium and tower (Stage 1.2);
- **Stage 2:** Construction of the remainder of the new main hospital building;
- **Stage 3:** Demolition of remainder of the existing hospital building and Riverglen Unit (Stage 3.1) and construction of the southern seniors living building (Stage 3.2);
- **Stage 4:** Construction of the northern seniors living building; and
- **Stage 5:** Construction of the respite care building.

### 4.0 Planning context

#### 4.1 Strategic planning documentation

The following strategic planning documents are relevant to the proposal:

- NSW State Priorities;
- Greater Sydney Region Plan;
- North District Plan;
- Better Placed – An Integrated Design Policy for the Built Environment of NSW;
- Lane Cove Local Strategic Planning Statement;
- Guide to Traffic Generating Development; and
- Future Transport 2056.

## 4.2 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) establishes the assessment framework for SSD. Under Section 4.5, the Minister of Planning is the relevant consent authority for SSD. Section 4.12(8) requires that Development Applications for SSD must be accompanied by an Environmental Impact Statement (EIS) that meets the requirements as set out in Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation).

## 4.3 State Environmental Planning Policy (State and Regional Development) 2011

The SRD SEPP identifies development which is declared to be State Significant. Clause 8(b) of the SEPP identifies that development is SSD for the purposes of the EP&A Act if it is specified in Schedule 1 or 2 of the SEPP. Clause 14 'Hospitals, medical centres and health research facilities' of Schedule 1 of the SEPP specifies the following developments to be SSD:

*Development that has a capital investment value of more than \$30 million for any of the following purposes—*

- (a) hospitals,*
- (b) medical centres,*
- (c) health, medical or related research facilities (which may also be associated with the facilities or research activities of a NSW local health district board, a University or an independent medical research institute).*

Therefore, the proposal is SSD as its hospital component has a capital investment value in excess of \$30 million.

Although seniors living is not listed under Schedule 1 of SEPP SRD, Clause 8(2)(a) of the SEPP provides 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'. The proposed development, which incorporates the hospital and seniors living uses, is for a single, integrated development with significant physical and functional links between the uses. The seniors living uses are intended for older residents (75+ years of age) with chronic health care needs and cannot function independently of the hospital. This issue will be further discussed in the EIS.

## 4.4 State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004

*State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004* (SEPP Seniors) permits seniors living development on land zoned special uses 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 to be 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. The application will demonstrate how the proposal is consistent with the relevant design standards.

## 4.5 Lane Cove Local Environmental Plan 2009

The *Lane Cove Local Environmental Plan 2009* (LLEP 2009) also applies to the site, establishing the primary land use and built form parameters. The key controls that apply to the site under the LLEP 2009 have been summarised in **Table 1** below.

**Table 1 Key applicable LLEP 2009 controls**

Clause	Control	Commentary
2.1 – Land use zones	SP2 Infrastructure (Health Service Facilities)	The redevelopment of the Greenwich Hospital continues to be permissible with consent under the SP2 Infrastructure (Health Service Facilities) zoning of the site. It is noted that the seniors living component is permissible in accordance with SEPP Seniors (refer to <b>Section 4.4</b> above).

Clause	Control	Commentary
4.3 – Height of buildings	N / A	No applicable building height limit applies to the site. The height of the proposed development is consistent with height limits imposed by the Concept Approval.
4.4 – Floor space ratio	N / A	No maximum FSR limit applies to the site. The proposed development is consistent with the maximum GFA limits as imposed by the Concept Approval.
5.10 – Heritage conservation	I118 – Pallister	Pallister House, a heritage item of State significance, is located on the site (specifically, the eastern portion of the site under Lot 4 of DP584287). The item is listed as I118 under Schedule 5 of the LLEP 2009. The EIS will demonstrate that the proposed development does not adversely impact the sensitive heritage fabric of Pallister House.

It is noted that Development Control Plans (DCPs) do not apply to SSD's. The built form parameters for the redevelopment of the site have been established through the Concept Approval, which this application will demonstrate consistency with.

#### 4.6 Other planning policies

There are a range of other Environmental Planning Instruments and policies that will need to be considered as part of the EIS, including:

- *State Environmental Planning Policy (Infrastructure) 2007;*
- *State Environmental Planning Policy No. 55 – Remediation of Land;*
- *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development;*
- *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004;*
- *State Environmental Planning Policy No. 19 – Bushland in Urban Areas;*
- *Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 (Deemed SEPP);*
- *State Environmental Planning Policy No. 65 – Design Quality of Residential Apartment Development;*
- *State Environmental Planning Policy (Coastal Management) 2018;* and
- *Biodiversity Conservation Act 2016.*

## 5.0 Overview of likely environmental impacts

Based on a preliminary environmental assessment, the following are the key environmental assessment and planning issues that will need to be considered as part of the future detailed design SSDA.

### 5.1 Consistency with strategic and statutory plans

The EIS will outline how the proposed development is consistent with the strategic planning framework and context of the site as analysed in **Section 4**. As noted above, the proposed development is permissible with consent, and consistent with the key planning controls of the Lane Cove LEP 2009 and SEPP Seniors. The application will also demonstrate consistency with the Concept Approval (SSD 8699).

### 5.2 Urban design and built form

The EIS will demonstrate how the proposed development is consistent with the building envelopes and built form parameters of the Concept Approval and how the development successfully integrates with the site's unique heritage and landscape character. The application will also respond to the specific design related conditions and matters for further assessment set out in the Concept Approval.

### 5.3 Landscaping

The EIS will be accompanied by Landscape Plans outlining how the detailed landscape design will complement the built form and heritage context of the site. In particular, how the landscape design will enhance the interface between the development and Pallister House and how the proposal will enhance the landscape setting of the development on River Road. It will also confirm any vegetation that will be removed or retained and consider relevant bushfire standards.

### 5.4 Amenity

The SSDA will include an assessment of amenity impacts of the proposed development and demonstrate, including with regards to solar access, visual privacy, view impacts, and light spillage, as consistent with the Concept Approval. SEPP 65 and the ADG will be referenced to inform the assessment of the seniors living component.

### 5.5 Heritage impacts

The SSDA will include a Heritage Impact Statement (HIS) that provides a statement of significance and an assessment of the proposed development's impact on the heritage item on the site (the State-heritage listed Pallister House), as consistent with the Concept DA Approval.

The document will comprise a schedule of conservation works for Pallister House, a Heritage Interpretation Plan detailing how the history and significance of Pallister House is to be presented to the public, the archaeological significance of the site (including both Aboriginal and non-Aboriginal archaeological impacts), and an Aboriginal Heritage Management Plan (AHMP) as required under the Concept Approval.

### 5.6 Ecologically Sustainable Development

The SSDA will assess the incorporation of Ecologically Sustainable Development (ESD) principles into the design of the proposed development, and the construction and ongoing operation of the new buildings. The SSDA will be accompanied by a BASIX assessment, and will address how the development will be designed to consider and reflect national best practice sustainable building principles to improve environmental performance and reduce ecological impact. This will include consideration of Green Star Performance and where certification cannot be achieved, specific details on where compliance cannot be achieved will be included.

## 5.7 Noise and vibration

The SSDA will assess the acoustic impact of the proposed development during both its construction and operational phases, including main noise and vibration sources and measures to minimise and mitigate noise impacts to surrounding sensitive receivers, as consistent with the terms of the Concept Approval.

## 5.8 Accessibility

The SSDA will include a Disability Access Review to demonstrate an appropriate degree of accessibility in accordance with *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004* and the *Disability (Access to Premises - Buildings) Standards 2010* (the Premises Standards).

## 5.9 Traffic, access, and parking

The SSDA will be accompanied by a road safety evaluation, and a Traffic Impact Assessment (TIA) that considers the traffic and transport impacts associated with the construction and operation of the proposed development. The TIA will assess whether the proposed development will result in any adverse traffic, access, or parking impacts as consistent with the requirements of the Concept Approval. Sydney Coordinated Adaptive Traffic System (SCATS) extrapolated data will be utilised to ensure an accurate assessment given the potential impacts of traffic associated with Covid-19.

## 5.10 Biodiversity impacts

The SSDA will demonstrate that the development is consistent with the Biodiversity Development Assessment Report (BDAR), prepared by Eco Logical Australia, dated 23 September 2019, as required under the Concept Approval.

## 5.11 Bushfire impacts

The SSDA will demonstrate that the proposed development does not result in any adverse bushfire safety impacts, and that it complies with the relevant provisions of *Planning for Bush Fire Protection 2019*. A Bushfire Statement will accompany the EIS.

## 5.12 Contamination

The SSDA will include a Remediation Action Plan (RAP) that details any remediation works required for the development, including additional sampling around the potential areas of concern identified as part of the preliminary site investigations carried out as part of the Concept Plan.

## 5.13 Stormwater and flooding

The SSDA will be accompanied by a Stormwater Management Plan (SWP) detailing an assessment of any flood risk on site and consideration of any relevant provisions of the *NSW Floodplain Development Manual 2005*, stormwater and drainage infrastructure, and details demonstrating that water sensitive urban design measures have been incorporated into the development.

The application will also include stormwater plans detailing the proposed methods of drainage without impacting on downstream properties and bushland (Gore Creek Reserve) to the southwest.

## 5.14 Utilities

The SSDA is to be accompanied by a Utilities Statement that addresses existing capacity and any augmentation requirements of the development with regards to the provision of utilities.

## 5.15 Waste

The SSDA will include Waste Management Plan(s) (WMP) to address storage, collection, vermin-control, hygiene and management of waste and recycling within the development.

### 5.16 Construction impacts

The EIS will include a preliminary Construction Management Plan which will address the construction impacts of:

- Noise and vibration;
- Traffic movements;
- Sedimentation and erosion;
- Water and air quality impacts; and
- Waste management.

## 6.0 Engagement

An extensive programme of communication and engagement with relevant stakeholders has occurred throughout the design and development of the Greenwich Hospital redevelopment project. Of note, HammondCare has:

- Provided regular updates and responded to queries from the community;
- Undertaken dedicated engagement, including site visits, with government agencies, key community groups, neighbours and stakeholders;
- Created a new project page on HammondCare's website and responded to enquiries received through the website portal;
- Letterbox dropped community updated and notifications to more than 1,830 residents; and
- Held a community drop-in event where information regarding the proposed key amendments to the Concept Plan was made available.

This programme of consultation and engagement with the community will continue as the development progresses through the detailed design stage. In preparing the EIS, it is expected that additional consultation will also be undertaken with:

- Lane Cove Council staff and Councillors;
- Transport for NSW;
- Environment, Energy and Science Group;
- Heritage NSW; and
- Rural Fire Services.

The SSDA process will also provide further opportunities for community input and for the proponent to respond to any issues raised. HammondCare is committed to continuing dialogue with the relevant stakeholders and agencies throughout the development assessment process.

## 7.0 Conclusion

This submission provides the relevant information to assist in the preparation of the Secretary's Environmental Assessment Requirements (SEARs) for the proposed redevelopment of land located at 97-115 River Rd, Greenwich (Greenwich Hospital). The proponent's intention is to redevelop the existing hospital in accordance with the Concept Approval for new health care, allied health facilities, and serviced seniors living uses.

We trust that the information provided is sufficient to enable the Secretary to issue SEARs for the preparation of the EIS. Should you have any queries about this matter, please do not hesitate to contact us as per the contact details provided below.

Yours sincerely,



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