

Our ref: Greenwich Hospital Redevelopment - Detailed Design-Mod-2 (SSD-13619238-Mod-2)

Lauren Marler
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ST LEONARDS, NSW 2065

Attn: Yousheng Li (yli@ethosurban.com)

16 March 2026

Greenwich Hospital Redevelopment – Modification Application (SSD-13619238-Mod-2)

Request for further information

Dear Ms Marler

I refer to your Modification Report dated 6 February 2026, and accompanying Appendices submitted as part of a modification application (Mod-2) to the Planning Secretary under SSD-13619238. Your Modification Report was referred to Transport for NSW (TfNSW), Lane Cove Council (Council), and Government Architect NSW (GANSW) for comments.

After careful consideration of the submitted documentation and agency advice, the Department is requesting that you provide additional information on the matters raised below. We also request a response to the issues raised by Council in their submission. GANSW's comments have been incorporated into the below request for further information.

Revised Project staging

- Provide the revised expected duration for each stage of construction including demolition, excavation, and any other significant construction work stages for the proposed concurrent construction of Stage 2 and Stage 3.
- Given that all the existing Hospital services will be taken off-site for the duration of concurrent Stage 2 and Stage 3 construction works, please confirm whether Hospital services will continue to operate to their existing capacity during the entire construction period of the Project.

- Provide a justification for completing and occupying the Seniors Living Buildings (Q3 2028) one quarter prior to the occupation of Health Building (Q4 2028). In your response, also consider:
 - o whether the Project would meet the requirements of the State Environmental Planning Policy (Housing) 2021 (Housing SEPP) as listed under Section 93 'Location and access to facilities and services – independent living units', while the Health Building is under construction including those proposed to be made available on site within the hospital wing. Please confirm whether the 'Pedestrian Entrances' document drafted by Bickerton Masters and submitted at the Project EIS Stage remains unchanged, and revise, if required; and
 - o condition F2 of SSD-13619238 requires that all self-care seniors housing to be provided with home delivered meals, personal care and home nursing, and assistance with housework. Please explain how this condition will be met if the Seniors Living Buildings were to be constructed and occupied one quarter prior to the Health Building.
- Consider and address how the Project would continue to meet the requirements relating to Seniors Living Buildings as outlined under condition B4 of SSD-8699.

Traffic, access and parking arrangements

- Provide a Traffic Impact Assessment (TIA) that considers the proposed vehicle movements during the concurrent Stage 2 and Stage 3 construction including the following information:
 - o proposed vehicle routes with indicative split between heavy vehicles using River Road, and St Vincent Road;
 - o confirmation whether the proposed heavy vehicles have taken into consideration all material, plant and equipment deliveries, and waste trucks for the two concurrent stages;
 - o analysis of the existing transport network, including existing performance levels of nearby intersections utilising appropriate traffic modelling methods (such as SIDRA network modelling);
 - o revised site access arrangements and how they would change and/or be managed, including any driveway restrictions on St Vincents Road, as well as how site access arrangements would change during the three (3) months that the Seniors Living Buildings would be operational and the Health Building under construction;
 - o revised vehicle and pedestrian traffic controls that would be applied to the roads and surrounding sensitive receivers including the school; and
 - o revised on-site car parking and commute arrangements for contractors / construction workers during the concurrent construction works.

- Once the TIA has been completed, please confirm that the Construction Traffic and Parking Management Sub-Plan would be revised in consultation with Council as per conditions C13 and C15 of SSD-13619238.

Noise and vibration

- Provide a revised Noise and Vibration Impact Assessment, assessing the impacts associated with the proposed combined Stage 2 and Stage 3 construction works including concurrent excavation and demolition.
- Outline whether any additional management and mitigation measures would need to be implemented on-site to mitigate the predicted highly intrusive noise levels at the nearest affected sensitive receivers.

Air quality controls

- Outline any additional management and mitigation measures that will be implemented to prevent or minimise dust and odour impacts to the surrounding neighbourhood.

Proposed Seniors Living Buildings façade and balcony planter box changes

- Provide Architectural plans of the revised renders and elevations for all facades of the two (2) Seniors Living Buildings.
- Provide drawings showing before and after comparison of proposed changes to all facades of the two Seniors Living Buildings.
- Given the proposed changes to the facade and balcony planter boxes, please assess any potential changes concerning visual privacy to surrounding neighbouring properties, in particular, residents to the west and south of the Project.
- Provide consideration of the resulting visual and privacy relationship between the occupants within each of the individual apartments, between buildings of the entire Integrated Healthcare Campus, as well as the visual and privacy aspect and relationship to surrounding residential dwellings and onlookers from River Road.
- Confirm whether the Applicant has considered moving forward the timeline for the requirements under condition E12.
- Provide a statement confirming whether the proposed modification still meets the ADG guidelines and requirements assessed in the Architectural Design Verification Statement dated 4 December 2023.

Heritage assessment

- The Heritage Impact Statement (HIS) dated 5 May 2022, prepared at the time of the Project EIS considered how the new buildings will respond to the Heritage significance of Pallister House. The HIS considered the surrounding landscaping, proposed materials and finishes of the facades, and the interface of the Seniors Living Buildings with Pallister House. Consider how the various aspects of the proposed modification, including the proposed landscaping changes and Senior Living Buildings façade changes compare to what was initially proposed and how the changes still address the conditions imposed under SSD-8699.

Landscaping changes

- Outline all landscaping changes circled on the Landscaping drawings provided as part of the modification, and a justification for such changes.
- Provide further details of the exact proposed changes to the boardwalks and any anticipated impacts on vegetation and ecology.
- Outline any changes in areas of Aboriginal significance.
- Please explain the purpose of the boardwalk on the southern boundary of the site, and why is it no longer considered necessary.
- Provide a justification for removing all planters outside of the Health Building, as shown in Figure 8 of the Modification Report.

Community consultation requirements

- The Applicant is required to engage with the surrounding community about Mod-2 including all sensitive receivers around the Project and provide evidence of engagement and consideration of any responses received.

Mitigation measures

- Apart from consideration of impacts requested above, please consider any additional contamination / remediation and waste impacts due to proposed concurrent construction of Stage 2 and Stage 3 works. Outline any management measures that would be implemented to mitigate any potential residual impacts associated with these environmental matters.
- Clarify whether the existing recommendations in the existing Remediation Action Plan (RAP) would still apply because of concurrent Stage 2 and Stage 3 construction, or whether the RAP would need to be updated as part of the proposed modification.

Additionally, the Department raises concerns regarding the proposal being categorised as section 4.55(1A) modification application having regard the additional impact identified to neighbouring

properties in relation to traffic, noise and vibration, dust generation, and potential visual impacts. The Applicant will need to further demonstrate why the modified proposal should not be withdrawn and resubmitted as a Section 4.55(2) modification.

I request you to provide the information, or notification that the information will not be provided, to the Department by Monday, 27 April 2026. If you are unable to provide the requested information within this timeframe, you are required to provide, and commit to, a timeframe detailing the provision of this information.

If you have any questions, please do not hesitate to contact Shiraz Ahmed at tanja.ibsen@dpie.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Lloyd Eley-Smith".

Lloyd Eley-Smith
A/Director, Infrastructure Management
Development Assessment and Sustainability

As nominee of the Planning Secretary