



Mr David Lewis  
Company Secretary  
Level 4, 207B Pacific Highway  
St Leonards NSW 2065

Our ref: SSD 8699

-via email-  
[coast@brs.com.au](mailto:coast@brs.com.au)

Dear Mr Lewis

**Staged Redevelopment of Greenwich Hospital (Concept Proposal) (SSD 8699)  
97 - 115 River Road, Greenwich – Response to Submissions**

As previously advised, the exhibition of the Environmental Impact Statement (EIS) for the Staged Redevelopment of Greenwich Hospital (SSD 8699), ended on Friday, 5 April 2019. All submissions received by the Department of Planning and Environment (the Department) during the exhibition of the project is available on the Department's website at:

[http://majorprojects.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=8699](http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8699)

In accordance with clause 85A of the *Environmental Planning and Assessment Regulation 2000*, the Secretary requires the Applicant to respond to all issues raised in these submissions and Government agency advice, and where necessary, technical supporting documents must be revised.

The Department has now undertaken a preliminary assessment of the application and requires the issues outlined in Attachment A to also be addressed.

Note that under clause 113(7) of the *Environmental Planning and Assessment Regulation 2000*, the days occurring between the date of this letter and the date on which you provide your Response to Submissions to the Department are not included in the deemed refusal period.

If you have any questions, please contact Teresa Gizzi on (02) 8275 1124 or via email at [teresa.gizzi@planning.nsw.gov.au](mailto:teresa.gizzi@planning.nsw.gov.au).

Yours sincerely

David Gibson *17/4/19*  
**Acting Director**  
**Social and Other Infrastructure Assessments**  
as delegate for the Secretary

## ATTACHMENT 1

### 1. Seniors Living

The Department requests clarification around the operation of the serviced self-care housing including how the seniors housing will operate in combination with the hospital and what services will be offered.

### 2. State Environmental Planning Policy (Housing for Seniors of People with a Disability) 2004 (SEPP (HSPD))

#### Clause 26 Location and Access to Facilities

The RtS must demonstrate compliance with the location and access to facilities requirements of SEPP (HSPD). This includes identifying the relevant bus stops for each seniors housing building; demonstrating that a 'suitable access pathway' is available to the bus stops which meets the gradient requirements of SEPP (HSPD); demonstrating that the relevant bus stops are DDA compliant (see comments from TfNSW); and demonstrating that the facilities which must be available to residents are located at a distance of not more than 400m from the destination bus stop.

It is unclear how compliant gradients will be achieved given the topography of the site and slope of River Road.

#### Clause 29 Consent Authority to Consider Certain Site Compatibility Criteria

Clause 29 requires the Department to give consideration to the criteria contained in Clause 25(5)(b)(i)(iii)(v).

Clause 25(5)(b)(i) relates to the natural environment. The Department considers the extent of tree removal proposed to facilitate the development and the requirement for almost the entire site to be maintained as an Inner Protection Area for bush fire protection to be incompatible with the surrounding land uses and character of the area.

Clause 25(5)(b)(v) relates to the impact of the bulk and scale of the development. The Department considers the bulk and scale of the proposed seniors living apartments and on the western side of the site and the proposed hospital to be inconsistent with the generally low density residential character of the area. Further, the height of the proposed buildings would result in a significant visual impact from across the valley to the west.

To satisfy Clause 29, the Department considers the extent of seniors living on the site should be decreased, which would reduce vegetation removal, visual impacts, and provide space for the hospital to be accommodated in a building of reduced height and visual prominence.

#### Clause 30 Site Analysis

A site analysis containing all information required by Clause 30 is to be submitted with the RtS.

#### Clause 33 Neighbourhood Amenity and Streetscape

The Department considers the proposed development to be contrary to Clause 33. The character of the area is defined by low density residential development generally one and two storeys, with only the existing hospital buildings exceeding this height.

The proposed seniors living apartments are considered inconsistent with the desirable elements of the location's current character and would not contribute to the quality and

identify of the area. Further, the proposed development would not complement and sensitively harmonise with the heritage listed Pallister House.

The proposal does not adopt building heights compatible in scale with adjacent development and requires extensive removal of vegetation across the site contrary to this clause.

As mentioned above, the Department recommends the proposal be amended to reduce the extent of seniors living proposed on the site.

#### Clause 38 Accessibility

Due to the topography of the land, further information is required to demonstrate how accessibility across the site would be achieved to provide attractive, and safe environments for residents and visitors.

#### Clause 50 Standards That Cannot Be Used to Refuse Development Consent

The Department acknowledges the concept nature of the proposal; however it is unclear how 70 per cent of dwellings will receive 3 hours of direct sunlight mid-winter due to the siting and location of the proposed buildings and likelihood of the northern apartment building overshadowing the southern building.

The RtS must demonstrate how solar access would be achieved.

### **3. Heritage**

Please refer to the comments provided by Office of Environment and Heritage – Heritage Division. The Department recommends the proposed development be modified as outlined in their comments to reduce the impacts on Pallister House, which would also assist in resolving inconsistencies with the requirements of SEPP (HSPD) above.

### **4. State Environmental Planning Policy 65 (Design Quality of Residential Apartment Development) (SEPP 65)**

It is not considered the proposed development adequately responds to the Design Quality Principles contained in Schedule 1 of SEPP 65. In particular, the built form of the proposed development development is considered inconsistent with Principles 1 and 2.

Further, although the development is for a concept proposal only, the RtS must demonstrate how the development could achieve the relevant requirements of the Apartment Design Guide (e.g. access to sunlight and building separation).

### **5. Architectural Details**

Further detail is required to undertake a comprehensive assessment of the concept proposal. In particular, the architectural plans must include the existing ground levels, the finished ground levels for the main elements of the development, additional sections throughout the site to demonstrate the relationship between the proposed buildings and Pallister House, and setbacks from the boundaries to establish the location of the envelopes.

### **6. Ecologically Sustainable Development (ESD)**

The Department acknowledges the concept nature of the proposal and that detailed ESD reports will be submitted with future project applications. However, it is recommended the concept proposal commit to achieving a minimum standard (e.g. 4 star Green Star rating) across the site with details of the standard will be achieved to be provided with the future development applications.

## **7. Government Architect of NSW (GANSW)**

The GANSW has provided the following comments:

### **“Site Context**

*The requirements of the redevelopment will increase the building stock on the site. The general arrangement: placing the Hospital at the heart of the site accessible via River road is supported. Buildings of nearly equal scale and bulk: the two Seniors Living Apartment (SLA) blocks are located adequately to take advantage of the views. The Seniors Living Villas (SLV) located in the quieter eastern green area is also well located. More information regarding proposed amenity needs to be provided, including walk paths and travel distance times (for an elderly person) to be able to understand how this site will be used. It is recommended a further detailed landscape plan is provided indicating this required information. Demonstrate strategies for high levels of internal amenity including access to natural daylight and ventilation; acoustic separation; and additional spaces for patients and visitors to gather. Provisions for bicycles and vehicles seems adequate, more detail regarding these should follow in subsequent applications.*

### **Built Form**

*The EIS fails to provide adequate information to fully understand the proposed building forms and materiality. Detailed Elevations were not included as part of the EIS. The plans indicate the Hospital and two SLA's will be large building forms. It was not possible to fully attain from the small provided renders the final materiality or form of these buildings. However, from the little information provided, we advise the materiality of the SLA needs articulation and further development. Better connection to the outdoor spaces and reduction of great expanses of wall penetrations is required. Further development of the design quality and built form, with specific consideration of façade, rooftop, massing, setbacks, building articulation, materials and colours, with particular attention to the aged care residences. We recommend elevations, sections and 3D models of all building types be included in the following submission. Attention to the design quality and built form with specific consideration of façade, rooftop, massing, setbacks, building articulation, materials and colours, with attention to the aged care residences needs to be achieved.*

### **Landscape**

*A clear landscape plan indicating which trees will be kept and removed is required to understand the extent of change on the site.*

*The general 'logic' proposed in the landscape proposal is adequate, though in a preliminary stage. Further development of the Landscape Plan to include detail drawings and perspectives should be encouraged for the next submission. Landscaping should try and incorporate indigenous planting and design. The landscape strategy should consider security, topography, shade and be integrated with built form. Integrated public art should be detailed.*

*We recommend that independent design review through the NSW SDRP would offer a robust and consistent process for the achievement of high quality design, appropriate for a project of this scale and significance.”*

Please provide a response to address the outstanding issues raised by GANSW.

## **8. State Environmental Planning Policy 33 – Hazardous and Offensive Development**

The RtS is to consider the applicability of SEPP 33 to the proposal and provide a preliminary risk screening in accordance with State Environmental Planning Policy No.

33 – Hazardous and Offensive Development (SEPP 33) and the Department's Applying SEPP 33 guidelines.

**9. Flooding**

Please refer to the issues raised by OEH. A preliminary flood study is required to determine if the site is affected by flooding or overland flow.

**10. Contamination**

A Preliminary Site Investigation is not sufficient to demonstrate the site is not contaminated and is suitable for the residential use in accordance with State Environmental Planning Policy No 55—Remediation of Land. A Detailed Site Investigation is to be submitted and if remediation is required, a strategy for remediation is to be submitted.

**11. Community Consultation**

As a significant number of public submissions have been received opposing the proposed application, the Department recommends further engagement with the community be undertaken to as part of the RtS to respond to the community concerns raised.