

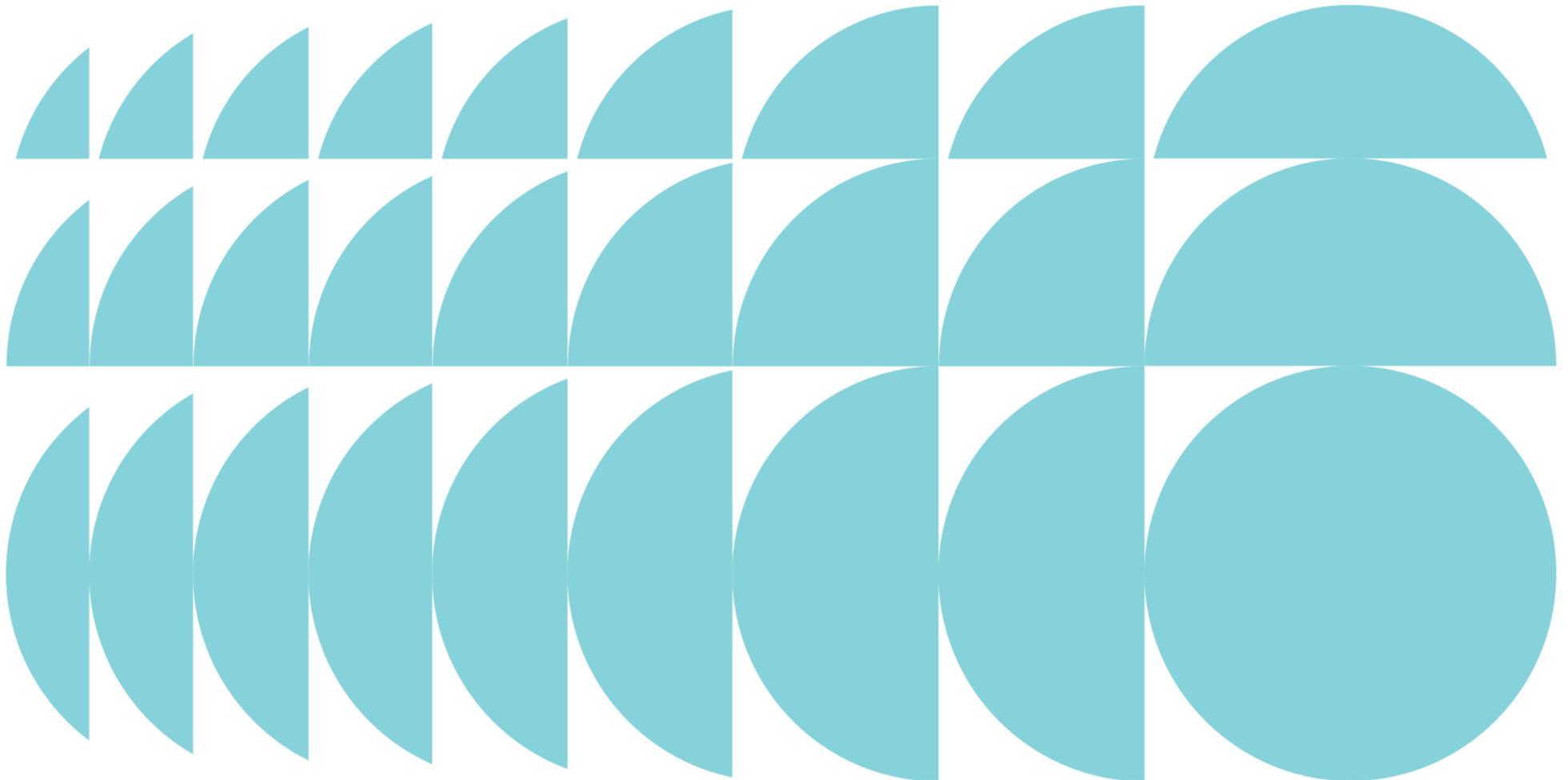
ETHOS URBAN

Response to Agency Submissions

Staged Redevelopment of Greenwich Hospital

Submitted to Department of Planning, Industry and
Environment

24 September 2019 | 2190376



Appendix B

Response to Government and Agency Submissions

The following is a summary response to the submissions provided by State and local government agencies. The proponent's responses have been informed by input by the expert consultant team and should be read in conjunction with the Response to Submissions Report to which this document is appended.

The relevant agencies can be found at the following page references:

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1. Ausgrid	
We note the recommendation by Lane Cove council in Appendix O that the proponent liaise with Ausgrid to determine if a new substation is required for the development. We agree that the proponent should consult with Ausgrid regarding this as early as possible.	Noted. This matter will be addressed at part of the subsequent detailed design application.
Ausgrid has 132,000V underground cables present in River Rd and recommends the proponent obtain the plans through DBYD and refer to Ausgrid Network Standard NS156 regarding working near these cables.	Noted. This matter will be addressed at part of the subsequent detailed design application.
2. Civil Aviation Safety Authority	
At a maximum building height in the order of 80m RL, no Helicopter Landing Site, a long way from any aerodrome and at least 1km from Royal North Shore Helicopter Landing Site, there are no implications for Aviation Safety and CASA has no further comment.	Noted.
3. Environment Protection Authority	
On the basis of the information provided, the proposal does not constitute a Scheduled Activity under Schedule 1 of the Protection of the Environment Operations Act 1997 (POEO Act). The EPA does not consider that the proposal will require an Environment Protection Licence (EPL) under the POEO Act. Accordingly, the EPA has no comments regarding the proposal and has no further interest in this proposal.	Noted.
4. Lane Cove Council	
<p>Zoning</p> <p>The only type of accommodation that could be considered as Health Service Facilities use is accommodation for staff (resident doctors, nurses and health care workers) which is a related use. This accommodation is ordinarily ancillary to the primary use as Health Service Facilities. The Seniors housing (apartments) and Seniors Living Units (villas) are a form of residential accommodation and are not permitted as Health Services Facilities.</p>	It is recognised that seniors living is a type of 'residential accommodation' and does not fall under the land use definition of 'health services facilities'. However, the proposed serviced, independent living units are a type of 'seniors living' which is made permissible at the site by <i>State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004</i> (SEPP Seniors) and is 'serviced' with health services. Refer to Section 2.1 of the RTS Report which demonstrates compliance with the requirements of SEPP Seniors.
<p>Seniors housing (apartments) and Seniors Living Units (villas) are not a permissible use within the zone under Lane Cove Local Environmental Plan 2009.</p> <p>The objectives of the SP2 Health Services Facility zone include:</p> <ul style="list-style-type: none"> To provide for infrastructure and related uses. To prevent development that is not compatible with or that may detract from the provision of infrastructure. <p>Seniors housing is contrary to the zoning objectives of SP2 Infrastructure.</p>	As noted above, seniors living is permissible at the site in accordance with SEPP Seniors. The proposed seniors living comprises serviced independent living units and residential aged care. This is distinguished from typical residential units in that HammondCare retains ownership of the seniors living units which will be used to meet a range of health care needs of the community. The HammondCare model is based on providing a continuum of care through the integration of a wide range of health care services in one location. This allows residents to access a full range of health care support as they age without having to relocate and enables couples that may have different care requirements to continue to live together. Refer to Section 2.1 of the RTS Report for further information on this model.
The proposed Seniors living accommodation is not classified as medical infrastructure or a related use. Seniors living accommodation is not compatible with the intended use as Greenwich Hospital and would compromise the ability of the site to extend the provision of medical infrastructure in the future. Although prohibited in the Lane	As outlined above, HammondCare's continuum of care model seeks to co-locate a range of health care services with seniors living to accommodate the health care needs of the ageing population. The proposed seniors living is a

Issue	Response
<p>Cove LEP, Seniors Living may be permitted under the State Environmental Planning Policy SEPP (Housing for Seniors or People with a Disability) 2004.</p>	<p>permissible use via SEPP Seniors and is an integral part of the wider hospital development as it is reliant upon integrated onsite health services as well as being consistent with the trend towards 'hospital at home' care. The integrated campus model aims to respond to the future trends of health care which include a higher prevalence of chronic disease, prolonged duration of illness and complex co-morbidities.</p> <p>In addition, changes in the way patients are managed and improvement in treatments is expected to improve efficiencies in the health care system. This means that the proposed increase in beds and the provision of serviced seniors living and residential aged care as part of this application may effectively lead to a tripling or quadrupling of patients given care over time.</p> <p>Refer to Section 2.1 of the RTS Report.</p>
<p>Council acknowledges the need for Seniors living facilities. The projected demographics of the area are characterized by an aging population. The 2016 census confirmed that 13.7% of the population within the Lane Cove LGA were aged 65 years and over. The percentage of residents over 65 is only predicted to rise. Despite these demographic trends, only appropriate sites should be utilized for Seniors living accommodation. Seniors living accommodation has been supported at locations where the use is permissible within the zone.</p>	<p>Seniors living is permissible use at the site via SEPP Seniors and the integrated nature of the proposed serviced seniors living development addresses a specific health care need of the community which is not accommodated by typical standalone seniors living developments (such as in-fill self-care housing/retirement villages) or hospitals. Refer to Section 2.1 of the RTS Report</p>
<p>The re-development for Seniors housing (apartments) and Seniors Living Units (villas) would restrict any future expansion of Health Services Facilities which would be required to meet the needs of the community. Therefore, permitting these uses would not be in the public interest as they would compromise the site's primary intended use as a health services facility.</p>	<p>The proposal represents a significant expansion of the current Health Services through the provision of additional access options to receive care. Furthermore, it is considered that there is potential for further development in the future if required (for example, above the 1 and 2 storey building podium).</p> <p>In addition, hospitals have minimum operational and design requirements in order to be viable and without this significant investment by HammondCare and the incorporation of their integrated seniors living model there would be no hospital at the site. Therefore, not providing seniors living at the site would limit the health care options available to the community and deprive them of the specialised health care services offered by HammondCare's innovative continuum of care model. It would also place additional pressure on the public health system.</p> <p>It should be noted that the project capital is fully funded by HammondCare and ownership of the seniors living is retained by Hammondcare. Therefore, issues associated with the potential fragmentation of site ownership through strata subdivision are not applicable to the development and the buildings could be repurposed in the future to meet changing healthcare needs if required. As noted above, efficiencies in the health care system will also likely result in a far greater number of patients receiving care from the same sized facility over time. Refer to Section 2.1 of the RTS Report</p>

Issue	Response
<p>The site area is approximately 33763 sqm, with the proposed Gross Floor Area (GFA) for medical uses is 13,900 sqm, and Seniors Living 14,400 sqm. It is of concern that a site which is primarily designed for medical use would have more residential Gross Floor Area than medical.</p>	<p>The amended proposal includes approximately 13,500m² of health service facility uses, including the respite centre and Pallister house, and 12,800m² of seniors living uses.</p>
<p>Greater Sydney Commission, North District Plan Significant development across the Greater Sydney region over the last two decades has resulted in sustained pressure on the existing tree canopy within urban areas. Council acknowledges that there are significant challenges to increase tree canopy and meet the directives of the North District Plan. These challenges include diminishing areas of space required for adequate tree cover, combined with competition from the built environment. The proposal for Greenwich Hospital does not attempt to increase existing tree canopy or at least retain existing canopy levels. The proposed development would remove more than 50% of total tree canopy and is contrary to the North District Plan. The removal of 131 trees does not comply with the regional directives of the Greater Sydney Commission.</p>	<p>The amended proposal has been designed to maximise the retention of existing significant vegetation and provide new planting to increase the existing tree canopy. Refer to Section 2.2 and 2.6 of the RTS Report for further information.</p>
<p>The eastern part of the site, along St Vincents Rd contains a large number of remnant indigenous trees, with <i>Angophora costata</i> (Sydney Red Gum), <i>Eucalyptus pilularis</i> (Blackbutt) and <i>Eucalyptus resinifera</i> (Red Mahogany) as canopy species as well as a number of understorey tree species. There are numerous sandstone rock outcrops in the vicinity. These trees are species naturally occurring in the area and are either remnants of the original forest cover or regenerating natural vegetation. These trees individually and as a group are considered to be significant trees under Council's DCP Part J. In light of the above, the proposed tree removal is not supported by Council.</p>	<p>The amended proposal significantly reduced the number of trees to be removed as a result of the proposal. It is noted that the removal of the seniors living villas at the south eastern corner of the site as part of the amended scheme significantly enhances the retention of trees and the development as a whole will now result in a net increase to trees at the site. Refer to Section 2.2 and 2.6 of the RTS Report for further information.</p>
<p>Arborist Report / Biodiversity Report There are 235 individual trees located on and adjoining the site. A total of 131 of these have been proposed to be removed to facilitate the proposal, the remaining 104 have been proposed to be retained and protected for the life of the development. The report has not specified which trees of the 104 retained would be subject to minor or major encroachments (expressed as a percentage, low being equal to or less than 10% of the total Tree Protection Zone area). As a result, the level of construction impacts the retained trees would be subject to is unknown, rendering their potential for retention in question.</p>	<p>The amended proposal seeks to maximise the retention of existing trees and revised arborist and biodiversity reports have been prepared based on the amended proposal. Refer to Section 2.6 and 2.7 of the RTS Report for further information.</p>
<p>The Biodiversity Report identifies 0.77 hectares of native vegetation on the St Vincents Rd frontage and describes the open treed character as part of the semi natural historic curtilage around Pallister. This vegetation has been identified as Coastal Enriched Sandstone Dry Forest (DSF 04) and Plant Community Type (PCT) smooth barked apple/ red bloodwood. Of this 0.77 ha, 0.44 ha or more than half, will be removed for the proposed seniors villas. A significant number of those remnant indigenous trees within the eastern part of the site along St Vincents Road are to be removed. In this area, only 2 Red Mahogany trees are to be retained, only 4 Blackbutts and only 8 or 9 Sydney Red Gum trees (as there are inconsistent recommendations for tree 79). Among the trees to be removed, a number of trees identified in this report as high priority trees for retention (trees 64, 77 176, 184).</p>	<p>The senior's villas have been removed from the proposal and replaced with a respite care centre located to the north of the existing St Vincent's Rd driveway. Development is no longer proposed to the south of the driveway. A revised Biodiversity Report has been prepared which demonstrates a reduced impact on vulnerable species. Refer to Section 2.7 of the RTS Report for further information.</p>
<p>It is noted that a number of Blackbutt trees identified to be retained require further investigation including resistograph testing. Depending on the results of these investigations, it is likely that 131 is an underestimation of the number of trees that will be removed.</p>	<p>A revised Tree Survey has been undertaken and Arborist Report prepared for the proposal. These documents clarify the number of trees located at the site and within its immediate surrounds. Refer to Section 2.2 and 2.6 of the RTS Report for further information.</p>
<p>The report does not contain scaled site plans that identify the radius of Tree Protection Zones (TPZ) or Structural Root Zones (SRZ) in relation to the proposed development. Given the volume of trees assessed in this report it is</p>	<p>A revised Arborist Report has been prepared which includes the radius of Tree Protection Zones. Refer to Appendix G.</p>

Issue	Response
<p>considered scaled site plans that overlay tree data (TPZ, SRZ and canopy spread) onto the proposed plans are essential in the accurate assessment of the development. In light of the above, the arboricultural documentation provided is considered insufficient and inadequate.</p>	
<p>Bushland Adjoining Site The site is classified as Land adjacent to Bushland under the State Environmental Planning Policy 19 Bushland in Urban Areas. The southwest corner of the site adjoins a public reserve related to Gore Creek. The proposal is subject to an assessment against Lane Cove DCP Part H Bushland Protection. As per the DCP, the proposal should allow for a minimum 10m setback of all building structures from bushland to ensure the development does not impact on the integrity of the adjoining bushland. The proposal indicates an increase in shadows south west of the site at 9.00am during midwinter. The DCP recommends new buildings and structures to be designed and orientated to ensure reasonable sun access is maintained to adjoining bushland throughout the year.</p>	<p>It is noted that DCPs do not apply to State Significant Development, however a setback of at least 10m is provided to the bushland at the south eastern corner of the site and the development will not cause significant additional shadowing as the shadow of the proposed building envelope falls largely within the existing shadow caused by the site's steep topography and existing built form. Refer to Section 2.2 and 2.6 of the RTS Report for further information.</p>
<p>Heritage Palister House is a two-storey brick, slate roofed Italianate villa constructed in 1892 which is listed on the State Heritage Register as an item of State significance. The nine-storey hospital building is proposed immediately to the north east of Pallister house and is separated by a car park and internal road. The building comprises a podium with basement parking and seven floors above. It is considered that the new hospital building would have a negative impact on the heritage significance of Palister house and its setting.</p>	<p>The amended Concept Plan seeks to enhance the interface of the new development with Pallister House and removes the basement parking from its curtilage and includes additional landscape detail in the curtilage. Refer to Section 2.3 of the RTS for further detail.</p>
<p>The high-rise vertical facade of the southern elevation would dominate the curtilage of Pallister and create overshadowing during the morning period. The building is of an unprecedented scale in the vicinity of the heritage building. The height and massing of the hospital are incompatible with Pallister, exacerbated by its close proximity to the heritage building.</p>	<p>The podium of the hospital has been redesigned to better relate to Pallister House and includes measures included to improve the interface. Refer to Section 2.3 of the RTS for further detail.</p>
<p>The Heritage Impact Statement (HIS) by NBRIS also refers to potential impacts of the Hospital: ... <i>The Hospital building will visually dominate the heritage item as it is a larger building with a closer relationship to Pallister than the existing hospital buildings.</i> The HIS makes no recommendation for the mitigation or management of the substantial impact of the new building and considers this impact to be acceptable.</p>	<p>Consultation with OEH has identified mitigation measures, such as landscaping, which can be implemented to improve the interface with Pallister House. A statement from NBRIS in support of the amended Concept Plan has also been provided. Refer to Section 2.3 of the RTS for further detail.</p>
<p>Earlier heritage assessments (refer NBRIS 2004 Report) noted that "the remnant driveway and carriage loop are critical to maintaining the 'gardenesque' character of the setting". Were the consent authority to issue a development consent, the following condition of consent is recommended: <i>The design of the new hospital building should be amended to reduce impact on Pallister house and its surrounding curtilage. This may be achieved by increasing the distance of the building from the heritage item and stepping back the south west facade at each floor level to reduce the massing and visual dominance of the building.</i></p>	<p>The amended design has enhanced the interface of Pallister House and the hospital through the stepping back of the south west facade. Taylor Brammer has prepared a landscape concept design which celebrates the remnant driveway and gardenesque character of the setting. Accordingly, the Concept Landscape Plan will ensure the detailed design enhances the curtilage of Pallister House and therefore a condition of consent is not considered necessary. Refer to Section 2.3 of the RTS for further detail.</p>
<p>SEPP (Housing for Seniors or People with a Disability) 2004 The Seniors housing (apartments) and Seniors Living Units (villas) components are prohibited under the Lane Cove LEP 2009, but are proposed as permitted under the Seniors Living State Environmental Planning Policy (SEPP). The proposal is considered to be contrary with Clause 33 of the SEPP. The bulk and scale of the apartment buildings are considered incompatible with surrounding development.</p>	<p>Refer to Section 2.2 of the RTS which demonstrates the seniors living buildings are consistent with the relevant provisions of SEPP Seniors.</p>
<p>Clause 33 (c)(iii) of the Policy states: <i>(iii) adopting building heights at the street frontage that are compatible in scale with adjacent development,</i></p>	<p>Refer to Section 2.2 of the RTS which demonstrates the seniors living buildings are consistent with the relevant provisions of SEPP Seniors.</p>

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<p>Land zoned within the vicinity of the proposed development is R2 Low Density Residential with majority one and two storey dwellings houses. North of the site on River Road is Greenwich Public School which is approved for 3 storey buildings on site.</p>	
<p>The proposed Seniors housing (apartments) would be 6-storeys and not in keeping with the scale and the adjacent development. The bulk and massing of Seniors Living apartments would be highly visible from the public way. The existing main hospital building is setback approximately 55m from the River Road frontage. It is set behind a leafy tree lined setting and is not highly visible. The proposed 6 storey Seniors living apartments will be setback only 5m - 1 Om from the River Road frontage. They would visually dominate the northwest corner of the site.</p>	<p>Refer to Section 2.2 of the RTS which demonstrates the seniors living buildings are consistent with the relevant provisions of SEPP Seniors. As outlined at this section, compatibility does not necessarily mean identical in relation to built form. Rather a development is considered compatible if its environmental impacts are acceptable which has been demonstrated the case for the proposal throughout the RTS report.</p>
<p>Clause 45 (6)(a)(ii) states: <i>at least 10% of the dwellings for the accommodation of residents in the proposed development will be affordable places,</i> While Council does not support the imposition of residential development on the hospital site outside that permitted in the SP2 Infrastructure zone, if supported by the Consent Authority, the design should ensure compliance with affordable housing provisions of the SEPP. It is recommended that HammondCare submit further information to allow better understanding of their affordable housing model.</p>	<p>It is noted that Clause 45(6) of SEPP Seniors only requires affordable places if the proposal is seeking bonus FSR through the 'vertical village' provisions of the SEPP. As the application does not rely on Clause 45 of the SEPP, this clause does not apply.</p> <p>Notwithstanding, HammondCare is a registered charity which specialises in providing health care services to the elderly and those that are financially disadvantaged. Of note, across HammondCare's facilities:</p> <ul style="list-style-type: none"> • 45% of aged care recipients are low income or disadvantaged; • 50% of inpatients and outpatients are public patients; and • 15% of seniors living residents benefit from affordable options. <p>Therefore, HammondCare's operations clearly contribute to providing affordable places. Irrespective, it is requested that a specific condition of consent is not imposed in this regard for operational reasons which may preclude the provision of care based on an individual's financial circumstances.</p>
<p>Although a compatibility certificate is not explicitly required to be submitted under Clause 24 (1) (a) (ii) of the SEPP, it is noted that a number of the key considerations in Clause 25 as to whether a proposed development is compatible are relevant in relation to Greenwich Hospital. It is recommended that the provisions and assessment criteria of compatibility of the development with surrounding uses as specified in Clause 25 (5) (b) should be considered by the consent authority when assessing the concept plan.</p> <p>These include: (ii) <i>'the impact that the proposed development is likely to have on the uses that, in the opinion of the relevant panel, are likely to be future uses of the land'</i> As mentioned earlier, concerns are raised by Council that the proposed independent Seniors living component may inhibit and compromise the future use of the site for medical uses. (v) <i>'...the impact that the bulk, scale, built form and character of the proposed development is likely to have on existing uses, approved uses and future uses of the land in the vicinity to the development'</i> Given that there are no height controls on site, the proposed development should be viewed in context to the surrounding built form on and adjoining the site. Concerns are raised that the proposed scale of the Seniors living buildings and hospital will dominate Palister and is not in keeping with the low scale of residential development surrounding the site.</p>	<p>The proposal provides an integrated health campus and will not inhibit or compromise the use of the site for medical uses. The proposal is also consistent with the character of the area and seeks to maximise the retention of vegetation. Refer to Section 2.2 of the RTS for further information.</p>

Issue	Response
<p>(vi) 'if the development may involve the clearing of native vegetation that is subject to the requirements of Section 12 of the Native Vegetation act 2003'</p> <p>Concerns are raised with the large-scale removal of canopy trees and vegetation from the site.</p>	
<p>The site is located within the Sydney Harbour Catchment area and is therefore subject to the provisions of the SREP and the DCP. Clause 3.4 landscape character type 9 of the DCP requires <i>any development within this landscape ... it is sited and designed to maintain the vegetation cover on the upper slopes and ridgelines.</i></p>	<p>The amended scheme maximises the retention of existing trees and increases the overall vegetation of the site. A visual impact analysis of the proposed development has been submitted with the RTS. Refer to Section 2.2 of the RTS for further information.</p>
<p>The application proposes the removal of 131 canopy trees alongside new 6-storey Seniors living apartment buildings and the maximum 9-storey upgraded hospital building. There is no information on the increased visual prominence potentially along the ridgeline when viewed from Northwood Peninsula and Onions Point Woolwich among others. The applicant is recommended to submit a photomontage to demonstrate how visible the proposal would be when viewed from the southern side of the Lane Cove River.</p>	
<p>Engineering The applicant is required to prepare a Stormwater Management plan which would require an Onsite Detention System, include rain water tanks and meet BASIX requirements. An Erosion and Sedimentation control plan would need to be prepared. A Hydrological Survey is to be submitted to address concerns relating to potential loss of natural drainage.</p>	<p>This application is for a Concept Plan only and these matters will be addressed as part of a subsequent detailed design application.</p>
<p>Environmental Health The applicant would need to provide Construction Noise Management Plan (CNMP), an acoustic report to address impact of traffic, a Waste Management Plan and a detailed Stage 2 Contamination Report.</p>	<p>This application is for a Concept Plan only and these matters will be addressed as part of a subsequent detailed design application.</p>
<p>Access While Council does not support the imposition of residential development on the hospital site outside that permitted in the SP2 Infrastructure zone, all apartments and villas are required to be accessible. Access is to be provided to and within all areas normally used by the occupants in accordance with AS1428.1 access to premises standards.</p>	<p>The design of the seniors living buildings will be accessible. This will be demonstrated as part of the subsequent detailed design application and a letter from Abe Consulting confirming the development is capable of achieving compliance has been submitted with the RTS.</p>
<p>Communal space (both internal and external) are required to be accessible for all residents in both the Villas and Apartments. It should be noted that if the roof garden is to be considered communal open space it would need to be accessible to the residents of the Villa and Apartments without having to go through the Hospital or associated buildings. Provisions should be made to provide residents with community facilities including a communal garden and worm farm, community and recreation spaces and a community shed.</p>	<p>The amended scheme no longer proposes seniors villas and the detailed design of the communal open space will be resolved as part of a subsequent DA. A Concept Landscape Plan prepared by Taylor Brammer has been submitted as part of this RTS which will guide the design of future areas of communal open space. Refer to Section 2.6 of the RTS for further information.</p>
<p>Amenity of Seniors living Apartment buildings Although the residential components are not supported by Council, Seniors apartment buildings may be permitted under the Seniors Living State Environmental Planning Policy (SEPP). Should approval be granted by the Consent Authority (Minister for Planning), compliance with the SEPP 65 and the Apartment Design Guide is required. Concerns are raised in relation to the Seniors living buildings meeting the requirements of the Apartment Design Guide. In particular amenity requirements should be complied with to ensure residents receive adequate residential amenity in relation to solar access, cross ventilation and building separation.</p>	<p>The proposed building envelopes have been designed to facilitate compliance with SEPP 65 and the ADG. This will be further addressed as part of a subsequent detailed design application. Refer to Section 2.8 of the RTS for further information.</p>
<p>The submitted shadow diagrams indicate the south and west elevations of both Senior living buildings receiving minimal solar access during mid-winter. 70% of all units should receive a minimum 2 hours of sunlight to living</p>	<p>Solar access diagrams have been prepared to demonstrate that the future detailed design of the seniors living buildings is capable of achieving 70%</p>

Issue	Response
rooms and private outdoor spaces between 9am and 3pm during mid-winter. The submitted shadow diagrams should be checked for accuracy. In particular, the contour lines at 24 Gore Street appear equally spaced on plan and should be reviewed.	solar access to all units. Refer to Section 2.8 of the RTS for further information.
<p>Traffic The applicant has provided a Traffic & Parking Impact Assessment prepared by Baker Ryan Stewart dated October 2018. Council supports the relocation of the majority of at-grade parking to basement level. This would allow increased landscaping in open space areas and increased amenity. Detailed basement carparking plans have not been provided for assessment. All off street parking is to comply with the relevant provisions of the SEPP and Part R of Councils DCP Traffic Transport and Parking.</p>	Noted, a detailed Traffic and Parking Assessment will be provided as part of a subsequent detailed design application.
<p>5. NSW Rural Fire Service</p>	
<p>The NSW Rural Fire Service provides the following advice regarding bush fire protection measures for the proposed development: Asset Protection Zones <i>The intent of measures is to provide sufficient space and maintain reduced fuel loads so as to ensure radiant heat levels of buildings are below critical limits and to prevent direct flame contact with a building:</i> 1. That all land within the subject site, excluding the rainforest vegetation in the southwest corner (see Image 01 p13) and the heritage land associated with Pallister House (being Lot 4 DP 584287), as an Inner Protection Area (IPA) as outlined within section 4.1.3 and Appendix 5 of Planning for Bush Fire Protection 2006 and the NSW Rural Fire Service's document Standards for asset protection zones.</p>	FPA Australia has prepared a letter to clarify that RFS has excluded the rainforest vegetation in the south west corner of the subject site and the heritage lot associated with Pallister House from the requirement to be maintained as an Inner Protection Area which is consistent with the recommendations of the submitted Bushfire Hazard Assessment Report. A copy of this letter is included at (Appendix H).
<p>2. The land within Lot 4 DP 584287, associated with Pallister House, shall be subject to a specific Vegetation Management Plan (VMP) to ensure that it does not pose a bush fire threat to the proposed development and adjoining properties. The Vegetation Management Plan (VMP) shall include, but not be limited to, the following for the ongoing management of the land:</p> <ul style="list-style-type: none"> • Ground fuel shall be managed to low level grasses less than 100 mm in height; • There shall be no surface fuel accumulation (bark leaf and twigs) greater than 4 t/ha; • Shrub gardens shall be restricted to no more than 20% of the area; and, • A 2 metre - 5 metre separation distance shall be provided from any tree limb to a shrub garden. 	Noted, this matter will be further considered at the detailed design phase.
<p>3. A Fuel Management Plan shall be established to ensure the ongoing management of the asset protection zones.</p>	Noted, this matter will be further considered at the detailed design phase.
<p>Design and Construction <i>The intent of the measures is to reduce the risk of ignition of a building from a bush fire while the fire front passes:</i> 4. Construction of the Seniors' Living Apartments shall comply with Sections 3 and 5 (BAL 12.5) Australian Standard AS3959-2009 Construction of buildings in bush fire-prone areas or NASH Standard (1.7.14 updated) National Standard Steel Framed Construction in Bushfire Areas - 2014 as appropriate and section A3.7 Addendum Appendix 3 of Planning for Bush Fire Protection 2006.</p>	Noted, this matter will be further considered at the detailed design phase.
<p>Internal Roads <i>The intent of measures for internal roads is to provide safe operational access for emergency services personnel in suppressing a bush fire, while residents are accessing or egressing an area. To achieve this, the following conditions shall apply:</i></p>	Noted, this matter will be further considered at the detailed design phase.

Issue	Response
5. Internal roads shall comply with section 4.2.7 of <i>Planning for Bush Fire Protection 2006</i> .	
<p>Water, Electricity and Gas <i>The intent of measures is to provide adequate services of water for the protection of buildings during and after the passage of a bush fire, and to locate gas and electricity so as not to contribute to the risk of fire to a building.</i></p> <p>6. Water, electricity and shall comply with Section 4.2. 7 and Section 4.1. 3 of <i>Planning for Bush Fire Protection 2006</i>.</p>	Noted, this matter will be further considered at the detailed design phase.
<p>Evacuation and Emergency Planning <i>The intent of the measures is to provide suitable emergency and evacuation (and relocation) arrangements for occupants of special fire protection purpose developments:</i></p> <p>7. A Bush Fire Emergency Management and Evacuation Plan shall be prepared consistent with <i>Development Planning- A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan December 2014 and Australian Standard AS3745 2010 Planning for Emergencies in Facilities</i>.</p>	Noted, this matter will be further considered at the detailed design phase.
6. OEH – Aboriginal Cultural Heritage	
<p>Archaeological potential of the study area No Aboriginal objects have been recorded in the study area, however, the potential for objects to be present has been noted, particularly in the eastern portion of the project area. The potential for archaeological deposit in rock overhangs that were not able to be accessed during the survey has specifically been recorded. The visibility at the time of the survey was also noted to be low. OEH supports the CHC recommendations to complete additional survey of the project area if access to areas of rock overhangs is improved. An AHMP could guide this process.</p>	<p>It is proposed to undertake further Aboriginal cultural heritage assessment, including subsurface archaeological testing along the eastern side of the site, prior to any ground disturbing impacts. Advice from Cultural Heritage Connections (Appendix M) recommends that these investigations be undertaken once the full design and extent of the development is known (i.e. at the subsequent detailed design stage of the development) to avoid unnecessarily impacting areas of the site which will not be developed. Accordingly, HammondCare is willing to accept a condition of consent on the Concept Plan requiring these investigations prior to any ground disturbance in the nominated area.</p>
<p>Archaeological testing is recommended prior to any ground disturbing impacts OEH advises that further assessment, including subsurface archaeological testing, should be completed in the area of archaeological potential along the eastern side of the project area at an early stage of the project and prior to any ground disturbing impacts.</p>	
<p>An AHMP should be developed OEH does not support the current unexpected finds procedure provided in the ACHAR. Instead, a comprehensive AHMP should be developed, in consultation with the registered Aboriginal parties, (RAPs) to guide management and mitigation measures. The unexpected finds procedure in the ACHAR also recommends completing excavation if in situ deposit are identified during works. OEH recommends that testing of any areas of identified deposit should be completed prior to salvage excavation to inform of the nature and significance of the deposit.</p>	
<p>Suggested edits to the consultation sections of the ACHAR The ACHAR states that 17 RAPs registered an interest in the project, however only 15 groups have been listed in the ACHAR. It also appears the Deerubbin Local Aboriginal Land Council (LALC) was advised of the RAPs for the project, rather than Metropolitan LALC which is the relevant LALC for this site (refer to pg. 21 of the ACHAR). These matters should be clarified.</p>	Heritage Connect has reviewed this matter and confirm there was 15 groups as detailed in the RAPs. The ACHAR has been updated to clarify this matter (Appendix T).
<p>A submission from Corroboree Aboriginal Corporation, included in Appendix 2 of the ACHAR, indicates that they would prefer if their submission and their details are not passed on to OEH or the LALC. The submission should be redacted in future versions of the report. This group is also not listed as a RAP in the ACHAR. It should be clarified if all required consultation documentation was provided to this group.</p>	Heritage Connect has reviewed this matter and confirm that MLALC were consulted about this project and not Deerubbin LALC. The ACHAR has been updated to clarify this matter (Appendix T).

Issue	Response
7. OEH – Heritage Division	
<p>It is noted that no works are proposed to Pallister, which ensures significant built fabric would be retained. This approach is supported; however, it is unclear what condition Pallister is in and a schedule of conservation works should be prepared to ensure that the fabric and condition of the historic building is assessed and works to support ongoing conservation are identified and implemented as part of this proposal;</p>	<p>No works are proposed to Pallister House as part of the Concept Plan application.</p>
<p>Views to Pallister from the River Road and St Vincent’s Road are largely screened by existing development and mature vegetation along the boundaries of the site. Nonetheless, the concept proposal is an opportunity to make Pallister a focal point of the proposal with adequate setbacks and recognition of views to allow better appreciation of this historic villa. This is particularly important along St Vincents Road as this area is within the curtilage of the item. Whilst it is acknowledged that these views of Pallister from the St Vincents Road entry are somewhat limited, the proposed seniors living villas which would flank this access and view line, would dramatically alter the approach to the heritage item.</p>	<p>The amended proposal opens up a new view to Pallister House from River Road and enhances the approach to Palliser House from St Vincents Road. Refer to Section 2.3 of the RTS for further information.</p>
<p>Whilst it is also recognised that the development – aided by the sloping topography – would be generally lower than Pallister, these seniors living villas would still significantly alter the appreciation of the villa in its landscaped setting. The concept proposal should be altered to relocate the seniors living villas further towards the River Road in the north-eastern section of the State listed curtilage and be no further south than the access road. This design modification would leave the connection to St Vincents Road, and the landscaped setting of Pallister, intact in this area;</p>	<p>The seniors living villas have been deleted from the amended proposal and replaced with a single respite care centre to the north of the access road. Refer to Section 2.3 of the RTS for further information.</p>
<p>The retention of significant mature trees in the immediate vicinity of Pallister is appropriate and would in a small way help mitigate some of the adverse impacts of the large-scale hospital development on the adjacent lot. While historic access paths, a carriage loop and a better landscaped setting for Pallister have been identified in the SOHI, detail is not yet available and is stated to be the subject of a future application. Research into the historic landscape to inform landscape conservation works and a sympathetic landscaped setting for Pallister would assist in the mitigation of the adverse impacts of the subject concept plan;</p>	<p>The amended proposal includes a Concept Landscape Plan which enhances the heritage setting of Pallister House through reinstating a gardenesque setting and reinterpreting historic paths, the carriage loop and other significant features. Refer to Section 2.3 and 2.6 of the RTS for further information.</p>
<p>The removal of a large amount of mature vegetation which contributes to the setting of Pallister would adversely impact the significance of the heritage item. By removing the southern seniors living villas, many trees within the curtilage could be retained, positively impacting the future setting of Pallister;</p>	<p>The amended proposal increases the retention of trees across the site and compensatory planting will result in a net increase in trees. Refer to Sections 2.2 and 2.6 of the RTS.</p>
<p>Despite addressing of the two-storey height of the historic villa with a podium, the scale of the proposed hospital building would dominate Pallister. It is recognised that this is outside the State listed curtilage, however the important views of Pallister from within the site open when travelling along the St Vincents Road access and these would be dramatically altered by the massive height difference between the old and new. Further efforts to mitigate these impacts should be considered including a reduction in height, increased setbacks away from Pallister’s north and north-west boundary, and moving the bulk further away from Pallister (towards River Road); this modification would also reduce the overshadowing of Pallister by the proposed hospital structure;</p>	<p>The revised scheme features a number 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. Refer to Section 2.3 of the RTS for further information.</p>
<p>The seniors living apartments proposed to the west of Pallister should be moved further away from Pallister to create a generous setting where a landscaped buffer zone can help reduce the negative visual impacts of the proposal on views to Pallister;</p>	<p>The southern seniors living building envelope has been moved further away from Pallister house and reconfigured to improve its relationship with the heritage item. Refer to Section 2.3 of the RTS for further information.</p>

Issue	Response
<p>It is understood further resolution of the form, detailing and materiality of the development is yet to be undertaken. Whilst contemporary development which does not mimic the historic villa is accepted practice, a holistic approach which considers the significance of the site is important to mitigate negative impacts. An appropriately experienced heritage consultant should be nominated for the project and be part of the detailed design to ensure these heritage issues are considered and sympathetically addressed;</p>	<p>Noted, an experienced heritage consultant will be involved in the detailed design of both the buildings and landscaping. This will be addressed as part of a future application for detailed design.</p>
<p>The proposed basement car parking would encroach into the curtilage of Pallister. This could have an adverse impact on the structural integrity of the historic villa. To mitigate these impacts, the basement car parking should be moved outside the curtilage;</p>	<p>The basement parking has been removed from the curtilage of Pallister House and a structural engineering statement has been provided to confirm the proposal will not affect the structural integrity of Pallister House. Refer to Section 2.3 of the RTS for further information.</p>
<p>Historical Archaeology: The GML Historical Assessment has identified there is potential for locally significant archaeological resources to remain in parts of the site (GML, 2018: Figure 5.1, p35). These areas are focused on 'Pallister' in the south of the site and in the connection to River Road along the eastern part of the site within the SHR curtilage. However, the assessment has not clearly explained how the identified archaeological resources would satisfy local levels for the post 19th century and late 19th century features identified in Table 5.2 (GML 2018: p35-36). To confirm that significance and appropriate management responses, the Division supports the approach to undertake earlier physical investigation of the areas of archaeological potential where works involving ground disturbance, as modified by the above Heritage Division comments are adjusted, to inform the final design of the redevelopment. This should also inform the interpretation of Pallister as an item of State heritage significance, which is also recommended above. This approach is supported as the remains in these areas may not retain archaeological research potential, but former remains of e.g. earlier structures such as the observatory, are significant for other values within the SHR site. Interpretation of these elements as a result of earlier archaeological investigative techniques for the site within the broader redevelopment is supported.</p>	<p>Physical investigation of archaeological potential in the southern area of the site will be undertaken prior to works involving ground disturbance. HammondCare is willing to accept a condition of consent on the Concept Plan requiring these investigations prior to any ground disturbance in the nominated area. Refer to Section 2.5 of the RTS report for further information.</p>
<p>Should approval be considered, the following conditions are recommended:</p> <ul style="list-style-type: none"> Nominated Heritage Consultant - A suitably qualified and experienced heritage consultant must be nominated for this project. The nominated heritage consultant must provide input into the detailed design (including on the form, detailing and materiality of the proposal), provide heritage information to be imparted to all tradespeople during site inductions, and oversee the works to minimise impacts to heritage values. The nominated heritage consultant must be involved in the selection of appropriate tradespersons, and must be satisfied that all work has been carried out in accordance with the conditions of this consent. 	<p>HammondCare is willing to accept a condition of consent in relation to this item.</p>
<ul style="list-style-type: none"> Specialist Tradespersons - All work to, or affecting, significant fabric shall be carried out by suitably qualified tradespersons with practical experience in conservation and restoration of similar heritage structures, materials and construction methods 	<p>HammondCare is willing to accept a condition of consent in relation to this item.</p>
<ul style="list-style-type: none"> Site Protection - Significant built and landscape elements are to be protected during site preparation and the works from potential damage. Protection systems must ensure significant fabric, including landscape elements, is not damaged or removed. 	<p>HammondCare is willing to accept a condition of consent in relation to this item.</p>
<ul style="list-style-type: none"> Schedule of Conservation Works - A schedule of conservation works is to be prepared by a suitably qualified and experienced heritage consultant nominated for the project. The schedule is to specifically address urgent, medium and long-term conservation works which support the conservation of the building. The approved schedule is to be implemented as part of redevelopment of Greenwich Hospital. 	<p>A Conservation Management Plan currently exists for the site and has informed recent restoration and repairs.</p>

Issue	Response
<ul style="list-style-type: none"> • Modified Concept Proposal: <ul style="list-style-type: none"> - The concept proposal is to be modified to remove the seniors living villas proposed to the south of the St Vincents Road access drive. Any seniors living villas within the curtilage are to be to the north of this access drive only. This modification would help retain the connection between Pallister and St Vincents Road, the landscaped setting of the historic villa, and reduce the visual impacts on the State significant heritage item. 	<p>This item has already been addressed as part of the modified proposal and therefore a condition of consent is not necessary.</p>
<ul style="list-style-type: none"> - The concept proposal should be modified to reduce the adverse heritage impacts on Pallister through consideration of: a reduction in height of the hospital building and the western seniors living apartments; increased setbacks of these structures away from Pallister’s north and north-west boundary; and transfer of the bulk of these buildings further away from Pallister (towards River Road). The increased setback is important to create a generous setting where a landscaped buffer zone can help screen the development and reduce negative visual impacts on views to Pallister. 	<p>This item has already been addressed as part of the modified proposal and therefore a condition of consent is not necessary.</p>
<ul style="list-style-type: none"> - The proposed basement car parking is to be modified to be wholly outside the curtilage of Pallister to mitigate any potential adverse impacts on the structural integrity of the historic villa. 	<p>This item has already been addressed as part of the modified proposal and therefore a condition of consent is not necessary.</p>
<ul style="list-style-type: none"> • Landscape Plan - A sympathetic landscape plan is to be developed by an appropriately qualified and experienced landscape architect with expertise in historic gardens and landscapes. The plan is to be informed by research into the historic landscape of Pallister, including pathways, fencing and vegetation. Further detail is to be provided on how the proposed formal parking and landscaped setting of the area surrounding Pallister is to be detailed to respect - and where possible reintroduce - the historical landscaped setting and character of Pallister. All efforts should be made to screen the hospital and other buildings from Pallister. The landscape plan must be supported by a heritage impact assessment detailing how the proposed landscaped setting of Pallister respects the significant values of the place and mitigates negative impacts. 	<p>Noted, a Concept Landscape Plan has been prepared for the RTS which will be refined as part of the subsequent detailed design application.</p>
<ul style="list-style-type: none"> • Interpretation - An interpretation plan must be prepared in accordance with the NSW Heritage Division publication Interpreting Heritage Places and Items Guidelines, and the approved plan implemented prior to the issue of an occupation certificate. The interpretation plan must detail how information on the history and significance of Pallister will be provided for the public, and make recommendations regarding signage and lighting. The plan must identify the types, locations, materials, colours, dimensions, fixings and text of interpretive devices that would be installed as part of this project. The plan should also incorporate the results of any archaeological investigative program undertaken for the Pallister site. 	<p>HammondCare is willing to accept a condition of consent in relation to this item.</p>
<ul style="list-style-type: none"> • Historical Archaeology: The proposed approach to conduct early archaeological testing to understand the archaeological research potential, management in terms of amended design recommendations (as identified in this letter), and to inform the interpretation of Pallister is supported. To assist this the following requirements are recommended (as standard conditions to manage the archaeological activity): 	
<ul style="list-style-type: none"> - An Excavation Director must be nominated to manage the historical archaeological excavation program. This nominated person must demonstrate they are able to meet the Heritage Council of NSW’s Excavation Director Criteria for locally significant sites. 	<p>HammondCare is willing to accept a condition of consent in relation to this item.</p>

Issue	Response
<ul style="list-style-type: none"> - An archaeological excavation methodology and research design, to establish the approach of the archaeological excavation, must be written prior to the start of any excavation works and be prepared for approval by the Heritage Council of NSW or its delegate. 	<p>HammondCare is willing to accept a condition of consent in relation to this item.</p>
<ul style="list-style-type: none"> - The applicant and Excavation Director must ensure the results of the archaeological program are written up in a final excavation report outlining opportunities for conservation in situ (as a preference) according to significance, development & interpretation. This final archaeological report must be submitted to the Heritage Council of NSW and the local Council library within 12 months of the completion of the archaeological excavation. The proponent shall be required to nominate a repository for the relics salvaged from any historical archaeological excavations including details of their ongoing management and conservation. 	<p>HammondCare is willing to accept a condition of consent in relation to this item.</p>
<p>8. Office of Environment and Heritage</p>	
<p>Biodiversity <u>Species credit species</u> The assessment undertaken for identifying habitat suitability for threatened species is considered inadequate by OEH. The following step under section 6.4 of the BAM needs to be applied in its entirety: Step 3 Identify candidate species credit species for further assessment. This must include the reasons for determining why a predicted species credit species is unlikely to have suitable habitat on the subject land or specific vegetation zones (see section 6.4.1.19 of the BAM). Depending on the outcome, the subsequent steps of section 6.4 may also need to be applied.</p>	<p>A new BDAR Report has been undertaken by Ecological Australia in accordance with the Biodiversity Assessment Method 2017 (BAM) established under Section 6.7 of the NSW Biodiversity Conservation Act 2016. Refer to Section 2.7 and Appendix O of the RTS report.</p>
<p>Landscaping The EIS notes 5 key landscaping zones are proposed for the development (Zones A, B, C, D and E). It notes it is proposed to plant locally occurring indigenous species in Zone A on the eastern side of the site with species from the Coastal Enriched Sandstone Dry Forest (pages 23, 24 and 69). Within Zone C, the EIS indicates it is proposed to establish a plant community generally consistent with the Coastal Sandstone Gallery Rainforest and with the Coastal Sandstone Foreshores Forest (pages 23, 24 and 69). For Zone B, the EIS notes 'new plantings will use species sympathetic to the era of the building' (ie Pallister House) and for Zone E it proposes to use plants which 'emphasise seasonal change and colour' (page 69). Section 10. 7 of the EIS however notes it has been recommended that the species included in any landscape plans be informed by locally native species (page 86) and Section 8 of the BOAR indicates the Landscape Plan will aim to reinstate native vegetation associated with PCT 1776 across the site (page 39).</p>	<p>A Concept Landscape Plan has been prepared for the proposal. Locations for native plant species will be carefully selected across the site to simulate native vegetation communities combined with cultural planting that reinforces the heritage values of place. The inner landscape curtilage of Pallister will reflect cultural landscape planting that reinforces the heritage values of the late 19th century. This matter will be further addressed as part of the subsequent detailed design application.</p>
<p>OEH recommends the landscaping for all five landscaping zones at the site uses a diversity of native trees, shrubs and groundcover species from the relevant local native vegetation communities (local provenance material) that occur or once occurred in this location to improve biodiversity rather than use exotic species and non-local native species.</p>	<p>Noted. Locations for native plant species will be carefully selected across the site to simulate native vegetation communities combined with cultural planting that reinforces the heritage values of place.</p>

Issue	Response
<p>The AIA indicates tree cover will be enhanced by planting advanced specimens and it notes the 131 trees which are nominated for removal will be replaced in greater numbers than the trees removed (page 46). It is unclear how many replacement trees are proposed to be planted and the RTS should address this. In terms of mitigating the urban heat island effect, improving biodiversity, habitat etc at the site OEH recommends:</p> <ul style="list-style-type: none"> • advanced size local native trees are planted to replace the existing trees to be removed, as the benefits that the existing trees provide can take decades for a juvenile tree to replace • the trees that have been approved for removal are replaced at a ratio greater than 1: 1 • the RTS provides details on the pot container size of the replacement trees, the number of trees to be planted and the plant species. 	<p>The Concept Landscape plan identifies the potential for up to 166 new trees to be planted as part of the redevelopment (including those located on the terraces). These trees are located across the site and represent an integrated design strategy. This matter will be further addressed as part of the subsequent detailed design application.</p>
<p>The Greater Sydney Region Plan - A Metropolis of Three Cities includes an objective (30) that urban tree canopy cover is increased and The North District Plan includes Planning Priority N 19 (increasing urban tree canopy cover and delivering Green Grid connections). The Plans note that the NSW Government has set a target to increase tree canopy cover across Greater Sydney to 40 per cent. Greenwich Hospital is encouraged to increase the urban tree canopy cover. Enough area needs to be provided for on the site to allow the planted trees to grow to full maturity.</p>	<p>The amended Concept Plan has resulted in a significant increase to the number of trees being retained, with 211 existing trees to now be protected, including 48 additional trees as a result of the amended scheme. In addition, a minimum of 60 new trees will be planted, resulting in a net increase of at least 5 trees at the site. This is consistent with Planning Priority N19 of the North District Plan which aims to increase urban tree canopy cover. Overall the landscaped area of the site will increase by 8% (to 20,000m² or approximately 60% of the site area) compared to the original proposal and the deep soil zone will increase by 15% to 13,800m².</p>
<p>Asset Protection Zone The EIS recommends all grounds within the subject site excluding the rainforest vegetation in the south west corner and the heritage land associated with Pallister House will be managed as an Inner Protection Area (IPA) (section 10.12, page 92). If the development is approved it is important that a condition of consent is included which ensures that the rainforest vegetation in the southwest corner of the site which adjoins Gore Hill Reserve is not managed as an IPA.</p>	<p>HammondCare is willing to accept a condition of consent in relation to this item.</p>
<p>Building Design OEH recommends where possible that the proposed development incorporates a Green Roof or Cool Roof into the building design.</p>	<p>A Green Roof is not proposed for the development, however the detailed the Concept Landscape Plans includes a series of landscaped terraces, incorporating significant vegetation, open turfed areas and sensory gardens. These elements will be further detailed at the subsequent detailed design application,</p>
<p>Aboriginal Cultural Heritage Please note that OEH has decided not to provide comments on Aboriginal cultural heritage matters at this time. This does not represent OEH support for the proposal and this matter may still need to be considered by the consent authority.</p>	<p>Noted.</p>
<p>Flood Hospitals are classified critical uses and facilities that need to remain operational during an emergency, while senior living is classified vulnerable development as occupiers would have difficulties to self-evacuate in a major flood event. OEH understand that, there is no overland flow flood study available to provide information about flooding within Lane Cove LGA. Therefore, it is prudent to undertake a preliminary assessment to investigate whether the vicinity of the project is impacted by overland flow for the full range of events up to the probable maximum flood (PMF).</p>	<p>A Preliminary Flood Study has been prepared by Wood & Grieve Engineers (Appendix S). The study identifies that the site is located at a high point in the area and as such overland flow from upstream catchments will continue to be conveyed around the site as per the existing case. Accordingly, the study confirms flood mitigation measures will not be required for the development.</p>

Issue	Response
9. Roads and Maritime Services	
<p>Roads and Maritime has reviewed the submitted documents and notes no modification is proposed to the existing vehicle accesses on River Road. The proponent should be advised any modification to the access driveways or traffic signals on River Road require concurrence and consent from Roads and Maritime under Section 138 and 87 of the Roads Act 1993. Roads and Maritime raises no objection to the application and provides the following comments for your consideration in the determination of the application:</p>	Noted.
<p>1. It is noted the eastern access on River Road is proposed to be restricted to left in/left out access arrangement. Council is to ensure this arrangement is implemented in accordance with the relevant standards.</p>	Noted.
<p>2. All buildings and structures, together with any improvements integral to the future use of the site are to be wholly within the freehold property (unlimited in height or depth), along the River Road boundary.</p>	Noted, this will be confirmed at the detailed design phase.
<p>3. All vehicles are to enter and exit the site in a forward direction. Provision for vehicles to turn around must be provided within the property boundary.</p>	Noted, this will be confirmed at the detailed design phase.
<p>4. All works/regulatory signposting associated with the proposed development are to be at no cost to Roads and Maritime.</p>	Noted.
10. Sydney Water	
<p>Water Servicing</p> <ul style="list-style-type: none"> A watermain extension along River Road from Greenwich Road to the north boundary of the site will be required to service this development. The proposed development site is under the Chatswood Water Supply Zone. 	Noted, this will be considered at the detailed design phase.
<p>Wastewater Servicing</p> <ul style="list-style-type: none"> The properties in Lot 3, DP 584287 will drain to existing 225mm sewers traversing the west side of this lot. The 225mm traversing sewer will need to be relocated if any building's footprint is on them. The properties in Lot 4, DP 584287 will drain to existing 225mm sewers encroaching the south boundary of this lot. The proposed development site is under the Greenwich Sewer Catchment Asset Management Plan (SCAMP) – more specifically, the North Head Sewerage System. 	Noted, this will be considered at the detailed design phase.
11. Transport for NSW	
<p>Accessibility to bus stops</p> <p>The proposal seeks to add senior living units (apartments and villas) to the subject site. For any seniors living on the eastern end of the site, there is currently a lack of accessible pathways and kerb ramps. Furthermore, the bus stop on River Road at St Vincent's Road (TSN 2065124) is not DDA compliant. There is also lack of crossing facilities for residents to access buses from the bus stop (TSN 2065125).</p> <p>It is requested that the applicant should conduct a review of compliance for bus stops that are within accessible distance to the subject site and ensure that the residents of the proposed development have safe access to the bus stops on River Road. The review should identify measures to improve the accessibility to/from the bus stops and the safety for pedestrian crossing River Road in accessing the bus stops, particularly near St Vincent's Road.</p>	Refer to Section 2.2.2 of the RTS report. The proposal meets the requirements of SEPP Seniors in relation to access to public transport without relying on the St Vincents Road bus stop.

Issue	Response
<p>The concept proposal should include improvement measures as identified by the review, which should be in consultation with and approval of the local council.</p>	
<p>Active Transport The Traffic and Parking Assessment acknowledges there is currently a cycleway network available in the vicinity of the subject site and cycling would be a mode of transport for staff living within the general area or catching a train from the nearby train station. However, it is not evident that the concept proposal has included any provision for bicycle parking and end of trip facilities on site. It is requested that the concept proposal should include bicycle parking and end of trip facilities for staff and visitors in accordance with relevant standards and guidelines.</p>	<p>This matter will be further considered at the detailed design phase.</p>