

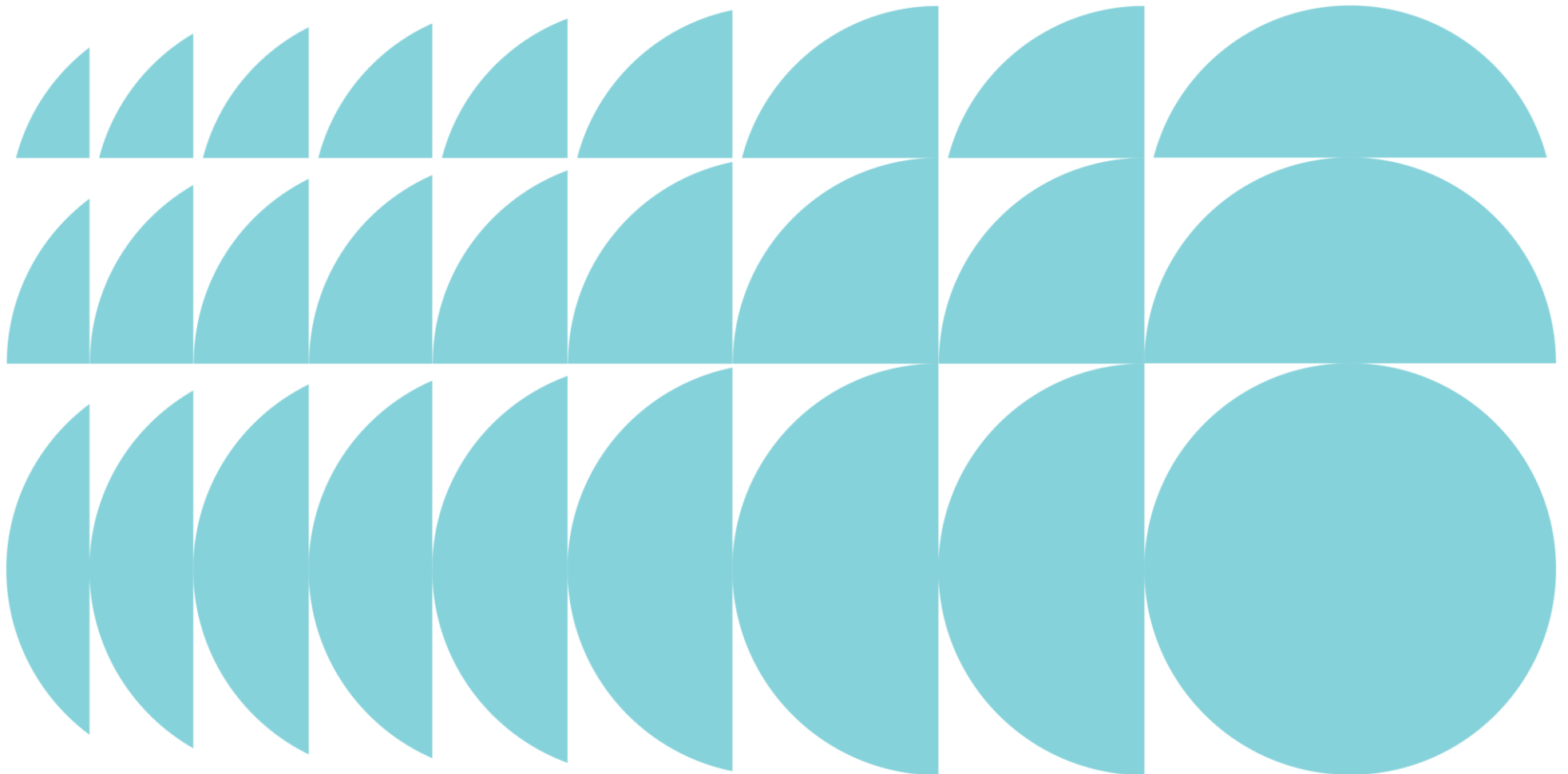
# ETHOS URBAN

## Response to Public Individual Submissions

Redevelopment of Greenwich Hospital

Submitted to Department of Planning, Industry and  
Environment

27 September 2019 | 2190376



## Appendix B

### Response to Public Individual Submissions

The following is a response to all one hundred and seventy six (176) submissions made by the general public. Points raised have been categorised into 23 different issues, alongside a summary of points raised for each issue and the amount of times the issue was raised. 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.

## General Public Submissions

Summary of Issue	Response	No. of times raised
<b>Bulk and Scale</b>		
Bulk and scale of the Hospital building is unsympathetic/out of place with the surrounding residential urban context	<p>Refer to <b>Section 2.2</b> of the RTS report. Amendments to the hospital building have been made, including reconfiguration of its southern side to improve sightlines to, and to increase separation from and strengthen the relationship with Pallister House. The revised design is shown in detail in the Amended Architectural Plans provided by Bickerton Masters at <b>Appendix A</b>.</p> <p>Furthermore, it should be noted that there are minimum GFA and design requirements in order to ensure the viability of the Hospital. Significantly reducing the height/scale of the scheme would result in an inefficient low-rise development which has a high site coverage and requires removal of far more trees. Rather, the large size of the site provides the opportunity to concentrate the bulk of the buildings in the middle of the site where it has the least amount of impact. This issue is further addressed at <b>Section 2.2</b> of the RTS report.</p>	55
Bulk and scale of the Seniors Living uses are unsympathetic/out of place to the surrounding residential urban context	<p>Refer to <b>Section 2.2</b> of the RTS report. The overall bulk and scale of the seniors living buildings have been reduced in the revised scheme, from a GFA of 14,400m<sup>2</sup> as originally proposed to 13,000m<sup>2</sup> as modified. This has involved the removal of all Seniors Living Villas from the scheme and its replacement with a new Respite Care Facility, to better integrate with the primary Health Services use of the site.</p> <p>Furthermore, design changes have been made to reduce the visual impact of the seniors living buildings. The building envelopes, including the top floor levels, have been reconfigured and reduced to soften its appearance and reduce visual bulk. The southern building now steps down to provide a smaller backdrop to Pallister House, whilst the northern building envelope has been reduced at its western end to step down to the neighbouring lower scale residential buildings. The revised design is shown in detail in the Amended Architectural Plans provided by Bickerton Masters at <b>Appendix A</b>.</p>	66
Loss of visual amenity and/or will dominate the skyline of the area	The revised design incorporates changes aimed at minimising loss of visual amenity and reducing the impact of the proposal on the skyline of the area. The revised design is shown in detail in the Amended Architectural Plans provided by Bickerton Masters at <b>Appendix A</b> and A Visual Impact Assessment has been conducted by Clouston Associates and is available at <b>Appendix I</b> , concluding that the overall visual impact of the proposal is acceptable. This issue is further addressed at <b>Section 2.2</b> of the RTS report.	58
Loss of visual amenity from Bob Campbell Oval	As shown within the Visual Impact Assessment at <b>Appendix I</b> and <b>Section 2.2</b> of the RTS Report, the proposal will only have a moderate visual impact when viewed from Bob Campbell Oval and the scale of change is categorised as negligible.	15
Loss of visual amenity from Northwood	The proposed design changes will minimise the loss of visual amenity from Northwood, including through a reduction in the size and scale of the proposed seniors living buildings to better integrate with surrounding built forms to the west of the site, and increasing the setbacks to the western boundary by approximately 5m and stepping down the façade of the building at this interface to reduce the perceived bulk from the public domain and immediate neighbours. This issue is further addressed at <b>Section 2.2</b> of the RTS report.	21
Overdevelopment of the site	The revised design reduces the scope and scale of the proposed redevelopment and incorporates design changes to better integrate the built form with its surroundings. This involves a reduction in seniors living uses from 14,400m <sup>2</sup> as originally proposed to 13,000m <sup>2</sup> as modified, and the removal of the Villas to be replaced by a Respite	27

Summary of Issue	Response	No. of times raised
	<p>Care Facility. The amended development retains a significant portion of the site (approximately 60%) as landscaped area.</p> <p>In addition, there are minimum GFA and design requirements in order to ensure the viability of the operation. Reducing the height/scale of the scheme would result in an inefficient low-rise development which has a high site coverage and requires removal of far more trees. The large site provides an opportunity for masterplanning and to concentrate the bulk of the buildings in the middle of the site where it has the least amount of impact. This issue is further addressed at <b>Section 2.2</b> of the RTS report.</p>	
Proposed development exploits lack of height limit	There is no applicable height limit under the SP2 Infrastructure zoning of the site. This is often the case for special infrastructure zones, including that of health facilities, to account for functionality being a key consideration of design. As mentioned above, the height of the hospital building is a necessary to ensure promote efficient circulation (amongst other benefits) given life safety considerations. This issue is further addressed at <b>Section 2.2</b> of the RTS report.	12
Development height inconsistent with surrounding R2 zoning	Although it is acknowledged that the proposed development contains building envelopes larger than other buildings within its immediate surrounds, this does not mean that the development is incompatible with its surrounds. The site has been carefully master planned to concentrate mass in the middle of the site to minimise impacts and provide a transition in built form to surrounding development. This issue is further addressed at <b>Section 2.2</b> of the RTS report.	35
Height of proposed development is inappropriate considering proximity to bushland	The proposed height of the development will not result in adverse environmental impacts or damage to the adjacent bushland. Rather, it will minimise impacts by concentrating mass away from areas of vegetation. A Bushfire Assessment Report has been prepared by Bushfire Code and Bushfire Hazard Solutions and is attached to the RTS at <b>Appendix G</b> . Further bushfire and fire management arrangements, including a Vegetation Management Plan, will be submitted as part of a subsequent detailed design application.	2
The proposed bulk and scale represents an inappropriate increase compared to the current existing built form	The Greenwich Health Campus Vision attached to the RTS at <b>Appendix C</b> outlines the objectives of the proposed development and the necessity of an intensification of land uses at the site. By 2031, the number of people aged 65 or older in northern Sydney is expected to increase to 18% of the population and the need for specialist dementia care is estimated to double in NSW by 2051. The overarching objective of the development is to enable this demographic to continue to live well and maintain independence as they age. This issue is further addressed at <b>Section 2.2</b> of the RTS report.	12
<b>Construction</b>		
Construction noise / noise pollution	The proposed development is for a Concept Plan only and construction impacts will be mitigated in accordance with a Construction Management Plan to be submitted as part of a subsequent detailed design application.	42
Vibration impacts		
Dust and air pollution		
Hours of construction are excessive		
Construction vehicles and trucks will exacerbate traffic on River Road		

Summary of Issue	Response	No. of times raised
<b>Environment</b>		
Tree and bushland removal (general)	The amended proposal has been designed to maximise the retention of existing significant vegetation and provide new planting to increase the existing tree canopy. In particular, a revised Arborist Report has been prepared by Redgum Horticultural and is available at <b>Appendix F</b> , confirming that under the revised scheme, tree retention and planting on the site is to exceed tree removal. This issue is further addressed at <b>Section 2.7</b> of the RTS report.	104
Impact on flora and fauna / biodiversity impacts	As above, the revised scheme aims to maximise vegetative retention and will also include the planting of 60 new trees, thereby improving the tree canopy cover overall. This includes retaining all vegetation to the southwestern corner of the site (where no significant works are proposed) adjacent to the Gore Creek Bushland Reserve, to minimise impacts on flora and fauna as a result of the proposed redevelopment of the site. This issue is further addressed at <b>Section 2.7</b> of the RTS report.	42
Environmental damage to Gore Creek Bushland Reserve	As above, the revised scheme aims to maximise vegetative retention and will also include the planting of 60 new trees, thereby improving the tree canopy cover overall. This includes retaining all vegetation to the southwestern corner of the site (where no significant works are proposed) adjacent to the Gore Creek Bushland Reserve, to minimise environmental impacts on the reserve.	10
Lack of consideration to surface and sub-surface water flow	An Overland Flow Assessment has been prepared by WGE and is attached to the RTS at <b>Appendix Q</b> , confirming that the proposed development does not obstruct any overland flow paths and will have no impact on overland and stormwater flow, and no further mitigation measures are considered to be required.	4
Arborist's report is inconsistent/inadequate	A revised Arborist Report has been prepared by Redgum Horticultural and is available at <b>Appendix F</b> , with previous discrepancies addressed.	2
Environmental damage to Bob Campbell Oval	Bob Campbell Oval is not included in the construction site for the proposed works and therefore will not receive environmental damage as a result of the proposed development.	3
Failure to meet SSD objectives Section 14 of Schedule 1 of State and Regional Development SEPP	Under Schedule 1 of the State and Regional Development SEPP, hospitals with a CIV of over \$30 million are considered SSD for the purposes of the EP&A Act. The proposed hospital component exceeds this threshold, with a CIV of approximately \$72,465,000, and is considered SSD in its own right. Seniors living is not listed under Schedule 1 of SEPP SRD, however Clause 8(2)(a) of the SEPP states 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'. It is demonstrated in the RTS report that the proposed Seniors living facilities are sufficiently interrelated, being serviced and dependent upon the health services use, to be considered as part of the same SSD. This issue is further addressed at <b>Section 2.1</b> of the RTS report.	1
Loss of vegetation buffer to surrounding residential properties	The revised scheme aims to minimise vegetation loss, including with regards to the vegetation buffer between the site and surrounding residential properties. As the Amended Architectural Plans provided by Bickerton Masters at <b>Appendix A</b> demonstrates, generally all development maintains existing setbacks to boundaries (with the exception of the respite care facility and some works along River Road) which allows all trees between the existing access road and residential properties along Gore Street to the south of the site to be kept. Furthermore, existing vegetation between the proposed seniors living facilities and residential properties to the west of the site will predominantly be kept, to provide suitable screening to those properties.	6

Summary of Issue	Response	No. of times raised
<b>Fire Hazard</b>		
Site is next to Gore Creek Reserve which is a bushfire hazard	A Bushfire Assessment Report has been prepared by Bushfire Code and Bushfire Hazard Solutions and is attached to the RTS at <b>Appendix G</b> . Further bushfire and fire management arrangements, including a Vegetation Management Plan, will be submitted as part of a subsequent detailed design application.	8
Bushfire design / fire management arrangements are unclear	A Bushfire Assessment Report has been prepared by Bushfire Code and Bushfire Hazard Solutions and is attached to the RTS at <b>Appendix G</b> . Further bushfire and fire management arrangements, including a Vegetation Management Plan, will be submitted as part of a subsequent detailed design application.	5
Development should incorporate emergency vehicle access to Gore Creek Reserve and a hazard reduction programme	Further bushfire and fire management arrangements, including the incorporation of emergency vehicle access to Gore Creek Reserve and a hazard reduction programme, will be submitted as part of a subsequent detailed design application.	1
<b>Heritage – Aboriginal</b>		
Lack of Aboriginal heritage investigation and consultation with Aboriginal community	The proposed development is for a Concept Plan only with further investigation of Aboriginal heritage and consultation with the Aboriginal community to be undertaken as part of a subsequent detailed design application. Advice from Cultural Heritage Connections, attached at <b>Appendix L</b> to the RTS, recommends that investigations be undertaken once the full design and extent of the development is known to avoid unnecessary impacts on areas of the site which will not be developed. This issue is further addressed at <b>Section 2.4</b> of the RTS report.	1
<b>Heritage – European</b>		
The development will result in adverse impacts to Pallister House (general)	<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.</p> <p>Structuring Engineering Advice prepared by WGE and attached to be RTS at <b>Appendix K</b> confirm that the proposed basement, which under the revised scheme is no longer to be located within the curtilage of Pallister House, will not structurally affect or damage the building. This issue is further addressed at <b>Section 2.5</b> of the RTS report.</p>	30
Hospital building will overshadow / dominate Pallister House	As above, the revised scheme involves significant alterations to the built form of the hospital building to minimise visual impacts on Pallister House.	16
Seniors Living buildings will detract from Pallister House	The southern seniors living villa has been removed from the proposal and the northern villa has been replaced with a new Respite Care Facility. These modifications exceed the recommendations made by OEH in relation to the villas and allow for the retention of exiting views to Pallister House from the main approach to the building. The southern seniors living building now steps down to provide a smaller and simpler backdrop to Pallister House to ensure there is minimal visual pollution and adequate space provided for interpretation of the heritage item. This issue is further addressed at <b>Section 2.5</b> of the RTS report.	9
Proposed carpark will detract from Pallister House	The carpark within the curtilage of Pallister House proposed in the original application has been removed in the revised scheme.	1

Summary of Issue	Response	No. of times raised
Removal of historic sandstone walls around Pallister House inappropriate	No sandstone walls within the curtilage of Pallister House are to be removed as part of the proposed development.	4
Land and gardens of Pallister House will be damaged / destroyed	The revised scheme lessens the impacts of the proposed redevelopment on the adjacent land and gardens surrounding Pallister House. The removal of the portion of hospital basement carpark within the curtilage will allow for gentler grading and facilitate additional planting and landscaping surrounding the heritage item, more analogous with its original setting. Furthermore, with the removal of the southern seniors living villa, vegetation located south of the existing driveway from St Vincent's Road in Lot 4 is to be kept. This issue is further addressed at <b>Section 2.6</b> of the RTS report.	7
Inadequate protection / encroachment upon Lot 4 as a whole, not just Pallister House	No development is proposed on Lot 4 under the revised scheme except for the Respite Care Facility which is located a significant distance away from Pallister House, to the north of the existing driveway. Previous structures to be within or partially within the Lot have been removed, including the section of Hospital basement carpark to be located within the curtilage in addition to the southern seniors living villa south of the driveway. These design amendments go above and beyond the recommendations of OEH in their submission.	14
<b>Impact on Greenwich Public School</b>		
Increased vehicle/pedestrian traffic will compromise health and safety of students	A Traffic and Parking Impact Assessment was submitted with the original application which concludes the proposed development is not expected to result in significant adverse impacts on the surrounding public road network that will require mitigation. It is noted that improvements to the pedestrian pathway and the eastern vehicular entry will improve sightlines and safety to pedestrians.  Further traffic forecasting and assessment will be provided as part of a subsequent detailed design application, which will also include a Construction Management Plan that will include provisions to minimise construction impacts on the ongoing operation of Greenwich Public School.	46
Children may be endangered by construction works	The proposed development is for a Concept Plan only. A subsequent detailed design application will include a Construction Management Plan that will include provisions to minimise construction impacts on the ongoing operation of Greenwich Public School and mitigate any safety issues that may arise.	14
Proposed development will exacerbate lack of parking for parents accessing the school	A Traffic and Parking Impact Assessment was submitted with the original application which concludes the proposed parking levels are sufficient for the proposed development and all parking for visitors will be accommodated on-site. Therefore, there will be no parking 'overflow' for visitors accessing the proposed development that will compete with parents seeking to access the school.	8
<b>In Support of Proposal</b>		
Supports the proposal	No response required.	7
<b>Infrastructure</b>		
Lack of infrastructure upgrades to support the proposed development (general)	The proposed development is for a Concept Plan only and details with regards to site servicing and infrastructure will be submitted as part of a subsequent detailed design application. It is noted that the application relates to a current health service facility and therefore all necessary services are currently available to the site.	7
Lack of upgrade to sewer infrastructure, which may not cope with extra demand		2

Summary of Issue	Response	No. of times raised
Lack of upgrade to water infrastructure, which may not cope with extra demand		1
Lack of upgrader to power infrastructure, which may not cope with extra demand		1
Insufficient public transport	The proposed development is considered to have sufficient public transport connections with regards to the proposed uses. Specifically, SEPP Seniors requires, under 'Site-related requirements', that seniors living developments in Greater Sydney have access to a public transport service which runs at least once between 8am and 12pm per day and at least once between 12pm and 6pm each day from Monday to Friday and allows residents to access retail, commercial, and community services. The site is served by the 261 and 265 bus services which both at least hourly during weekday daylight hours and connect to the Chatswood, Lane Cove, North Sydney and CBD service centres, and therefore significantly exceed the public transport requirements of SEPP Seniors. This issue is further addressed at <b>Section 2.2</b> of the RTS report.	14
Stormwater impacts of the proposed development on bushland below	An Overland Flow Assessment has been prepared by WGE and is attached to the RTS at <b>Appendix Q</b> , confirming that the proposed development does not obstruct any overland flow paths and will have no impact on overland and stormwater flow, and no further mitigation measures are considered to be required.	7
Infrastructure cannot cope with cumulative impact of all developments in area	A Traffic and Parking Impact Assessment was submitted with the original application which concludes the proposed development will not result in adverse impacts on the surrounding public road network.	13
Insufficient footpath access	This issue, including with regards to site circulation and pedestrian pathways, is further addressed in the Concept Landscape Plan prepared by Taylor Brammer at <b>Appendix N</b> , and <b>Section 2.6</b> of the RTS report. An Access report is also provided which confirms the proposal is capable of complying with all relevant standards ( <b>Appendix E</b> ).	3
Lost opportunity for more extensive ESD and building services	HammondCare is committed to promoting environmental sustainability and has recently prepared their first Sustainability Strategy, which will be followed for the design and operation of the proposed redevelopment. This issue is further addressed at <b>Section 2.10</b> of the RTS report.	1
<b>Loss of privacy</b>		
Seniors Living buildings will allow for lines of sight into backyards and bedrooms	The proposed seniors living buildings contain generous setbacks and exceed building separation requirements prescribed under Section 3F – Visual Privacy of the Apartment Design Guide (ADG), as confirmed by the ADG Compliance Table prepared by Bickerton Masters and attached to the RTS at <b>Appendix P</b> . The minimum 20.8m setback from a side or rear boundary under the proposed scheme is significantly greater than the minimum 12m setback required by the ADG. Any issues relating to privacy will be explored further during a subsequent detailed design application.	32
Light pollution on surrounding residents	The proposed development is for a Concept Plan only and light pollution mitigation measures, if required, will be addressed in a subsequent detailed design application.	9
<b>Noise</b>		
Proposed developments will generate noise pollution (general)	An Acoustic Assessment was prepared by Acoustic Logic and submitted in <b>Appendix Q</b> of the original application, noting that the operation of the proposed redevelopment complies or is capable of compliance with the relevant noise guidelines, subject to further acoustic assessment during the subsequent detailed design stage when the site	11



Summary of Issue	Response	No. of times raised
	design is finalised, and the implementation of the acoustic treatments and recommendations given within the document.	
Increase in traffic will generate noise pollution	Section 6.2.2 of the Acoustic Assessment prepared by Acoustic Logic and submitted in Appendix Q of the original application assessed the acoustic impacts of likely noise generated by additional traffic on public roads. Overall, it was found that the additional noise generated is not significant and complies with the EPA Road Noise Policy.	4
Hospital operations will generate noise pollution, including at night	The proposed development is for a Concept Plan only and therefore a detailed acoustic review of hospital operations is not currently possible as plant selections and locations are not finalised. Nevertheless, Section 6.2.3 of the Acoustic Assessment prepared by Acoustic Logic and submitted in Appendix Q of the original application assessed the likely acoustic impacts of noise generated by hospital operations, including typically noisy plant items including cooling towers, fan coil units and fans, chillers, and the emergency backup power diesel generator.  Overall, it is considered that these plant items, after the implementation of the necessary acoustic recommendations provided in the report (to be confirmed in a subsequent detailed design application), comply or are capable of compliance with all EPA amenity noise limits.	4
Proposed tall building structures will escalate noise reflection and noise amplification	The Acoustic Assessment was prepared by Acoustic Logic concludes that the operation of the proposed development complies or is capable of compliance with the relevant noise guidelines, subject to further acoustic assessment during the subsequent detailed design stage when the site design is finalised, and the implementation of the acoustic treatments and recommendations given within the document.	1
Gore Creek Reserve echoes and amplifies sound – will worsen noise pollution		2
Servicing and delivery trucks will generate noise pollution	Section 6.2.1 of the Acoustic Assessment prepared by Acoustic Logic and submitted in Appendix Q of the original application concludes that the noise expected to be generated by vehicles manoeuvring within the site (including servicing and delivery trucks) complies with the EPA Noise Policy for Industry, with measurements taken at 117/117A/117B River Road (the most sensitive nearby residential receivers).	2
<b>Overshadowing</b>		
The development will result in excessive overshadowing	Shadow diagrams have been supplied as part of the Amended Architectural Plans prepared by Bickerton Masters at <b>Appendix A</b> of the RTS, demonstrating that only minimal overshadowing will be generated by the proposed redevelopment outside of the site.	12
Overshadowing onto Bob Campbell Oval	Shadow diagrams have been supplied as part of the Amended Architectural Plans prepared by Bickerton Masters at <b>Appendix A</b> of the RTS, demonstrating that no overshadowing will occur onto Bob Campbell Oval.	11
Overshadowing onto Gore Creek Bushland Reserve	Shadow diagrams have been supplied as part of the Amended Architectural Plans prepared by Bickerton Masters at <b>Appendix A</b> of the RTS, demonstrating that no overshadowing will occur onto Gore Creek Bushland Reserve.	7
<b>Traffic and Parking</b>		
Insufficient parking has been proposed	A Traffic and Parking Impact Assessment was submitted with the original application which concludes the proposed provision of parking is appropriate. Parking for the seniors living component complies fully with the rates stipulated in SEPP Seniors, with one space per unit plus additional visitor spaces; 163 parking spaces are proposed for the hospital to service the 150 beds/rooms. Public transport options are also available for the site, meaning a proportion of visitors will not elect to drive.	15

Summary of Issue	Response	No. of times raised
Design of basement carparking entrance inappropriate	The proposed development is for a Concept Plan only and the design of the basement carparking entrance will be further detailed as part of a subsequent detailed design application.	1
Existing parking already insufficient in the area / overflow from hospital due to lack of parking capacity	A Traffic and Parking Impact Assessment was submitted with the original application which concludes the proposed provision of parking is sufficient for the development and all parking for visitors will be accommodated on-site. Therefore, there will be no adverse impacts on on-street parking.	14
Insufficient parking for staff and service cars proposed	As per the Traffic and Parking Impact Assessment submitted with the original application, a total of 329 parking spaces are proposed across all the site's proposed uses. Parking needs of staff and service cars have been factored into this number, with 1 space per registered medical practitioner and 1 space per every 2 employees. Parking spaces reserved for staff and service cars will be explored as part of a subsequent detailed design application.	3
Increase in traffic on the surrounding road network	As per the Traffic and Parking Impact Assessment submitted with the original application, the proposed development is not expected to result in significant adverse impacts on the surrounding public road network that will require mitigation.	66
Design of Access Road from St Vincent's Road is too steep / needs realignment	The proposed development is for a Concept Plan only and the final design of the access road from St Vincent's Road will be confirmed and submitted as part of a subsequent detailed design application.	2
Proposed internal road system is insufficient	As per the Traffic and Parking Impact Assessment submitted with the original application, the proposed internal road system is considered to be practicable, safe and able to accommodate expected traffic requirements.	1
Hospital Entrance requires traffic signals	As per the Traffic and Parking Impact Assessment submitted with the original application, the eastern entrance from River Road is to remain unsignalized to preclude right turns from exiting traffic, as requested by RMS. The western signalised access from River Road is to remain.	1
<b>Property Values</b>		
Negative impact on the value of surrounding property	Property values are not a relevant planning consideration for this application.	15
<b>Road Widening</b>		
Road widening leads to removal of landscaping	Road widening has been removed from the revised scheme in response to this concern.	3
<b>Safety</b>		
Increased traffic will put pedestrians at risk	As per the Traffic and Parking Impact Assessment submitted with the original application, the proposed development is not expected to result in significant adverse impacts on the surrounding public road network.	12
<b>Seniors Living / Zoning</b>		
Topography of area not appropriate for Seniors Living	An Accessibility Report has been prepared by Abe Consulting ( <b>Appendix D</b> ), confirming that the proposed development is capable of complying with the relevant accessibility requirements subject to the implementation of their recommendations at the subsequent detailed design phase.	9
Seniors Living not compliant with SEPP 65	A revised Architectural Design Statement has been prepared by Bickerton Masters and is attached at <b>Appendix O</b> , confirming the proposal's consistency with the Design Quality Principles of SEPP 65. An ADG Compliance Table has also been prepared at <b>Appendix P</b> , demonstrating that the seniors living building envelopes are capable of	1

Summary of Issue	Response	No. of times raised
	accommodating future development that is consistent with the ADG. This issue is further addressed at <b>Section 2.8</b> of the RTS report.	
Residential apartments have been disguised as Seniors Living	The specialist seniors living proposed by HammondCare as part of the development differs significantly from other forms of "seniors living" such as retirement living. The proposed seniors living is expected to attract older residents (75+ years of age) with chronic health care needs, with the seniors living aiming to bridge the gap between general community living and residential aged care by providing social and clinical support for older people who may lack family support or require specialised care but want to remain as independent as possible. Crucially, the seniors living accommodation proposed for Greenwich Hospital will all be offered on a licensed basis. As such, HammondCare will retain ownership of all units, which will not be able to be Strata subdivided and sold off to individuals. This issue is further addressed at <b>Section 2.1</b> of the RTS report.	12
The Seniors Living buildings have no relationship with the Hospital	Under the proposed scheme, the seniors living facilities form an integral part of the development that will be fully integrated into that of the hospital, sharing the same podium, basement parking and community facilities. Specifically, the 'continuum of care' model to be offered by the development will allow residents to access services as appropriate for their individual care needs and the integration and range of the specialist services proposed for the campus will give local residents the opportunity to remain living within their community. The serviced nature of the accommodation allows people to age in place and access the range of health services provided by HammondCare within their home environment, including with regards to chronic disease, prolonged duration of illness and complex co-morbidities. This issue is further addressed at <b>Section 2.1</b> of the RTS report.	32
Seniors Living not appropriate for SP2 zoned land; Seniors Living does not qualify as a Health Services Facility	SEPP Seniors permits seniors living developments on land zoned for SP2 Infrastructure 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 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. As discussed above, the seniors living component of the development is an integral part of the health services on offer and its operations cannot be separated from that of the hospital. This issue is further addressed at <b>Section 2.1</b> of the RTS report.	82
Seniors Living buildings should not be SSD	Clause 8(2)(a) of <i>State Environmental Planning Policy (State and Regional Development) 2011</i> (SEPP SRD) states that where a proposal comprises development that partly SSD (i.e. in this case, the Hospital use), the remainder of the development is also declared to be SSD where the SSD and remaining components are sufficiently related. This issue is further addressed at <b>Section 2.1</b> of the RTS report.	11
Seniors Living will reduce capacity for hospital to expand in future	The reconfiguration of the hospital, in addition to changes in the way patients are managed and improvements in medical treatments, is expected to improve efficiencies in the health care system. This means that the proposed increase in beds and serviced seniors living / residential aged care as part of this application may effectively lead to a tripling or quadrupling of patients given care over time, thereby negating the likelihood of needing to expand the hospital further over time. This issue is further addressed at <b>Section 2.1</b> of the RTS report.	25
Seniors Living part of redevelopment to large compared to Hospital; more residential than medical floorspace inappropriate	Under the revised scheme, the allocation of GFA has been reallocated and there is now more GFA allocated to health uses than seniors living uses. This issue is further addressed at <b>Section 2.1</b> of the RTS report.	20
Additional Seniors Living is not needed in the community / not supported by the community	The Greenwich Health Campus Vision attached to the RTS at <b>Appendix C</b> outlines the objectives of the proposed development and the important role the new Seniors Living will have in the future care of northern Sydney residents. By 2031, the number of people aged 65 or older in northern Sydney is expected to increase to 18% of	15

Summary of Issue	Response	No. of times raised
	the population and the need for specialist dementia care is estimated to double in NSW by 2051. The overarching objective of the development is to enable this demographic to continue to live well and maintain independence as they age. This issue is further addressed at <b>Section 2.1</b> of the RTS report.	
Seniors Living not compliant with Seniors Living SEPP	A detailed assessment of the development's compliance with SEPP Seniors is given in <b>Section 2.2</b> of the RTS, confirming that the proposed uses remain compliant with SEPP Seniors.	3
<b>Set Precedent</b>		
Will set precedent for further developments / flow on effects (general)	The proposed works are for the purposes of a specialised land use, namely a hospital and associated care facilities. It will therefore not set a precedent for future development of separate, non-comparable land uses.	2
Seniors Living uses will set precedent for high-rise apartments	As above, the proposed seniors living uses are of a specialised nature, to be operated by HammondCare as part of its 'continuum of care' model. The facilities will not be able to be Strata subdivided and sold off to individuals and cannot operate independently from the hospital. Therefore, these facilities are distinct from residential apartments and therefore will not serve as a precedent for further general residential development.	5
<b>Inadequate Consultation</b>		
Issues were raised by some members of the community post exhibition of the proposal in relation to the amount and format of community consultation undertaken.	HammondCare has undertaken an extensive consultation programme with the community and government agencies throughout the preparation of the amended proposal. A Community Consultation Summary Report is included at <b>Appendix Error! Reference source not found.</b> which provides an overview of the consultation undertaken to date and more recently, communication in response to individual submissions. HammondCare is also committed to ongoing community and stakeholder engagement throughout the life of the project. It is noted that in addition to the regular statutory exhibition requirements, HammondCare will endeavour to continue their program of engagement through the next phases of assessment of the Concept Plan and during the subsequent detailed design application(s).	-