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Executive Summary

The Environmental Impact Statement (EIS) in support of SSDA 8699 was publicly exhibited for a period of 51 days between 14 February and 5 April 2019, in accordance with the requirements of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

199 submissions were received in response to the public exhibition of the EIS, including submissions made by government agencies and authorities and the general public, as follows:

- Government authorities and agencies – 10;
- Community groups – 13;
- Members of the public – 176.

The Department has also prepared a letter setting out additional information to be submitted prior to the final assessment of the application.

Key issues raised within the agency and public submissions include:

- Integration of seniors living as part of the hospital;
- Consistency with SEPP Seniors;
- Bulk and scale / visual impact;
- Heritage;
- Biodiversity;
- Landscaping; and
- Amenity / SEPP 65 Compliance.

In responding to the range of matters raised in the submissions, HammondCare proposes to amend the scope of works of the application. Revised Architectural Plans, prepared by Bickerton Masters, are included at **Appendix A** and the key design amendments (as illustrated at **Figure 1**) include:

- Deletion of the seniors living villas on St Vincents Road and reallocation of GFA across uses, including a new respite care facility;
- Amended building envelopes with an overall reduction in height and scale to the seniors living buildings;
- Reconfiguration of building envelopes to improve sightlines to Pallister House and improve tree canopy retention;
- Amended landscape design focused on enhancing the heritage setting of Pallister House and providing usable and accessible areas of open space for patients and residents;
- Increased tree retention and planting of additional vegetation to achieve a net increase to tree canopy cover; and
- Removal of the basement from the curtilage of Pallister House.



Figure 1 Overview of proposed changes

Source: HammondCare

The overall nature of the changes proposed seek to respond to issues raised during the exhibition. The proposed amendments will reduce the environmental impacts of the development and will deliver an improved design outcome for the important health campus. Specifically, the amended scheme results in the following key improvements:

- An increase to the percentage of health care uses provided at the site, in addition to a new respite care facility;
- Overall reduction to the scale of development at the site, improving views, increasing tree canopy cover and enhancing sensitive interfaces;
- Improved landscape concept which focuses on protecting existing significant vegetation and improving the heritage curtilage of Pallister House;
- 48 additional trees will be retained and protected, in addition to at least 60 new trees that will be planted, resulting in a net increase of at least 5 trees at ground level;
- Reduced biodiversity impacts through the protection of more vulnerable vegetation; and
- The creation of new sightlines to Pallister House from River Road and an overall improved heritage outcome for the significant building.

1.0 Introduction

Ethos Urban has prepared this Response to Submissions Report on behalf of HammondCare following correspondence from the Department of Planning, Infrastructure & Environment (the Department), dated 17 April 2019, and the associated submissions received during the exhibition period of State Significant Development Application 8699 (SSDA 8699). The application seeks Concept Plan approval for the redevelopment of Greenwich Hospital, including new health care and allied health facilities, residential aged care and serviced seniors living.

The Environmental Impact Statement (EIS) in support of SSDA 8699 was publicly exhibited for a period of 51 days between 14 February and 5 April 2019, in accordance with the requirements of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

199 submissions were received in response to the public exhibition of the EIS, including submissions made by government agencies, authorities and the general public. The breakdown of submissions received is as follows:

- Government authorities and agencies – 10;
- Community groups – 13;
- Members of the public – 176.

The Department has also prepared a letter setting out additional information to be submitted prior to the final assessment of the application.

HammondCare and its specialist consultant team have considered all issues raised in the submissions made, pursuant to the requirements of the EP&A Act. This report sets out the responses to the issues raised in accordance with *Clause 85A of the Environmental Planning and Assessment Regulation 2000 (EPA Regulation)* and details the final project design and mitigation measures for which approval is now sought. The final project design includes amendments made by HammondCare pursuant to Clause 55 of the EPA Regulation, including changes to address matters raised in the submissions.

This report provides a response to all issues raised by the various government agencies and the general public. The key issues raised in submissions (government authorities and members of the public) can be broadly grouped into the following categories:

- Integration of seniors living as part of the hospital;
- Consistency with SEPP Seniors;
- Bulk and scale / visual impact;
- Heritage;
- Biodiversity and tree removal;
- Landscaping; and
- Amenity / SEPP 65 Compliance.

This report responds to each of the above issues and outlines the proposed amendments to the exhibited EIS. Where individual issues are not discussed in this report, a response can be found in the table at **Appendix B**.

1.1 Amendments to the Proposed Development

To reflect the design changes that have been made to the proposed development following public exhibition of the application, and to address issues raised in submissions, a range of updated plans and documents have been prepared.

Revised Architectural Plans have been prepared by Bickerton Masters and are included at **Appendix A**. The key design amendments include:

- Deletion of the seniors living villas on St Vincents Road and reallocation of GFA across uses, including a new respite care facility;

- Amended building envelopes with an overall reduction in height and scale to the seniors living buildings;
- Reconfiguration of building envelopes to improve sightlines to Pallister House and improve tree canopy retention;
- Amended landscape design focused on enhancing the heritage setting of Pallister House and providing usable and accessible areas of open space for patients and residents;
- Increased tree retention and planting of additional vegetation to achieve a net increase to tree canopy cover; and
- Removal of the basement from the curtilage of Pallister House.

The following consultants' reports and supporting information have also been updated where necessary, and further information has been provided to supplement the material originally submitted in support of the EIS:

- Revised Architectural Design Statement and ADG Compliance Table;
- Revised Landscape Concept Plans;
- Greenwich Health Campus Vision Document;
- Accessibility Report;
- Revised Arborist Report;
- Biodiversity Development Assessment Report;
- Bushfire Letter;
- Visual Impact Assessment;
- Revised Heritage Impact Statement;
- Structural Engineering Advice (Basement Impact on Pallister House);
- Aboriginal Cultural Heritage Advice;
- Preliminary Flood Study;
- Detailed Site Investigation (Contamination); and
- Community Consultation Report.

The revised supporting documentation enables the Department to undertake an informed assessment of the amended proposal. The findings of the revised supporting consultant documentation are summarised at **Section 4.0** of this report. A final schedule of the mitigation measures proposed to mitigate the impacts associated with the proposed works is provided at **Section 5.0**.

2.0 Key Issues and Proponent's Response

This section of the report provides a detailed response to the key issues raised by the Department, government agencies and authorities and the general public during the public exhibition of the SSDA. A response to each of the individual issues raised by the agencies and other submitters is provided at **Appendix B**.

Government Agencies and Authorities

10 submissions were received from government agencies and authorities in response to the exhibition of the EIS. Specifically, responses were received from:

- Ausgrid;
- Civil Aviation Safety Authority (CASA);
- Environmental Protection Authority (EPA);
- NSW Rural Fire Service (RFS);
- Office of Environment and Heritage – Environmental Division (OEH – Environment);
- Office of Environment and Heritage – Heritage Division (OEH – Heritage);
- Roads and Maritime Services (RMS);
- Sydney Water;
- Transport for NSW: and
- Lane Cove Council (Council).

A number of these submissions comprised the agency or authority confirming they had no comment on the application or providing guidance on recommended conditions of consent. These includes submissions from Ausgrid, CASA, EPA, RMS and Sydney Water.

The remaining government authorities to make a submission, raised a variety of issues and sought clarification on a number of matters as detailed in this section and/or at **Appendix B**. The Department also provided a letter summarising the key matters to be addressed and additional information to be provided.

Members of the Public

A total of 176 public submissions were received, of which 160 objected to the proposal, 9 provided comments and 7 offered support. These submissions raised a variety of issues which have been addressed with the agency issues below. An overview of the responses to the issues raised by all public submissions is provided at **Appendix B**.

2.1 Integration of Seniors Living Within the Hospital and Permissibility

2.1.1 Issue

Council has raised concern with the proposed seniors living component of the development and its compatibility with the SP2 Infrastructure (health service facility) zoning of the site. Council are of the view that the seniors living accommodation is not compatible with the intended use of Greenwich Hospital and would compromise the ability of the site to extend the provision of medical infrastructure in the future. In addition, Council raised issue with the proposed allocation of GFA across the proposed uses in that a development primarily for a health facility has more residential GFA.

The Department has requested clarification around the operation of the seniors living use and how this will operate in combination with the hospital and what services will be offered.

2.1.2 Proponent's Response

Background of HammondCare

HammondCare is an independent Christian charity (ACN 48000026219) that specialises in dementia and aged care, palliative care, rehabilitation and older people's mental health. They are committed to supporting people of low or no financial means as part of their mission and are recognised both nationally and internationally as being one of Australia's most innovative health and aged care providers. They offer hospital care, residential care, and community services across NSW, QLD, ACT and Victoria, and Dementia Support Australia nation wide.

HammondCare is listed as an Affiliated Health Organisation under Schedule 3 of the Health Services Act 1997, meaning it is recognised as part of the public health system. Section 13(3) of the Act cites the principal reason for recognising affiliated health organisations is to enable certain non-profit, religious, charitable or other non-government organisations and institutions to be treated as part of the public health system where they control hospitals, health institutions, health services or health support services that significantly contribute to the operation of that system.

Accordingly, HammondCare is best defined as a health care provider and plays an important role in the public health care system.

Vision for the Greenwich Health Campus

HammondCare has prepared a Greenwich Health Campus Vision (**Appendix C**) to outline the objectives of the proposed development and the important role the new facility 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 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 via access to appropriate support and care.

The long-term vision of the proposed Concept Plan involves transforming the Greenwich Hospital from a dated, 1960's facility which is no longer fit for purpose, into an integrated, contemporary healthcare campus with specialised care services for seniors and people with complex health needs to meet the growing community demand in Northern Sydney Local Health District (NSLHD). The new Greenwich Health Campus moves away from traditional, siloed models of sub-acute services to better respond to the changing needs of the ageing community, **consistent with the NSW State Health Plan – Toward 21 which focuses on delivering integrated and connected health care**. This will also address concerns of the NSLHD regarding the availability of aged care services to support the timely discharge of patients from acute care. Studies evaluating preventative and integrated models of care delivery have demonstrated significant savings to government through improved system efficiencies (reduction in Potentially Preventable Hospital admissions and cost savings) and user outcomes, particularly for people with complex and chronic needs.

This will be achieved through HammondCare's unique 'continuum of care' model, involving the expansion and integration of specialised health services, and short, medium and long-term accommodation options. The proposed specialised services and functions of the health campus include:

- Day and overnight respite;
- Short Term Restorative Care programs;
- Inpatient and outpatient rehabilitation services;
- Older persons mental health and positive ageing services;
- Palliative and supportive care;
- The Centre for Learning and Research;
- Residential aged care with specialised support services available for people living with dementia and their carers; and
- Serviced seniors living with 24/7 support services to provide 'hospital in the home' opportunities for older people to stay in their homes longer (it is noted that such facilities are not presently available in the Lane Cove LGA).

Integration of Seniors Living

The continuum of care model allows people to access services as and when 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. This has proven to be critical to maintaining social connections and improved mental health outcomes for patients.

The proposed seniors living use is an integral part of the development and represents an innovative approach to providing care in response to the changing health needs of the community which is characterised by higher incidents of chronic disease, prolonged duration of illness and complex co-morbidities. 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. The model also provides the significant benefit of facilitating couples with differing care needs to remain living together by providing crucial support and services.

Integrated models of care have been proven to not only improve the health outcomes of its users, but to result in significant savings to government by reducing Potentially Preventable Hospital (PPH) admissions. Accordingly, health care models are progressively focusing on preventive and restorative programmes to reduce pressure on acute services and it is anticipated that this trend will be increasingly important as the population ages. In this regard, the Greenwich Hospital redevelopment, which includes integrated seniors living, is at the forefront of best practice care.

Protection of Health Service Facility Uses

It is important to distinguish between the specialist seniors living proposed by HammondCare and other forms of seniors living such as retirement living. **Figure 2** depicts the range of seniors living typologies generally available and, whereas retirement living developments may cater to those aged 55+ who are largely independent, the proposed seniors living is expected to attract older residents (75+ years of age) with chronic health care needs. **Appendix D** provides further detail on the changing and emerging seniors living products. The accommodation aims 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.

Importantly, unlike some other forms of retirement living, 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. Furthermore, as shown at **Appendix A**, the staging of the development has been restructured so that the new hospital building is the first of the buildings to be constructed. This removes any doubt that the seniors living component may be completed and operated on its own, without the proper integration of the critical health care services.

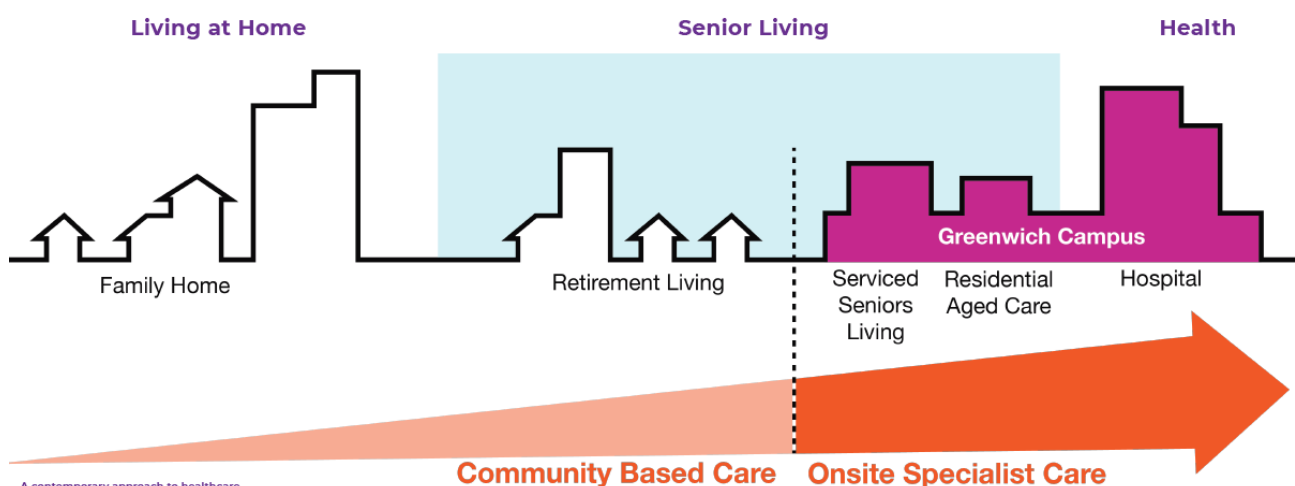


Figure 2 Seniors living typologies

Source: HammondCare

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 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. For example, in 2018 HammondCare provided 2,492 community care visits which supported members of the community living within their own home. This preventive approach to health care minimises Potentially Preventable Hospital (PPH) admissions and reduces the demand for hospital GFA which can be used more efficiently.

Furthermore, it should be noted that the seniors living buildings will not be Strata subdivided and therefore could be converted to other health related uses in the future as health care models continue to evolve.

Development Feasibility

The inclusion of seniors living as part of the health campus is a responsible use of the site to ensure the long-term financial sustainability of HammondCare's broader range of services. As there is no public money or government funding for capital works on Schedule 3 hospitals, the capital for this important project is fully funded by HammondCare who relies on revenue from its operations, donations and government grants to fund their network of care services. Hospitals have minimum operational and design requirements in order to be financially viable and without the seniors living component, the proposed redevelopment is unsustainable. Therefore, not providing, or significantly reducing, the seniors living use of the campus 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 or place the responsibility and financial burden back on to NSW tax payers.

Proposed Amendments to Concept Plan

Notwithstanding the clear benefits provided by integrating seniors living and health care services (and the financial necessity of doing so), HammondCare has reconsidered certain aspects of the proposal in response to the concerns raised regarding seniors living being the dominant use of the site.

The Concept Plan has been amended to reduce the quantum of seniors living GFA proposed by removing the senior villas building in the south eastern corner of the site and converting the north eastern villa buildings to a respite care centre use. This results in the total GFA of traditional health service facilities of the site increasing from 13,900m² to 14,500m², and the total seniors living GFA decreasing from 14,400m² to 13,000m². Accordingly, the distribution of GFA now favours traditional inpatient/outpatient hospital related uses 52.7% to 47.3% of seniors living uses. Furthermore, as outlined above, the staging of the Concept Plan has been reordered to prioritise the hospital building and remove any doubt that the seniors living buildings may be constructed in isolation.

Permissibility and State Significant Development

The site is zoned SP2 Infrastructure under the Lane Cove Local Environmental Plan (LEP) 2009, which permits uses relating to the purpose shown on the land zoning map (Health Services Facility) and any development that is ordinarily incidental or ancillary to development for that purpose. Health Services Facility is defined as:

Health Services Facility means a building or place used to provide medical or other services relating to the maintenance or improvement of the health, or the restoration to health, of persons or the prevention of disease in or treatment of injury to persons, and includes any of the following:

- (a) a medical centre,
- (b) community health service facilities,
- (c) health consulting rooms,
- (d) patient transport facilities, including helipads and ambulance facilities,
- (e) hospital.

The proposed hospital related uses are therefore permissible with consent in the zone.

Furthermore, SEPP Seniors permits seniors living development on land zoned special uses if it adjoins land zoned primarily for urban purposes regardless of whether the use is permissible in the land use zone. Importantly, Clause 24(1)(ii) of the SEPP states that if a site is zoned for a special use that permits hospitals (such as the site), a site compatibility certificate is not required. 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 outlined in the following sections, the project is consistent with the relevant provisions of SEPP Seniors.

State Significant Development

Under Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD), 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'. As demonstrated below, the proposed development, which incorporates the hospital and seniors living uses, is for a single, integrated development with significant physical and functional links between the uses.

A key design principle of the health campus is the synergy between functions that are both reliant and complimentary to each other. As a result, the composition, placement and interrelationships of differing functions are carefully considered to form a single, integrated development. This is evident in that:

- The health service facility use of the site is the dominant use with the seniors living buildings forming an integrated component of this overarching use;
- The proposed buildings are physically linked in that they share a common podium, basement and shared facilities (such as communal areas, swimming pool, and health facilities);
- The uses are interrelated with the seniors living buildings being serviced with health support and services as part of the broader health facility;
- The health campus is all owned and operated by HammondCare as an Affiliated Health Organisation;
- The seniors living is targeted towards older members of the community with specific care needs and cannot be Strata subdivided for individual residential sale; and
- Integration of uses is at the core of HammondCare's continuum care model (see above).

Accordingly, the seniors living uses are permissible at the site pursuant to SEPP SRD and the whole development constitutes SSD in accordance with Clause 8(2) of SEPP SRD.

Conclusion on the Integration of Seniors Living

In summary, HammondCare's innovative 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 permissible use via SEPP Seniors and is an integral part of the wider hospital development and HammondCare's continuum of care model. The integrated campus will respond to the future trends of health care and will provide for residents of northern Sydney for the next 50 years.

2.2 Consistency with SEPP Seniors

2.2.1 Issue

Both Council and the Department have questioned the consistency of the proposal with various provisions of SEPP Seniors. The Department has requested further information to demonstrate compliance with the following clauses of the SEPP:

- Clause 26 Location and Access to Facilities;
- Clause 29 Consent Authority to Consider Certain Site Compatibility Criteria;
- Clause 30 Site Analysis;
- Clause 33 Neighbourhood Amenity and Streetscape;
- Clause 38 Accessibility; and

- Clause 50 Standards That Cannot Be Used to Refuse Development Consent.

Transport for NSW also raised issue with the lack of accessible pathways to support the seniors living use and noted the River Road bus stop at St Vincents Road is not DDA compliant. Transport for NSW recommended the Concept Plan identify measures to improve accessibility to and from bus stops and the safety for pedestrians crossing River Road.

2.2.2 Proponent's Response

The proposal is consistent with the provisions of SEPP Seniors. Additional information demonstrating consistency with each of the identified clauses is provided in the following sections.

Clause 26 Location and Access to Facilities

Development meets the requirements of Clause 26 of SEPP Seniors if it has access to the specified facilities via public transport which is located within 400m of the site and which is accessible by DDA standards. Bus stops located outside the site's north western boundary are located along both sides of River Road and provide direct access to Chatswood, Lane Cove and Kings Street Wharf in the Sydney CBD via route 261. These centres provide all facilities listed at Clause 26(1) of the SEPP. Bus route 261 operates 6 days per week and provides regular services in both directions along River Road in the morning and afternoon periods. Wheelchair accessible services are also provided for the majority of these services.

It is noted that there are two additional bus stops at the intersection of St Vincents Road and River Road, as identified by Transport for NSW, however these bus stops are not the nearest facilities to the seniors living buildings and are not relied upon to achieve the requirements of the SEPP.

Abe Consulting has reviewed the amended Concept Plans and confirm that the bus stops are located approximately 15m and 28m respectively from the entry door of the northern seniors living building lift lobby and 135m and 158m respectively from the southern seniors living building (refer to **Figure 3**). The Survey Plans, prepared by LTS Lockley, has also been reviewed by Abe Consulting to confirm that the relevant gradients between the accommodation and the bus stops are suitable for people with a disability (**Appendix E**).

Following this review and the adoption of the report's recommendations during the detailed design phase of the development, ABE Consulting confirm that future development of the site is capable of achieving all required accessibility standards and will satisfy Clause 26 of SEPP Seniors.

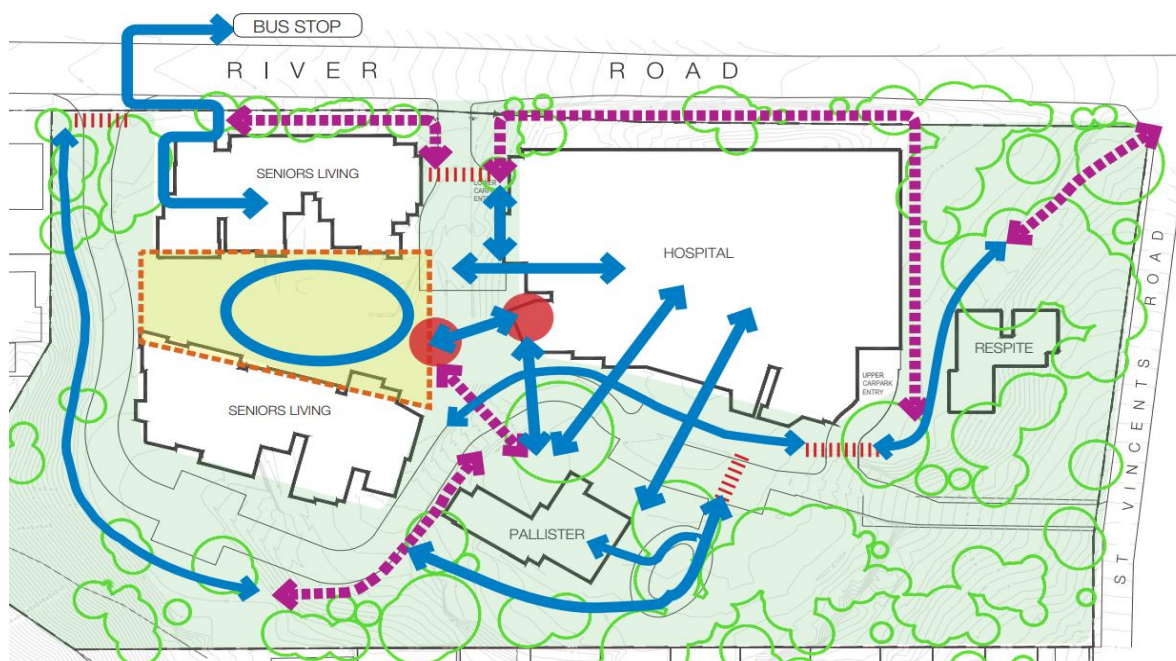


Figure 3 Accessible paths of travel

Source: Taylor Brammer

Clause 29 Consent Authority to Consider Certain Site Compatibility Criteria

The Department has requested consideration be given to the criteria listed at provisions 25(b)(i) and (b)(v) of Clause 29 of the SEPP. These include:

(b) is of the opinion that the proposed development is compatible with the surrounding land uses having regard to (at least) the following criteria:

(i) the natural environment (including known significant environmental values, resources or hazards) and the existing uses and approved uses of land in the vicinity of the proposed development,

v) without limiting any other criteria, the impact that the bulk, scale, built form and character of the proposed development is likely to have on the existing uses, approved uses and future uses of land in the vicinity of the development,

These provisions are addressed below.

Clause 25(5)(b)(i)

The Department considers the extent of tree removal proposed to facilitate the development and the requirement for almost the entire site to be maintained as an Inner Protection Area for bush fire protection to be incompatible with the surrounding land uses and character of the area.

Since submission of the original application, an updated Tree Survey has been undertaken to understand the true impact of the proposal on existing trees and to identify additional trees that are able to be protected through changes to the building envelopes.

As described at **Section 3.0** below, the amended Concept Plan (**Appendix A**) deletes the seniors living villas in the south western corner of the site and redesigns the building envelopes of the other proposed buildings to maximise the retention of trees and provide opportunity for new vegetation to be planted. Additionally, the western entry road will now be kept at its existing width to avoid impacting existing significant trees in this area.

These changes have resulted in a significant increase to the number of trees being retained, with 211 existing trees to now be protected (including trees on neighbouring properties, immediately adjacent the boundary), 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 ground level. 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.

A revised Arborist Report has been prepared by Redgum Horticultural for the amended Concept Plan (**Appendix F**). There are currently 297 trees on or immediately adjacent the site that have been considered and the species and location of each of these trees is identified within the assessment report. This includes 254 trees within the site boundary and a further 46 trees immediately adjacent which contribute to the canopy cover of the site.

The report recommends removal of a total of 86 trees, of which 31 are recommended for removal as they are structurally compromised, already dead or they are exempt specimens and their removal will reduce competition for locally indigenous specimens.

To accommodate the future redevelopment, it is anticipated that up to 55 existing trees at the site will need to be removed where the future building footprints and associated infrastructure would potentially impact on their health and transplantation elsewhere on site is not a viable option. Notwithstanding the proposed tree removal, the concept landscape plan proposed will mitigate the loss of these trees as they are replaced with a variety of new species to ensure an adequate canopy is maintained. Accordingly, the removal of trees is considered appropriate given their proposed replacement as part of the high quality landscape strategy, and in context of the broader community benefits delivered by the site's redevelopment. The proposed tree removal will be considered further as part of the subsequent detailed DA and minimised where possible.

It is also clarified that there is no requirement for almost the entire site to be maintained as an Inner Protection Area. FPA Australia has reviewed the RFS submission and provided 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 G**).

Therefore, it is considered that the proposal is compatible with the site and surrounding land uses having regard to the natural environment.

Clause 25(5)(b)(v)

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

It is important to understand that the height and scale of the proposed building envelopes is based on the necessary minimum operational and design requirements of the health care campus. Hospitals by nature are designed primarily for functionality to ensure efficient delivery of care and hence life safety which necessitates vertical building typologies, rather than smaller, sprawling designs that result in inefficient operations. Vertically designed facilities complement contemporary models of patient centred care by improving accessibility for patients and workflow for staff, resulting in improved quality of care and safety. For example, vertically designed buildings reduce distances staff have to travel to attend to patients and access equipment. Furthermore, patients are able to access communal facilities via a lift as opposed to walking 200m across the site.

Other design benefits of vertical hospitals include:

- Enhanced communication between multi-disciplinary teams and patient care outcomes through co-location of facilities;
- Strong connections to external landscaped spaces for respite and therapy and the ability to capitalise on natural light and views for overall wellbeing;
- Enhanced way finding, accessibility and security for residents, patients and visitors/families;
- Reduced lateral travel distance on floor plates and quicker response times;
- Better separation of circulation between patients, staff and goods/services
- Greater efficiency in building service provision and energy use;
- Improved infection control; and
- Increases opportunities for significant and varied outdoor areas which can contribute to reduced length of stay.

A commitment to protecting and enhancing the landscaped setting of the campus also influences the proposed vertical design of the proposed buildings. The vertical design is informed by Singapore's Khoo Teck Puat Hospital and its incorporation of biophilic design principles which are based on the concept that humans have an inherent need to connect with nature, even in modern settings, and that this connection improves their mental and physical well-being. In this regard, the landscaped setting is a unique asset of the site and the amended landscape seeks to maximise its use for shared recreation facilities and improved patient/resident experience and staff wellbeing.

The need to facilitate functional design is supported by the attributes of the SP2 Infrastructure zone and the fact that there is no height or FSR development standards applying to the site. This is often the case for special infrastructure zones, particularly those supporting health service facilities, as functionality is a core consideration for design. It is different to a typical commercial or residential development where the primary objective is to maximise GFA for sale. In this regard, it is recognised that the proposed building envelopes are larger than other development within the immediate surrounds (although it is noted that the broader site context does include development of 4-5 storeys fronting River Road), however, that does not necessarily mean that the development is incompatible with its surrounds.

A recent court case (*Catholic Healthcare Limited v Randwick City Council [2019] NSWLEC 99*) highlighted that 'compatibility is different from sameness and it is generally accepted that buildings can exist in harmony without having the same density and scale of appearance'. When considering compatibility, the design of the development cannot be expected to be a replication of the surrounding development. This is particularly true in relation to development pursuant to SEPP Seniors because design considerations are driven by functional requirements of a use that would otherwise not be permissible in the zone. In addition, the case recognises that large, strategic sites best demonstrate compatibility through a master planning process or detailed site analysis. In these instances, compatibility can be achieved through design measures such as stepped building forms and concentrating building mass in areas of the site which have the least impact on its surrounds.

The Greenwich Hospital site has undergone an extensive masterplanning process based on a detailed Site Analysis (refer to **Appendix N**). This process has informed the layout and massing of the proposed building envelopes which carefully balances a number of competing planning objectives as well as the functional and design needs of the campus.

Notwithstanding the strict functional requirements of the development, the Concept Plan has been carefully reviewed by the design team as part of the response to submissions process and, with additional design work undertaken, opportunities to substantially reduce the scale of the building envelopes in specific areas of high impact have been identified. These built form changes include:

- A reduction to the building envelope at the western edge of the northern seniors living building and deletion of the driveway widening. This improves the interface with the residential dwellings to the west by stepping the façade to provide a more appropriate transition in scale and maximising retention of existing tree canopy. **Figure 4** below depicts the significant reduction to the building envelope achieved at this part of the site.
- A reduction to the building envelope of the southern seniors living building to minimise visual impact and to improve the building's interface with the heritage listed Pallister House (refer to **Section 2.3** below).
- Reconfiguration of building podium to open up new sightlines to Pallister House from River Road (refer to **Section 2.3** below) and retain additional tree canopy in the north eastern corner of the site along River Road.
- Deletion of the southern seniors living villa and replacement of the northern villa with a respite care centre. This amendment improves the retention of trees in the south eastern corner of the site which improves the heritage curtilage of Pallister House from its main approach from St Vincents Road.

A full summary of changes is provided at **Section 3.0** below and depicted in the Amended Architectural Plans (**Appendix A**). As a whole, these changes substantially reduce the bulk and scale of the development and protects core vegetation which screens and softens the perceived built form massing. Design Guidelines (**Appendix O**) have also been developed by Bickerton Masters to ensure the key principles of the amended Concept Plan are reflected in the detailed design of the health campus

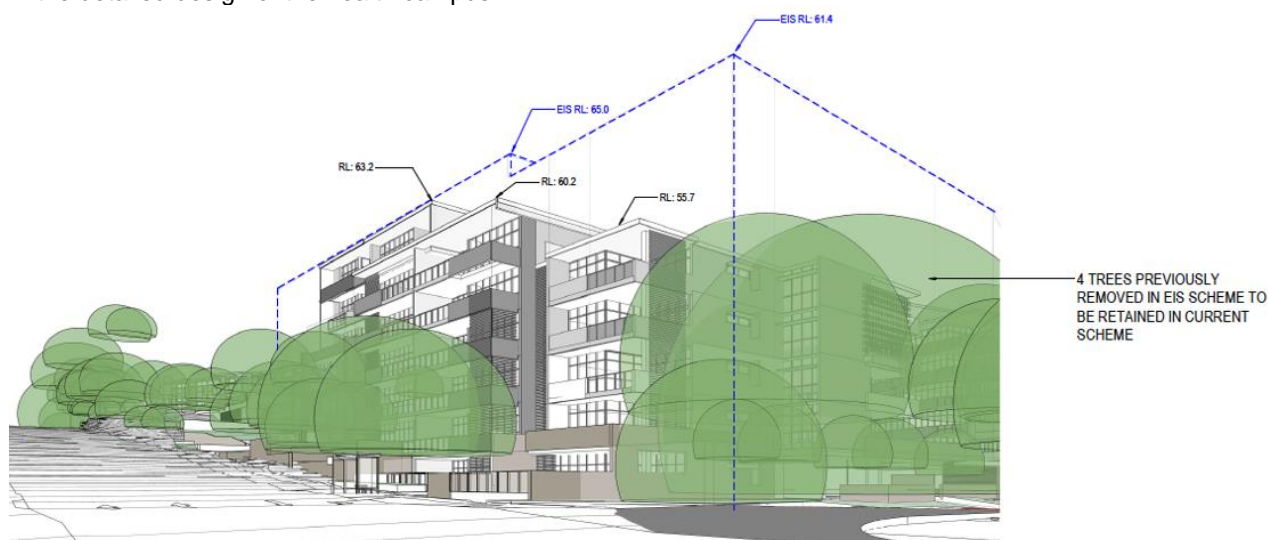


Figure 4 Comparison of before and after building envelopes as viewed from River Road

Source: Bickerton Masters

A Visual Impact Assessment (VIA) of the amended scheme has been undertaken by Clouston Associates in accordance with NSW Land and Environment Court principles (**Appendix H**) to assess the visual impact from key public and private vantage points, including from Northwood which is located across the valley to the west. **Figure 5** shows extracts of the current and proposed views from a private residence on Upper Cliff Road, Northwood.

This viewpoint is rated as having a moderate/high impact but is considered acceptable in the overall context of the development as the view is not extensive in terms of the visual catchment, rather it represents the view of one private residence only. It is noted that views from public places, including Gore Creek Reserve (refer to **Figure 6**), which are considered more important in accordance with the Land and Environment Court principles, experience only a minor visual impact. Furthermore, the seniors living building envelopes have been significantly cut back and refined as part of the amended Concept Plan. Any additional reductions to these envelopes would not result in substantial improvements to this view that would justify the wider cost of reducing the design, functional and financial attributes of the health care campus. Notwithstanding, it is emphasised that this modelling is based off worst-case scenario building envelopes which will be refined as part of the future detailed design application.

It is noted that an alternative design for the campus could involve reducing the height of the proposed buildings to a low-rise design, however this would result in a far higher site coverage, loss of outdoor recreational opportunities and an unacceptable loss of significant vegetation which would result in a greater visual impact.

On balance, and subject to detailed design, the VIA concludes that the visual impacts of the proposal are considered to be acceptable. The amended scheme strikes an appropriate balance between providing the necessary floor space and functional requirements for the Greenwich Campus and minimising the impact of the bulk and scale of the building envelopes on other uses in the vicinity of the development, in accordance with Clause 25(5)(b)(v) of SEPP Seniors.



Current



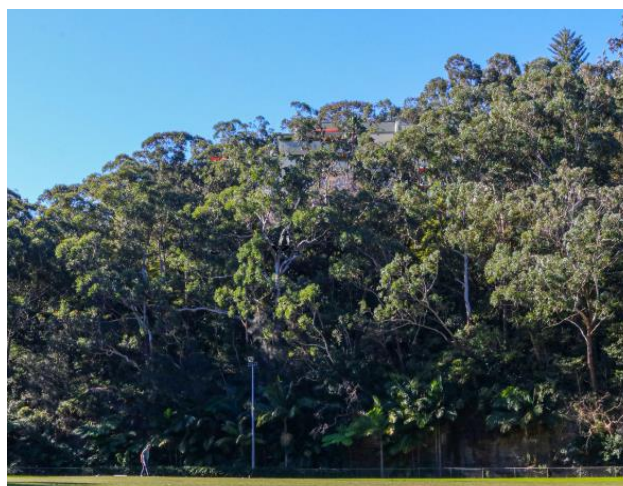
Proposed

Figure 5 Visual impact from 46A Cliff Road

Source: Clouston Associates



Current



Proposed

Figure 6 Visual impact from Gore Creek Reserve

Source: Clouston Associates

Clause 30 Site Analysis

As requested by the Department, a revised Site Analysis is provided at **Appendix N**, containing all information required by Clause 30 of the SEPP. This Site Analysis has helped to inform the revised Concept Plan as outlined above.

Clause 33 Neighbourhood Amenity and Streetscape

The Department considers the proposed development to be contrary to Clause 33 of the SEPP for the following reasons:

- The character of the area is defined by low density residential development generally one and two storeys, with only the existing hospital buildings exceeding this height.
- The seniors living buildings are considered inconsistent with the desirable elements of the location's current character and would not contribute to the quality and identify of the area.
- The proposed development would not complement and sensitively harmonise with the heritage listed Pallister House.
- The proposal does not adopt building heights compatible in scale with adjacent development and requires extensive removal of vegetation across the site contrary to this clause.

Accordingly, the Department recommended the proposal be amended to reduce the extent of seniors living proposed on the site.

As outlined above, the amended scheme significantly reduces the overall bulk and scale of the seniors living buildings to minimise any impacts on their surroundings. The amended proposal also completely removes the seniors living villas on St Vincents Road, reconfigures the podium and hospital building envelopes and improves the retention of significant trees across the site. Combined, these changes substantially reduce the overall bulk of the proposed building envelopes and mitigates the perceived scale of the development. **Section 2.3** below addresses heritage and the positive impacts arising from the amended Concept Plan.

Whilst it is noted that the scale of the development remains larger than the site's immediate surrounds, the broader catchment is characterised by a wide range of building typologies and scales. This is particularly noticeable east of the site along River Road which includes a number of residential flat buildings of 4-5 storeys.

Furthermore, an extensive masterplanning process has been undertaken to ensure the design of the building envelopes minimise impacts on surrounding development and Land and Environment Court precedents recognise that buildings can exist in harmony without having the same density and scale of appearance (as outlined at

Section 2.2.2 above). Accordingly, the Concept Plan is not considered to be inconsistent with the character of the area and achieves the objectives of Clause 33 of SEPP Seniors.

Clause 38 Accessibility

Due to the site's topography, the Department has requested information to demonstrate how accessibility across the site would be achieved to provide attractive and safe environments for residents and visitors.

Abe Consulting (**Appendix E**) has undertaken a review of the amended Concept Plan and confirm that the proposal is capable of complying with the relevant accessibility requirements subject to the implementation of their recommendations at the subsequent detailed design phase.

Clause 50 Standards That Cannot Be Used to Refuse Development Consent

The Department acknowledges the concept nature of the proposal, however has queried whether the proposed envelopes will achieve solar access in accordance with Clause 50 of SEPP Seniors.

Solar access modelling has been undertaken as part of the revised Concept Plan which demonstrates how the proposed building envelopes are capable of achieving 3+ hours of solar access to over 70% of the seniors living dwellings, midwinter. It is noted that each of the buildings achieve this standard independently, with the northern building achieving 3+ hours of solar access to 79% of the dwellings and the southern building achieving the required solar access to 70%.

2.3 Heritage

2.3.1 Issue

OEH's Heritage Division raised a number of concerns in regard to the relationship of the proposed development to Pallister House. OEH suggest that the Concept Plan is an opportunity to make Pallister House a focal point of the site with consideration of adequate setbacks and retention of view lines, particularly along St Vincents Road as this is within the curtilage of the item. In this regard the seniors living villas would dramatically alter the approach to the heritage item and the appreciation of its landscaped setting. OEH recommend relocating the seniors living villas further toward River Road in the north eastern section of the site to retain more of the existing significant vegetation and enhance the setting of Pallister House.

OEH raised issue with the scale of the hospital building and its potential to dominate Pallister House. Specifically, views along St Vincents Road access on approach to Pallister House would be dramatically altered by the height difference between the old and the new. OEH recommend further efforts to mitigate these impacts be considered, including a reduction in height, increased setbacks and moving the bulk further towards River Road. These amendments would also reduce overshadowing of Pallister House. In relation to the seniors living buildings, OEH suggest these could be moved further west away from Pallister House to create a generous landscaped buffer zone.

OEH are also concerned that the proposed basement car park would encroach into the curtilage of Pallister House and may adversely impact on the structural integrity of the building. OEH recommend the basement be moved outside of this area.

2.3.2 Proponent's Response

The amended Concept Plan (**Appendix A**) addresses the heritage concerns raised by OEH in their submission and has been prepared following a site visit with representatives from OEH's Heritage Division on 1 July 2019, where the proposed design amendments were discussed. NBR Architecture has also reviewed the amended Concept Plan and has prepared commentary on the heritage impacts of the proposed changes (**Appendix I**).

As described above, the southern seniors villa building on St Vincents Road has been removed from the proposal and the northern villa has been replaced with a new respite care facility. These modifications go above and beyond the recommendations made by OEH in relation to the villas and allow for the retention of exiting views to Pallister House from St Vincents Road and the retention of significant vegetation to preserve the landscaped character of

this important heritage curtilage. In addition, the modified proposal opens up new views to Pallister House from River Road which are currently hidden by the existing hospital building (refer to **Figure 7**).



Figure 7 View to Pallister from River Road

Source: Bickerton Masters

Concerns raised with the scale of the proposed building envelopes in relation to Pallister House have been addressed by amending the hospital podium envelope to include a 2-3 storey projecting form that relates to the scale of Pallister House and reducing the bulk of the adjacent built form and landscape buffer. It should also be noted that the previously submitted plan set included a section plan which distorted the proposed separation between the buildings and as such the revised section plans depict a more accurate representation of this. **Figure 8** has also been prepared to demonstrate the proposed treatment of this important interface.



Figure 8 Pallister House interface

Source: Bickerton Masters

As described at **Section 2.6** below, the revised Landscape Concept Plan focuses on enhancing the heritage setting of Pallister through the use of plant species that are reflective of the cultural heritage and time period. The opportunity to retain and interpret the location of the former 'Bridle Path' between Pallister House and the corner of St Vincents Road and River Road has also been retained as part of the amended proposal as an important heritage feature. Furthermore,

In accordance with the recommendations of OEH, the proposed basement envelope has been removed from the curtilage of Pallister House. Wood and Grieve Engineers has also reviewed the amended Concept Plan and provided a statement confirming that there is sufficient clearance to the Pallister building to not have an adverse structural impact on the heritage structure (**Appendix J**). The provision of a basement outside of the heritage curtilage will further enhance the setting of Pallister by facilitating the replacement of the significant areas of at-grade carparking with new landscaping and communal areas.

The amended Concept Plan does not propose to reduce the height of the hospital building due to the important design, operational and feasibility considerations identified at **Section 2.1** above. However, significant reductions to the built form in other parts of the site and a focus on enhancing the Pallister House curtilage through landscaping results in a more positive heritage outcome at the ground plane where it is most desirable. In this regard, reducing the height of the hospital building would not significantly improve the setting of Pallister House and would come at a substantial cost to the important health services offered at the site.

On balance, the amended scheme significantly improves the relationship of the proposed building envelopes with Pallister House and a concept landscape plan has been prepared to demonstrate how this important interface can be enhanced through the detailed design process. Accordingly, it is considered that the amended Concept Plan has appropriately responded to OEH's comments.

2.4 Aboriginal Archaeology

2.4.1 Issue

OEH – Heritage has requested further Aboriginal cultural heritage assessment be undertaken in relation to the proposal, including subsurface archaeological testing along the eastern side of the site prior to any ground disturbing impacts. It was also recommended that a comprehensive Aboriginal Heritage Management Plan (AHMP) be developed and approved by the Secretary prior to ground disturbing works to ensure that impacts to Aboriginal cultural heritage are known and appropriate management strategies can be developed.

2.4.2 Proponent's Response

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 K**) 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.

2.5 European Archaeology

2.5.1 Issue

OEH – Heritage supports the proposed approach to undertake physical investigation of areas in the south of the site (around Pallister House) prior to works involving ground disturbance. The findings of these investigations should inform the final design of the development and the interpretation of Pallister House.

2.5.2 Proponent's Response

Similar to the approach for investigations relating to Aboriginal cultural heritage, physical investigation of other 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.

2.6 Landscaping

2.6.1 Issue

The Government Architect, Council and OEH all requested further detail in relation to the proposed landscaping and extent of tree removal required for the development. Generally, it was considered the proposed building envelopes would require excessive vegetation removal which would reduce canopy cover and impact the landscape character of the site. OEH also suggested landscaping could be used to enhance the heritage setting of Pallister House.

2.6.2 Proponent's Response

A revised Concept Landscape Plan (**Appendix L**) has been prepared by Taylor Brammer in response to issues raised within the submissions and feedback provided by OEH – Heritage during their site visit and subsequent consultation. An extract of the Site Landscape Plan is shown at **Figure 9**.

The revised Concept Landscape Plan focuses on enhancing the tree canopy of the site and improving the heritage setting of Pallister House. In this regard, the proposed landscape character features indigenous native mature planting to the boundary zones to soften the edges of the site and screen the building envelopes of the health campus beyond.

A range of cultural planting associated with Pallister House will provide a period garden that contributes to the curtilage of this important heritage building and enhance the interface with the proposed surrounding built form. The retention of the 'bridle path' will also result in a positive heritage impact, enhance permeability add to the rich landscaped character of the site.

The landscape concept design promotes accessibility to all buildings, site facilities and transport services. There are only some non-essential paths that wheelchair access cannot be provided due to slope constraints.



Figure 9 Revised Landscape Plan

Source: Taylor Brammer

2.7 Biodiversity

2.7.1 Issue

OEH has identified a number of issues with the Biodiversity Development Assessment Report (BDAR) undertaken for the project. The applicant should ensure correct application of the Biodiversity Assessment Method with reference to the BDAR checklist provided at Appendix 10.

2.7.2 Proponent's Response

A new BDAR Report has been undertaken by a new consultant, Ecological Australia (**Appendix M**), in accordance with the Biodiversity Assessment Method 2017 (BAM) established under **Section 6.7** of the *NSW Biodiversity Conservation Act 2016*. This assessment considers the potential impacts associated with the amended Concept Plan forming part of this response to submissions. As outlined at **Section 2.6** above, it is noted that the amended scheme has carefully considered ecological impacts and measures, including the removal of the south western seniors living villas and reducing the footprint of other building across the site which has improved tree retention and the overall ecological performance of the Concept Plan.

Three Plant Community Types (PCTs), comprising four vegetation zones are present within the development site and none of these species represent listed Threatened Ecological Communities. Development in accordance with the Concept Plan will likely require the removal of 0.02ha of PCT 1776 moderate condition and 0.24 ha of PCT 1776 managed understorey at the site. This will require a total of three ecosystem credits to offset the 0.26ha of unavoidable impacts.

PCT 1788 and PCT 1828 will not be impacted by the proposed development and it is understood this bushland will be retained as a conservation area.

Large-eared Pied Bat is listed as a vulnerable species and is assumed to be present at the site in the absence of targeted surveys being undertaken. On this basis, a total of five species credits will be required as offsets.

It is noted that the BDAR is based on the worse-case scenario and relates to a Concept Plan only. The subsequent detailed design will endeavour to reduce environmental impacts wherever possible, particularly in relation to vulnerable flora and fauna.

2.8 Amenity / SEPP 65 (Design Quality of Residential Apartment Development)

2.8.1 Issue

The Department considers the proposal to be inconsistent with Design Quality Principles 1 and 2 contained in Schedule 1 of SEPP 65 and Council has raised concern with overall compliance with the ADG. The Department has therefore requested that the applicant demonstrate how the development could achieve the relevant requirements of SEPP 65 and the Apartment Design Guide.

2.8.2 Proponent's Response

A revised Architectural Design Statement (**Appendix N**) has been prepared based on the amended Concept Plan to demonstrate the proposal's consistency with the Design Quality Principles of SEPP 65 and an ADG compliance table (**Appendix P**) shows how the proposed seniors living building envelopes are capable of accommodating future development that is consistent with the ADG.

2.9 Architectural Details

2.9.1 Issue

The Department has requested further architectural details to be provided on the plans, including; existing ground levels, finished ground levels, additional sections through the development to demonstrate the relationship with Pallister House, and setbacks from the boundaries to establish the location of building envelopes.

2.9.2 Proponent's Response

The revised Architectural Plans (**Appendix A**) include the additional architectural details requested by the Department. Two plan sets have been provided, one set 'for information' to show the changes between the original submission and the current proposal, and a second clean plan set to be referenced as part of a development consent.

2.10 Ecological Sustainable Development

2.10.1 Issue

The Department has recommended that the concept proposal commit to achieving a minimum standard (e.g. 4 star Green Star rating) across the site.

2.10.2 Proponent's Response

HammondCare is committed to promoting environmental sustainability and has recently prepared their first Sustainability Strategy which includes the following development related objectives:

- Increase renewable energy to 20% of total energy used;
- Reduce water consumption per m² by 10% compared to existing operations; and
- Increase the diversion of waste from landfill by 20% compared to existing operations.

Whilst HammondCare is committed to reducing the environmental impact of their developments, the Green Star rating system is not considered to be the most appropriate measure for HammondCare's operations. HammondCare's core objective is focused on patient care and the Green Star system can often inhibit the implementation of best-practice care methods. One example of this, is the need to provide climate control for residents through the use of air conditioning rather than natural ventilation to address heightened sensitivity caused by certain treatments. Also, mental health and dementia care outcomes are significantly influenced by the built environment including control of stimuli such as temperature, light, noise and smell - hence carers require a built environment which is flexible and customisable to the patient or residents personal needs.

Accordingly, HammondCare will endeavour to implement ESD initiatives at the detailed design stage to achieve an equivalent of 4 star Green Star rating, however it is requested that a condition of consent not be imposed requiring Green Star accreditation.

2.11 SEPP 33 – Hazardous and Offensive Development

2.11.1 Issue

The Department has requested that the application of SEPP 33 to the proposal be considered and that a preliminary risk screening be undertaken.

2.11.2 Proponent's Response

It is noted that the application is for Concept Plan approval only and relates to an existing hospital campus. As such the application will not disturb areas of the hospital used for potentially hazardous or offensive industry or storage and does not propose any new potentially hazardous or offensive uses that are not already on site. Therefore, the SEPP is not applicable to this stage of the development and is best addressed as part of any subsequent application for detailed design (if necessary).

2.12 Flooding

2.12.1 Issue

OEH has requested a preliminary flood study to determine if the site is affected by flooding or overland flow.

2.12.2 Proponent's Response

A Preliminary Flood Study has been prepared by Wood & Grieve Engineers (**Appendix Q**). 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.

2.13 Contamination

2.13.1 Issue

The Department has requested a Detailed Site Investigation be carried out to demonstrate the site is suitable for the residential use.

2.13.2 Proponent's Response

A Detailed Site Investigation has been undertaken by JK Environments (**Appendix R**) as requested by the Department. The investigation covers the area subject to the development and excludes the Pallister House lot. Works in this area, including the proposed respite care centre, will subject to further investigation as part of a subsequent application once an Aboriginal Heritage Management Plan is in place.

The investigation involved a review of previous desktop studies, borehole testing and groundwater sampling which identified:

- An abandoned UTS to the south of the hospital building;
- A small self-bunded diesel cube, generator and small capacity incinerator on the eastern side of the hospital building;
- THR (F2) concentration above the human health and ecological SAC;
- THR (F3) concentrations above the ecological SAC; and
- Groundwater with elevated copper concentrations above the ecological SAC for freshwater.

Based on the findings of this study, JK Environments recommend additional sampling around the areas of concern when the site becomes fully accessible (i.e. after demolition) and the subsequent development and implementation of a Remediation Action Plan (RAP). Subject to these recommendations, the report concludes that the site can be made suitable for the proposed development.

2.14 Community Consultation

2.14.1 Issue

The Department recommended that further engagement with the community be undertaken given the significant community interest in the proposal.

2.14.2 Proponent's Response

HammondCare has undertaken an extensive consultation programme with the community and government agencies throughout the preparation of this amended proposal. A Community Consultation Summary Report is included at **Appendix S** which provides an overview of the consultation undertaken to date and more recently, communication in response to individual submissions. Of note, since the public exhibition period finished, HammondCare has:

- Provided regular updates and responded to queries from the community;
- Undertaken dedicated engagement, including site visits, with government agencies, key community groups, neighbours and stakeholders;
- Created a new project page on HammondCare's website and responded to enquiries received through the website portal;

- Letterbox dropped community updated and notifications to more than 1,830 residents;
- Held a community drop-in event where information regarding the proposed key amendments to the Concept Plan was made available.

As outlined throughout this Response to Submissions Report, issues raised during the consultation have been considered by the design team and the proposed amendments to the Concept Plan have sought to reduce impacts where possible.

HammondCare is 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).

3.0 Proposed Amended Development

Since public exhibition of the proposal, amendments have been made to the proposed development. The changes include those made in response to some of the issues and comments raised by the Department, Council and the general public, along with other amendments made to strengthen and enhance the design of the proposal.

The following section presents a brief updated description (where relevant) of the modified development for which approval is sought. As evident by the description of refinements at **Section 3.1** and the revised environment assessment provided at **Section 4.0**, the proposed changes largely reduce the environmental impacts of the development and will deliver an improved design outcome. The key changes include (as illustrated at **Figure 10**):

- Deletion of the seniors living villas on St Vincents Road and reallocation of GFA across uses, including a new respite care facility;
- Amended building envelopes with an overall reduction in height and scale to the seniors living buildings;
- Reconfiguration of building envelopes to improve sightlines to Pallister House and improve tree canopy retention;
- Amended landscape design focused on enhancing the heritage setting of Pallister House and providing usable and accessible areas of open space for patients and residents;
- Increased tree retention and planting of additional vegetation to achieve a net increase to tree canopy cover; and
- Removal of the basement from the curtilage of Pallister House.



Figure 10 Overview of proposed changes

Source: HammondCare

3.1 Overview of Changes

Table 1 provided a description of the key amendments sought to the proposal as exhibited. A revised architectural plan set detailing the above changes has been prepared by Bickerton Masters (**Appendix A**) and revised Landscape Plans (**Appendix L**) by Taylor Brammer. To accompany the revised plan set, an updated Design Statement has been prepared which highlights and provides further explanation of the proposed key changes to the design. A copy of this statement is included at **Appendix N**.

Table 1 Summary of Key Design Changes

Location	Summary of key changes
General	<ul style="list-style-type: none"> Overall reduction in GFA (from 28,300m² to 27,500m²). Overall reduction in FSR (from 0.84:1 to 0.81:1). Overall increase to deep soil planting of 15% (from 12,000m² to 13,800m²). The floor space area of health services has been increased to be greater than the seniors living uses, from 13,900m² of health uses to 14,500m². Staging of the project has been changed so that health services uses are to be constructed prior to seniors living uses.
Hospital	<ul style="list-style-type: none"> Building footprints have been modified to reduce impacts on existing trees. The western end of the hospital building envelope has been reduced in scale, now being partially single storey and concealed beneath a landscaped terrace, to improve sightlines to Pallister House from River Road. The lower section of the Hospital now includes a 2-3 storey projecting built form intended to relate more strongly to the scale of Pallister House, reducing the visual impact of the floors above. The geometry of the south side of the hospital has been redesigned to have a significantly stronger relationship and visual connection to that of Pallister House and its Heritage Curtilage. The design and location of the Hospital has been modified to improve sightlines between Pallister House and River Road. The Hospital basement carpark footprint has been reconfigured to increase separation from Pallister House. The section of carpark within the Curtilage has been removed to allow for gentler grading and more planting within the landscape.
Seniors Living	<ul style="list-style-type: none"> Building footprints have been modified to reduce impact on existing trees. Overall bulk and scale of seniors living uses has been reduced through a reconfiguration and softening of the top floor levels. The southern seniors living building now steps down to provide a smaller and simpler backdrop to Pallister House. The northern seniors living building envelope has been reduced at its western end to step down to the neighbouring lower scale residential dwellings. Overall reduction in seniors living uses from 14,400m² as submitted to 13,000m².
Respite care facility	<ul style="list-style-type: none"> The three proposed seniors living villas (1,600m²) have been removed and replaced with a new respite care facility (700m²) that is located further away from the driveway and St Vincent's Road. Thus, there is no longer any development proposed in the part of the heritage curtilage south of the driveway onto St Vincent's Road, thereby improving sightlines to Pallister House.
Landscape	<ul style="list-style-type: none"> Retention of indigenous native mature planting to the boundary zones to soften the edges of the site and screen the building envelopes of the health campus beyond. A period garden around Pallister House to contribute to its heritage curtilage. Former bridle path will be interpreted as a pedestrian footpath that will run from River Road to St Vincent's Road, to provide public access through the heritage landscape of Pallister House.

4.0 Additional Information and Environmental Assessment

The exhibited EIS addressed the potential impacts of the overall development against a range of matters relevant to the development. Except where addressed in this report, the conclusions of the original assessment remain unchanged.

It is noted that the proposed amendments improve the scheme and that the overall scope of the proposal has been reduced. Accordingly, the environmental impact of the project will be reduced, particularly in relation to matters such as bulk and scale, visual impacts, privacy and tree canopy retention.

4.1 Consistency with Original SSDA Scheme

The objectives of the proposal remain consistent as the original design and the revised design reduces the overall environmental impacts.

4.2 Built Form and Urban Design

An updated Architectural Design Statement has been prepared by Bickerton Masters (**Appendix N**) in support of the amended scheme. As discussed at **Section 2.2** above, and demonstrated by the revised design statement, the amended Concept Plan enhances the built form of the development and results in significantly reduced impacts when compared to the original proposal. Design Guidelines (**Appendix O**) have also been developed to ensure the key principles of the Concept Plan are reflected in the detailed design of the health campus.

Accordingly, the amended scheme is considered to improve the built form and urban design outcome of the site which will be further assessed as part of a subsequent detailed design application.

4.3 Aboriginal Heritage

As outlined at **Section 2.4** above, subsurface archaeological testing along the eastern side of the site, where there is Aboriginal archaeological potential, will be undertaken prior to any ground works. Accordingly, the Concept Plan will not disturb any items of Aboriginal significance.

4.4 Heritage

A Heritage Impact Statement has been prepared by NBRS (**Appendix I**) which addresses the amended Concept Plan proposal. The assessment concludes that the amended Concept Plan will have a positive heritage impact on the setting and appreciation of the significance of Pallister house.

As noted at **Section 2.3** above, substantial design amendments to the Concept Plan are proposed to respond to concerns raised by OEH in their submission. The project has not yet progressed to the detailed design phase, however, HammondCare is committed to achieving a positive heritage outcome in relation to Pallister House and will continue to consult with OEH throughout the detailed design phase to ensure that this objective is achieved.

4.5 Landscape Design and Tree Removal

A revised Concept Landscape Plan has been prepared by Taylor Brammer (**Appendix L**) and a corresponding Arborist Report has been prepared by Redgum Horticultural (**Appendix F**). As discussed at **Sections 2.6** and **2.7** above, the amended Concept Plan will result in significant improvements to the landscape design of the site, including increasing the tree canopy cover and enhancing the landscaped setting of Palliser House. Further assessment of landscaping and tree removal will be undertaken as part of a subsequent detailed design application.

4.6 Contamination

As outlined at **Section 2.13**, above the Detailed Site Investigation undertaken by JK Environments (**Appendix R**) concludes that the site can be made suitable for the proposed development subject to the preparation of a RAP once the site becomes fully accessible. It is therefore proposed that this requirement form a condition of consent on the Concept Plan.

5.0 Final Mitigation Measures

The collective measures required to mitigate the impacts associated with the proposed works are detailed in **Table 2** below. These measures replace those outlined in the original EIS.

Table 2 Final Mitigation Measures

Mitigation Measures
<u>Design</u> <ul style="list-style-type: none"> Develop the detailed design of the development in accordance with the principles of the Design Guidelines prepared by Bickerton Masters (September 2019) and the principles of SEPP 65 and the ADG where applicable.
<u>Tree Canopy</u> <ul style="list-style-type: none"> Retain and protect the trees identified for retention and implement the recommendations of the Arborist Report prepared by Redgum Horticultural (September 2019).
<u>Biodiversity</u> <ul style="list-style-type: none"> Minimise the disturbance of threatened ecological communities during the detailed design phase and acquire offsets in accordance with the BDAR undertaken by Ecological Australia (September 2019) where impacts are unavoidable.
<u>Sustainability</u> <ul style="list-style-type: none"> Implement HammondCare's Sustainability Strategy as part of the design and ongoing operation of the health campus.
<u>Accessibility</u> <ul style="list-style-type: none"> Ensure accessible access is provided to all buildings, services and public transport within and around the site. Maximise accessibility through the landscape design where topography permits.
<u>Heritage/Archaeology</u> <ul style="list-style-type: none"> Undertake physical investigations of Aboriginal and European Archaeology prior to any ground disturbance in the nominated areas in accordance with the recommendations of the Archaeological Assessment dated March 2018 and Aboriginal Cultural Heritage Assessment dated December 2018). Ensure careful consideration of Pallister House at the detailed design phase of the development and implement the strategies contained within the Design Guidelines (September 2019) and Landscape Concept Plan (September 2019) to enhance the setting of the building. Avoid the heritage curtilage of Pallister House for any basement works.
<u>Bushfire</u> <ul style="list-style-type: none"> Adopt the recommendations of the bushfire hazard assessment prepared by Building Code & Bushfire Hazard Solutions (March 2018)
<u>Contamination</u> <ul style="list-style-type: none"> Undertake all necessary assessments and remedial actions recommended in the JKEnvironment's report dated September 2019.
<u>Hazardous and offensive development</u> <ul style="list-style-type: none"> Further consider SEPP 33- Hazardous and Offensive Development as part of the detailed design SSDA.
<u>Acoustic and Vibration</u> <ul style="list-style-type: none"> Implement the recommendations of the Acoustic and Vibration Study prepared by Acoustic Logic (dated August 2018), including undertaking a detailed acoustic review of mechanical plant.

6.0 Conclusion

HammondCare and its specialist consultant team have considered all submissions made in relation to the public exhibition of SSD 8699. A considered response to all submissions has been provided within this Response to Submissions Report and the accompanying documentation.

In responding and addressing the range of matters raised by the Government agencies and authorities, the proposed works have been refined. The changes proposed to the works largely address concerns raised within the submissions or result from opportunities to improve the scheme. The amendments do not result in any new environmental impacts relative to surrounding sites or the wider community.

The amended Concept Plan has significant planning merits as it:

- Is consistent with the aims and objectives of the Special Infrastructure zone of the Lane Cove LEP 2009 as well as SEPP Seniors and other relevant State Environmental Planning Policies;
- Has carefully considered all issues raised during the exhibition period, as well as subsequent consultation undertaken by HammondCare, and substantial amendments have been made to:
 - Reduce the overall bulk and scale of the development;
 - Provide a more sensitive transition in built form to surrounding land uses;
 - Develop a new landscape concept which focuses on protecting existing significant vegetation and improving the heritage curtilage of Pallister House;
 - Reduce the biodiversity impacts and improve existing canopy cover by minimising the number of trees to be removed and planting compensatory vegetation;
 - Create new sightlines to Pallister House from River Road and improve the overall heritage outcome for the significant building;
- Includes changes to the allocation of uses at the site and staging of the development in response to community concerns;
- Will respond to increasing demand for specialist care for the elderly in northern Sydney and will remove pressure on the public health system;
- Provides access to a wide range of integrated care and support services that will provide the opportunity for residents to remain living within their community;
- Is based on supporting technical studies which confirm that the environmental impacts associated with the proposal are generally positive and will not give rise to any significant, adverse impacts;
- Will be subject to a subsequent detailed design process, including further community and stakeholder consultation, to refine the scheme and ensure a high quality and functional health campus is delivered; and
- Is suitable for the site and is in the public interest.

We trust that the information provided satisfies the requirements of the additional information request. We look forward to the Department progressing the assessment of the application and to receiving a set of draft conditions for consideration in due course.