



Ms Katie Formston
Head of Design - Property and Capital Works
HammondCare
Level 4, 207B Pacific Highway
St Leonards NSW 2065

20 April 2020

Dear Ms Formston

**Redevelopment of Greenwich Hospital (Concept) (SSD-8699)
Response to Submissions**

Further to the Department's letter dated 20 December 2019, a comprehensive review of the amended proposal has now been completed by Department officers and the Department has identified additional matters outlined in **Attachment 1** that require your consideration and response.

The Department requires that you provide a response to the issues raised in **Attachment 1** when you respond to the Department's letter dated 20 December 2019.

If you have any questions, please contact Megan Fu, who can be contacted on 02 9274 6531 or Megan.Fu@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink that reads 'David Gibson'.

David Gibson
Team Leader
Social Infrastructure

ATTACHMENT 1

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

Clause 27 Bushfire prone land

Clause 27(2) requires consideration of the general location of the proposed development, the means of access to and egress from the general location and other relevant matters. The Department requests that the Applicant considers and provides a response to these matters.

Clause 29 Consent Authority to Consider Certain Site Compatibility Criteria

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

Clause 25(5)(b)(iii) relates to adequacy of services and infrastructure and was not specifically addressed in the Response to Submissions Report. The Department considers that the adequacy of services and infrastructure must be addressed in light of the cumulative development of housing covered by the SEPP.

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

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

Clause 33 Neighbourhood Amenity and Streetscape

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

The Department maintains that proposed seniors living apartments (as amended) are considered inconsistent with the desirable elements of the location's current character and would not contribute to the quality and identify of the area. Further, the proposed development would not complement and sensitively harmonise with the heritage listed Pallister House. Further amendments are required to ensure that the development has building heights compatible in scale with adjacent development and the landscaped setting is retained along the frontage of the site, including retention of the significant Tree 167.

Clause 50 Standards That Cannot Be Used to Refuse Development Consent

The RtS asserts that the 70 per cent of dwellings will receive three hours of direct sunlight mid-winter due to the siting and location of the proposed buildings. The details of the solar access modelling that is identified in the RtS must be provided to demonstrate how solar access would be achieved.

2. State Environmental Planning Policy 65 (Design Quality of Residential Apartment Development) (SEPP 65)

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

Further amendments are required to ensure that the development has building heights compatible in scale with adjacent development and buildings retained on the site, and the landscaped setting is retained.

3. Traffic Impacts

The Department notes that the cumulative impacts from recent and proposed developments have not been assessed in the Traffic and Parking Impact Assessment. The Department requests that these cumulative impacts and an updated assessment is provided.