



18 February 2021

Our Ref: SU7340
SSD: 13619238

Ms Megan Fu,
Principal Planner, Social and Infrastructure Assessments
Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Ms Fu,

Secretary's Environmental Assessment Requirements (SEARS) for Greenwich Hospital Redevelopment at 97-115 River Road Greenwich

Thank you for the opportunity to comment as part of the request for the Planning Secretary's environmental assessment requirements (SEARS) for the redevelopment of the Greenwich Hospital. I refer to the above and advise Council has considered the submitted documentation.

The proposal includes the demolition of the existing hospital building and associated facilities, construction of a new hospital facility, two additional assisted independent living buildings (Seniors Living), a new respite care building, associated facilities and services, basement carparking, vehicular access, and landscaping.

On 10 November 2020, the concept proposal (SSD-8699) for the redevelopment of the Greenwich Hospital was recommended for approval by the Independent Planning Commission (IPC). The Commission and the Department considered that the proposed Seniors Living component to be strategically justified and could be supported.

Despite the recommendation, under Lane Cove Council's Local Environmental Plan 2009, the land is zoned for *Health Service Facilities (SP2)* and the proposed Seniors Living component which but for the provision of the SEPP, is not permissible. Seniors Living does not meet the objectives of the SP2 zone. Therefore, Council maintains its original position that the proposed Seniors Living Buildings are not supported.

In light of the future detailed design being submitted to the Department for assessment, Council requests that the applicant consider the inclusion of the following information as part of the Environmental Impact Statement (EIS):

- Heritage: Heritage Impact Statement: To assess that the redevelopment will not compromise the heritage fabric of the Pallister House and associated curtilage;
- Stormwater Management Plan: It is recommended that the applicant consider how the proposed development will impact stormwater and overland flows and should incorporate Water Sensitive Design. A comprehensive stormwater and drainage plan,

and details of any Onsite Stormwater Detention (OSD) should be submitted with the future development proposal;

- Traffic and Parking Report: To address traffic and parking impacts during construction and operation. Vehicle movement should be separated and defined between uses (residential/deliveries/staff etc) to improve safety and amenity of the site;
- Remediation Action Plan/ Stage 2 Contamination Report: Is required to assess localised risks associated with total recoverable hydrocarbons (TRH) in the soil and residual contamination associated with the underground storage tank identified in the Detailed Site Investigation (DSI);
- Arborist Report: A comprehensive arborist report is required to be submitted. Any trees removed should be replaced at a minimum ratio of 2:1;
- Biodiversity Report: In particular to address the woodland area at the eastern end of the site and impacts on flora/fauna/habitat due to the encroachment of the proposed respite clinic;
- Access Report: The report should confirm that the development can provide appropriate accessibility for the project and would satisfy Clause 26 of the SEPP (Housing for seniors or people with a disability) 2004;
- Landscaping: A comprehensive Landscaping Plan should be submitted with full species listing;
- Section 7.11 Development Contribution: A development contribution will be required to be paid to Lane Cove Council for the Seniors Living component. The contribution amount will be calculated according to the total increase in residential population. The contribution requirement will be included as a recommended condition in Council's submission for the future development proposal;
- Lane Cove LEP 2009 and Lane Cove DCP 2010: Under clause 11 in the SEPP (State & Regional Development) 2011, the Lane Cove DCP 2010 does not strictly apply to the state significant development proposal. Regardless of the SEPP, Council requests that the EIS include a full assessment against the relevant sections of both the LEP and the DCP for review;
- Erosion and Sediment Control Plan;
- Waste Management Plan;
- Hydrological Survey; and
- Traffic Noise Report.

Council would request that the above assessment requirements be considered for inclusion in the SEARs for the detailed development proposal at the Greenwich Hospital.

Sincere regards

A handwritten signature in blue ink that reads "Chris Shortt". The signature is written in a cursive, flowing style.

Chris Shortt

Planner

Lane Cove Council