

St John of God Richmond Hospital Redevelopment SSD-10394

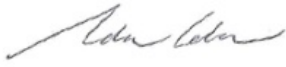
Response to Submissions Report

On behalf of
St John of God Health Care
June 2021



Project Director

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Signed*

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This document is for discussion purposes only unless signed and dated by the persons identified. This document has been reviewed by the Project Director.

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Appendices

Appendix 1: Additional 3D renders

Appendix 2: Updated architectural plans

Appendix 3a: Updated construction noise management plan

Appendix 3b: Letter from acoustic consultant

Appendix 4: Updated clause 4.6 variation request

Appendix 5: GFA plans

Appendix 6: Updated landscape plans

Appendix 7a: Updated bushfire report

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Appendix 8: Historical archaeological assessment

1 Introduction

This Response to Submissions (RtS) Report has been prepared by Mecone NSW on behalf of St John of God Health Care (the applicant) to respond to the submissions received during public exhibition of the environmental impact statement (EIS) for the proposed St John of God Richmond State significant development (SSD-10394). This report also describes minor design changes made to the development in response to submissions and as a result of design development.

The EIS was exhibited from 15 January 2021 to 19 February 2021. A total of 15 submissions were received including:

- 12 submissions from public authorities.
- 2 submissions from organisations.
- 1 submission from a member of the public.

The applicant's responses to the submissions are provided in the sections below.

2 Amended design

Updated plans are being submitted as part of this RtS report (see **Appendix 2**). A number of minor changes are proposed in response to submissions received during the exhibition period and as a result of ongoing design development. These changes are described in the table below. The changes are outlined in red in the amended drawings.

Table 1. Proposed changes to the development

Description of change	Reason for change
The Wellness Centre has been rotated and set back an additional 4m from the property boundary (from 6m to 10m).	This change is being made in response to consultation with NSW Rural Fire Service (RFS) (see further detail at Section 3.5 of this RtS).
The existing switch room is to be retained.	The design team has concluded through design development that the existing switch room is critical for maintaining and running the infrastructure of the whole site and therefore needs to be retained.
The plant areas between the residential pavilions are to be enclosed with louvred screens	This change is being made to satisfy bushfire mitigation requirements.
Additional plant area to the roof of the southern portion of the Garden Pavilion.	This change is being made in response to design development. The height of the plant area will remain lower than highest point of Garden Pavilion roof.
Stair reconfiguration and additional lobby and toilet to the ground floor of St Pauls Annex.	The stairs require reconfiguring to assist in the level difference once surrounding buildings are to be removed. Additional toilets are required for BCA requirements for toilet facilities to the building.

3 Response to public authorities

3.1 DPIE—Planning

The table below provides a response to the issues raised in DPIE's letter dated 24 February 2021.

Table 2. Response to DPIE—Planning	
Issue	Response
landscape plans are to be provided detailing the species, number and location of final plantings, specifically the replacement planting of 30 trees. Consideration should be given to tree locations to assist in the screening of new buildings, helping them blend into the surrounds.	Updated landscape plans with the requested detail are attached at Appendix 6 of this RtS.
noise issues: noise monitoring at neighbouring residences in accordance with the Noise Policy for Industry is to be undertaken to accurately identify the existing acoustic environment confirming that the development will not result in unreasonable acoustic impacts for construction and operation.	<p>The requested noise monitoring has not been carried out due to difficulties in arranging access to the neighbouring property.</p> <p>Given the lack of additional noise monitoring, it is proposed to base the noise criteria for operation and construction activities on a 30dB(A) background noise level (consistent with the minimum recommended by the Noise Policy for Industry). A letter by the project acoustic consultant explaining the approach is attached at Appendix 3b of this RtS.</p> <p>It is requested that any further acoustic reporting be required as a condition of consent.</p>
details of noise logger 1 and 3 are to be provided to clarify the existing background noise levels at these locations.	Details of the noise loggers are provided in the updated acoustic report at Appendix 3a of this RtS.
the noise management level is to be amended to be only 10dB above the background noise level for residential accommodation.	The noise management levels have been amended in the updated acoustic report at Appendix 3a of this RtS.
Table 11, 12 and 13 of the construction noise report are to demonstrate the receiver locations as their positions on the subject site are unclear.	The tables have been amended improve clarity in the updated acoustic report at Appendix 3a of this RtS.

Table 2. Response to DPIE—Planning

Issue	Response
consideration should be given to providing openable windows within communal areas to provide natural ventilation and cooling, rather than the use of mechanical air conditioning at all times.	<p>The large doors in the café and dining communal areas can be opened fully for natural ventilation, as indicated on the elevation drawings.</p> <p>However, openable windows in the residential pavilions or residential communal areas are not to be provided given bushfire risk and patient anti-ligature measures. Openable windows would have to be closely monitored by staff, and this would impose an unfeasible operational burden on the hospital.</p>
the clause 4.6 variation (Appendix 14) is to be amended to appropriately reference the height variation being sought (not FSR), and the height of existing structures is also to be provided for comparison purposes.	<p>The clause 4.6 variation has been updated as requested (see Appendix 4).</p> <p>In addition to providing the requested information, the “unreasonable or unnecessary” discussion has been expanded to include further discussion regarding heritage.</p>
consideration should be given to whether an updated Emergency Response Plan is required that accounts for the proposed increase in patient capacity at the facility, with particular attention given to flood evacuation procedures and practices.	<p>The emergency response plan can be updated as a condition of consent (prior to occupation certificate) to reflect the redevelopment. That said, the existing general procedures are generally suitable for the redeveloped hospital, with no significant changes required.</p> <p>It is also noted that the plan undergoes regular review, with the next review period in January 2023.</p>

3.2 DPIE—Water

Table 3. Response to DPIE—Water

Issue	Response
<p>The site is currently serviced by electricity, water, sewer and gas. The EIS states existing water, sewer and gas connections will be adequate for servicing the proposal. There is unlikely to be a requirement for accessing water from surface water or groundwater sources during construction and operation.</p> <p>However, if there were to be any water take from groundwater or</p>	<p>Noted. An application for a Water Access Licence would be made and a water supply work approval obtained for any water taken from groundwater or surface water sources.</p>

Table 3. Response to DPIE—Water	
Issue	Response
surface water sources, prior to the take an application for a Water Access Licence and a water supply work approval would be required unless the project falls under exemptions listed in the Water Management (General) Regulation 2018.	

3.3 DPIE—Biodiversity and Conservation

Table 4. Response to DPIE—Biodiversity and Conservation	
Issue	Response
<p><i>Biodiversity</i></p> <p>EES advises that there are no further requirements or comments regarding Biodiversity.</p> <p><i>Flooding</i></p> <p>EES advises that there are no further requirements or comments regarding flooding.</p>	<p>Noted. We understand no action is required.</p>

3.4 Hawkesbury City Council

Table 5. Response to DPIE—Biodiversity and Conservation	
Issue	Response
<p>Properties associated with the proposal</p> <p>Any approval is to clearly identify works that are required to occur on adjacent properties for access, stormwater, drainage, landscaping and bushfire asset protection zones.</p> <p>This is to be clearly shown on a plan associated with the proposal and identify the location of services required to be used, upgraded or constructed to support the proposal.</p> <p>This plan should identify existing and or proposed easements. Works on adjacent properties are required to</p>	<p>The proposal does not seek approval for any works on adjoining properties, whether access, drainage, landscaping or asset protection zones (APZs), and therefore the requested plan is not necessary. Stormwater will be piped to the Hawkesbury River via the existing easement in favour of the hospital.</p> <p>In its discussion of required bushfire attack levels (BALs) and required construction materials, the originally submitted bushfire report (Blackash, 12 November 2020) provides the option of an APZ easement on the adjoining property. This option, however, is not being pursued by the applicant. Refer to further discussion at Section 3.5 of this RtS.</p>

Table 5. Response to DPIE—Biodiversity and Conservation

Issue	Response
<p>be accompanied by appropriate owners consent.</p>	
<p>Heritage Impact</p> <p>Clause 5.10 of Hawkesbury LEP 2012 states that the consent authority must consider the effect of the proposed development on the heritage significance of the item or area concerned. The heritage assessment documents have been reviewed and it is considered that a Conservation Plan (as per NSW Heritage guidelines) should be prepared due to the considerable alterations proposed to the site.</p> <p>Given that there is no existing contemporary Conservation Plans for the site a new Conservation Management Plan (CMP) needs to be developed for the site.</p> <p>A new CMP would be expected to update the history of the site including indigenous, European and the more recent Church's history and assess the site fabric in detail to provide levels of heritage significance to all parts of the site including buildings, structures, landscaping and archaeology.</p> <p>This CMP is to be submitted to Council so that there is an overall understanding of the potential impacts the proposal would have on the heritage significance of this heritage item.</p> <p>Then, a revised Heritage Impact Statement is to be prepared outlining the range of options that the applicant has reviewed or what options the applicant should investigate and then in detail outline why the chosen option is one that has the least heritage impact.</p> <p>The updated HIS should outline any ameliorating recommendations and provide the following:</p> <ul style="list-style-type: none"> - A detailed room by room etc Schedule of Works re proposed 	<p>It is considered that a CMP and revised HIS are not necessary. While considerable works are proposed on the lot, only minor works are proposed to the heritage fabric of Belmont House, namely:</p> <ul style="list-style-type: none"> • Making good of the points of connection where non-heritage buildings are proposed to be detached from Belmont House. • Minor refurbishment of three interior rooms. <p>The primary works, including demolition of non-heritage buildings and construction of new buildings, will improve the significance of Belmont House by decluttering the built form around the house and allowing the house to be viewed as originally intended. This is confirmed in the heritage impact statement at Appendix 6 of the EIS.</p> <p>It is further noted that the submission from Heritage NSW does not recommend a CMP. Heritage NSW instead notes that the statement of significance and evaluation in the heritage report follow relevant guidelines and meet the relevant SEARs requirement.</p> <p>Given the above, we believe preparation and implementation of an CMP would be an excessive measure that would impose unnecessary and unreasonable costs on the applicant.</p>

Table 5. Response to DPIE—Biodiversity and Conservation

Issue	Response
restoration works to the historic Belmont House, - The possible archaeological implication both on European and Indigenous values, and - The need for an Archival Recording of the current state of the overall site and buildings especially those structures, buildings and landscape area that will be much altered or removed. The Archival recording is to be to NSW Heritage Office standards.	
Performance, Damage and Defects Bond A performance, damage and defects bond must be lodged with Council prior to the commencement of any works or issue of a Construction Certificate. The bond is to cover any restoration required to Council's roads resulting from deterioration caused by construction traffic.	Noted. It is understood this will form a condition of consent.

3.5 Rural Fire Service

A meeting was held between the applicant and RFS on 22 April 2021 to discuss the issues raised in RFS's submission. An updated Bushfire Hazard Assessment (Blackash, 4 May 2021) has been prepared following the meeting (see **Appendix 7a**). Key updates include:

- The Wellness Centre has been further set back from the boundary (6m to 10m) to get the building out of the flame zone. Due to site constraints, the building cannot be moved to another location.
- As requested by RFS, a performance-based assessment for the Wellness Centre has been carried out (see calculations at Attachment 5 of the updated bushfire report).
- It has been clarified that a radiant heat exposure of 10kW/m² will not be experienced by occupants as the building will be closed and not occupied in the event of grass fire. This will be enforced via the Emergency Management and Evacuation Plan.

Direct responses to the issues raised in RFS's original submission letter dated 23 March 2021 are provided in the table below.

Additionally, the project bushfire consultant has prepared a letter in response to DPIE's comments on the updated bushfire report in its letter dated 19 May 2021 (refer to **Appendix 7b**).

Table 6. Response to RFS

Issue	Response
Provide additional information to demonstrate that the proposed new buildings i.e. the Wellness Centre; Residence Pavilions and Garden Pavilions can achieve asset protection zone (APZ) requirement as per Table A1.12.1 of Planning for Bush Fire Protection 2019.	<p>The hospital is existing and the redeveloped Residence Pavilions and Garden Pavilions are infill Special Fire Protection Purpose (SFPP) development. As an existing SFPP development, the proposal is classified as infill SFPP development, and as such, Table A1.12.1 of PBP is not applicable.</p> <p>PBP states that the intention for any building work occurring within an existing SFPP development is to achieve a better bushfire outcome than if the development did not proceed. With this in mind, the construction of the redeveloped buildings will be undertaken in accordance with the Australian Standard for Construction of Buildings in Bushfire Prone Areas (AS3959).</p> <p>The applicant proposes to proceed with "Option 1" as discussed in section 9.6 of the original Bushfire Hazard Assessment at Appendix 7 of the EIS, which requires no easement on the adjoining property. This has been clarified in the updated bushfire report.</p> <p>Also, as noted above, it has been clarified that a radiant heat exposure of 10kW/m² will not be experienced by occupants of the Wellness Centre as the building will be closed and not occupied in the event of grass fire. This will be enforced via the Emergency Management and Evacuation Plan.</p> <p>Overall, the proposed buildings meet the requirements of PBP with no off-site APZ requirement.</p>
Provide information on management of existing vegetation along the southeastern site boundary for consideration as an APZ due to the low bush fire risk posed by the vegetation.	<p>The original bushfire report at Appendix 7 of the EIS provides information (including photographs) demonstrating that the existing vegetation along the southeastern site boundary is, and will continue to be, managed as an APZ.</p> <p>If required, the applicant can provide a VMP that outlines the management regimen within the site.</p>
Provide information to demonstrate that the existing building Belmont House can be upgraded for ember	Only basic ember protection is proposed for Belmont House. The heritage building does not form a notable component of

Table 6. Response to RFS	
Issue	Response
protection considering the heritage significance of the building.	the application, with no structural changes or additions proposed. Accordingly, it is considered that a separate heritage report is unnecessary.

3.6 Sydney Water

Table 7. Response to Sydney Water	
Issue	Response
Sydney Water has no objection to the development, however, we request that the proponent lodges a Feasibility study with Sydney Water for the proposed development. The proponent should contact a Water Servicing Coordinator to lodge this study on their behalf.	Noted.
Any potential upsizing of our local assets or limitations in our system will be defined within the Feasibility process.	Noted.
This advice is not formal approval of our servicing requirements. Detailed requirements, including any potential extensions or amplifications, will be provided once the development is referred to Sydney Water for a Section 73 application. More information about the Section 73 application process is available on our web page in the Land Development Manual.	Noted.

3.7 Water NSW

Table 8. Response to Water NSW	
Issue	Response
Due to the nature and location of the proposal, WaterNSW does not have any comments or particular requirements.	Noted.

3.8 Environment Protection Authority

Table 9. Response to EPA	
Issue	Response
Based on the information provided, the proposal does not appear to require an environment protection licence under the Protection of the Environment Operations Act 1997. Furthermore, the EPA understands that the proposal is not being undertaken by or on behalf of a NSW Public Authority nor are the proposed activities other activities for which the EPA is the appropriate regulatory authority. In view of these factors, the EPA has no comments to provide on this project and no follow-up consultation is required.	Noted.
While the EPA does not have regulatory involvement in the projects, we recommend that the Environmental Impact Statement (EIS) should address the following: Waste management – The EIS should estimate volumes of waste generated on the site and identify waste streams and disposal options for all waste including liquid waste, wastes classified as hazardous and wastes containing radiation. Waste management should consider the prevention of pollution, minimising resource use, improving the recovery of materials from the waste stream and ensuring the appropriate disposal of waste.	The proposal's volumes of waste, waste streams and waste disposal are detailed in the originally submitted operational waste management plan at Appendix 16 of the EIS. We understand no further information is required on this item.

3.9 Heritage NSW—Heritage Council of NSW

Table 10. Response to Heritage NSW—Heritage Council of NSW	
Issue	Response
Historic Heritage: The statement of significance and evaluation of heritage impacts on the values of the site contained in the Heritage Impact Statement by Weir Phillips Heritage & Planning are	Noted.

Table 10. Response to Heritage NSW—Heritage Council of NSW

Issue	Response
<p>concise and follow the guidelines in the NSW Heritage Manual 2001, Heritage NSW is satisfied with Statement of Significance outlined in <i>4.7 Discussion and Revised Statement of Significance</i> and the assessment of the impact on the heritage significance of the heritage items under <i>7 Effect Of Works On The Subject Site</i> in the Heritage Impact Statement by Weir Phillips Heritage & Planning, which meets the SEARs request.</p>	
<p>Historical Archaeology:</p> <p>It is noted that the EIS does not contain an archaeological assessment despite the requirement for it to be addressed in the SEARs. It is considered that the site may have high archaeological potential to contain the main house and associated structures known as Belmont Park and associated with Archibald Bell. Archaeological information associated with the large-scale estate may be of State heritage significance and requires conservation driven consideration prior to the approval of the project. It is recommended and archaeological assessment is completed as soon as possible to ensure this potential archaeological resource is appropriately managed.</p> <ul style="list-style-type: none"> • The archaeological assessment should be in accordance with HNSW guidelines and be completed by a suitably qualified historical archaeologist. This assessment should identify whether relics of local or state significance may be harmed by this activity and whether appropriate mitigation measures or alteration of the design should occur based on the significance of the relics which may be present. • Recommended conditions of consent for archaeology: 	<p>A Historical Archeological Assessment (HAA) prepared by Biosis is attached at Appendix 8. The assessment demonstrates that the majority of the works area has low archaeological potential and recommends that works can proceed with caution in the areas of low potential.</p> <p>Recommendations are also provided for works that may encroach slightly into areas of moderate potential, including preparation of a statement of heritage impact (SoHI). Given the minor nature of the potential encroachments, it is requested that the recommended SoHI be required as a condition of consent.</p> <p>Overall, it is considered that the HAA provides sufficient information to enable a planning determination of the application. Any potential minor impacts on the areas of moderate potential can be effectively mitigated via condition of consent.</p>

Table 10. Response to Heritage NSW—Heritage Council of NSW

Issue	Response
<ul style="list-style-type: none"> The Applicant shall submit an archaeological assessment prepared by a suitably qualified and experienced historical archaeologist. This assessment should identify whether relics of local or state significance may be harmed by this activity and whether appropriate mitigation measures or alteration of the design should occur based on the significance of the relics which may be present. 	

3.10 Heritage NSW—Aboriginal cultural heritage

Table 11. Response to Heritage NSW—Aboriginal cultural heritage

Issue	Response
<p><i>Biodiversity</i></p> <p>EES advises that there are no further requirements or comments regarding Biodiversity.</p> <p><i>Flooding</i></p> <p>EES advises that there are no further requirements or comments regarding flooding.</p>	Noted.

3.11 Transport for NSW/Roads and Maritime Services

Table 12. Response to TfNSW/RMS

Issue	Response
<p>1. It is requested that prior to the issue of first Occupation Certificate, the applicant be conditioned to submit the final Green Travel Plan (GTP) to TfNSW at development.sco@transport.nsw.gov.au for endorsement with consultation with TfNSW. The final GTP should include:</p>	<p>The applicant accepts the recommended condition of consent.</p>

Table 12. Response to TfNSW/RMS	
Issue	Response
<ul style="list-style-type: none"> Details of shuttle service for staff and/or patients and visitor to/from Richmond station; Analysis of residential postcode data for existing staff and a breakdown of shift patterns; A Travel Access Guide (TAG) for staff, patients and visitors, detailing the sustainable arrangements available for all cohorts. 	
2. TfNSW does not support the proposed convex mirror at the Grose Vale Road at the existing Hospital access, due to the mirror showing misleading sight distance for oncoming vehicles. TfNSW notes that convex mirror is only appropriate for local roads with low traffic and speed environment.	The applicant acknowledges TfNSW's concern and hereby removes the proposed convex mirror from the application.

3.12 Crown Lands

Table 13. Response to TfNSW/RMS	
Issue	Response
Crown Lands has no comments for this proposal.	Noted.

4 Response to organisations

4.1 Friends of Belmont House

Friends of Belmont House expressed support the proposal, noting that the “plans for the redevelopment of the site will ensure the preservation of the heritage significance of the site for future generations”. The applicant concurs with Friends of Belmont House and looks forward continued collaboration with the organisation in the future.

4.2 Endeavour Energy

Table 14. Response to Endeavour Energy	
Issue	Response
EIS	Consultation with Endeavour Energy has continued. The electrical design is

Table 14. Response to Endeavour Energy

Issue	Response
<p>As previously advised there appear to be no easements over the site benefitting Endeavour Energy. Given the critical nature and extensive upgrades required to the electrical infrastructure, appropriate easements need to be created to protect the assets and to assist in the ongoing easement management ie. without easements the possibility of encroachments and uncontrolled activities occurring increases and is more difficult to manage and rectify.</p>	<p>underway with Endeavour visiting site 16 April and the project team submitting the method of supply on 19 April.</p> <p>As the existing underground high voltage (HV) cable from the onsite HV pole to the existing transformer is an old paper lead type cable, this will need to be replaced, which will require and utilisation of the spare conduit to the transformer location.</p> <p>From the previous engagement with Endeavour, the project team have now been provided information that only the substation is required to be upgraded and no augmentation back to Grose Vale Road is required as per the original correspondence from Endeavour.</p>
<p>Electrical Services Infrastructure Management Plan</p> <p>In regard to padmount substation no. 3646, apart from the following extract of the Survey Plan, there appears to be no further detail provided making it difficult to determine the situation.</p> <p>[...]</p> <p>As a condition of the Development Application consent the Department should request the submission of documentary evidence from Endeavour Energy confirming that satisfactory arrangements have been made for the connection of electricity and the design requirements for the substation, prior to the release of the Construction Certificate / commencement of works.</p>	<p>See above.</p>
<p>Acoustics Report, Assessment of Operational Acoustic Impact</p> <p>The assessment of mechanical plant does not appear to consider the padmount substation. The report indicates an indicative assessment has been conducted for typical equipment and that once mechanical equipment has been finalised, an assessment will be conducted to deem required</p>	<p>The substation can be considered in detailed design acoustic assessment as requested.</p>

Table 14. Response to Endeavour Energy

Issue	Response
treatment. Accordingly the assessment should also take into the consideration the upgraded padmount substation required to facilitate the proposed development.	
<p>Bushfire Assessment Report</p> <p>Does not appear to provide an assessment of the existing or proposed electricity infrastructure required to facilitate the proposed development.</p>	<p>The upgrades to the padmount substation are not concerning from a bushfire risk perspective. The substation will remain in its current location, and no new transmission lines are proposed.</p> <p>It is noted that, in regards to electrical infrastructure, Planning for Bushfire Protection (PBP) only contains recommendations for placement of transmission lines. The proposal does not involve any new transmission lines, and therefore the proposal is not inconsistent with PBP.</p>

5 Response to public submissions

One submission from the public was received—an objection letter prepared by a planning consultant on behalf of the adjoining neighbour to the southwest. Direct responses to the issues raised in the letter are provided at Section 5.1 below.

The applicant conducted further consultation with the neighbour as part of preparation of this RfS, as described at Section 5.2 below.

5.1 Response to objection letter

The issues raised in the objection letter are addressed in the table below.

Table 15. Response to public submission

Issue	Response
<p>Revised Clause 4.6 Objection – the current Clause 4.6 Objection contains substantial errors and omissions that by any reasonable reading of the document render it unsupportable in its current form.</p>	<p>It is considered that the submitted clause 4.6 variation request is supportable with no “substantial” errors or omissions.</p> <p>An updated request has been prepared to correct minor errors and to include additional information requested by DPIE (see Appendix 4).</p>
<p>The Site Analysis image at Figure 3 of the Design Report is blurry. The RL of the closest current hospital building to our client's farm site is not legible.</p>	<p>It is acknowledged that some of the numbers in the site analysis image from the design report are blurry. The RLs, however, are not a critical component of this image. The RLs of all proposed buildings are</p>

Table 15. Response to public submission

Issue	Response
	clearly indicated on the actual architectural plans.
A similar blurry image is included as Figure 4 which has illegible RLs for proposed new buildings.	Figure 4 is a concept sketch only. It is intended to provide any final proposed layout or levels. The RLs of all proposed buildings are clearly indicated on the actual architectural plans.
The objection also incorrectly refers to FSR at one point, rather than height.	It is acknowledged that the submitted variation request mistakenly refers to FSR in the conclusion. An updated request has been prepared to rectify the error (see Appendix 4).
The DA's '10m height boundary plan' confirms a proposed maximum roof height of RL 73.77 – but this plan does not include any details to confirm the actual ground level under that RL73.77 nor any details to confirm the height of basement/subfloor areas and any fill or retaining walls that are additionally proposed in any particular location on the site.	The referred to diagram is intended to show the extent of the breach above the height plane, while the submitted site survey at Appendix 4 of the EIS shows existing levels.
Additionally, no visual analysis of the proposal from the Kavanagh's property (which includes three dwellings) plus extensive other farm infrastructure, has been undertaken despite this forming a clear component of the Department's SEARS requirements.	<p>To clarify, the relevant SEAR generally requires consideration of "potential impacts on the surrounding built environment and landscaping including views to and from the site and any adjoining heritage items". The SEAR does not require visual analysis specifically from the Kavanagh property.</p> <p>In accordance with the SEARs, a visual analysis is provided at Section 6.2.2 of the EIS. The analysis considers key views from the public domain, particularly views extending south, east and west across the site, which were considered the most important views in the vicinity.</p> <p>As part preparation of this RtS, additional view analysis from the nearest dwelling has been undertaken. Refer to Section 6 of this RtS for further discussion.</p>
The submitted Clause 4.6 Objection to the LEP 10m height control has failed to justify why the height non-compliance satisfies the relevant	The proposal's consistency with the zone objectives is provided on page 8 of the submitted clause 4.6 variation request.

Table 15. Response to public submission

Issue	Response
<p>zone objectives related to the height of buildings standard and it has failed to demonstrate that the height standard is irrelevant to the development. These are key deficiencies in the current application documentation.</p>	<p>Under clause 4.6 there is no requirement to demonstrate that the height standard is irrelevant to the development. Instead, in accordance with clause 4.6, the variation request has demonstrated that compliance with the height standard is unnecessary in the circumstances of this case.</p>
<p>The non-complying southern elevation of the redevelopment will present as a domineering form from the Kavanagh's property, due primarily to the proposed voluminous and high-pitched roof, combined with an elevated finished ground floor level for the four residential pavilions that will sit above natural ground level along a majority of the residential pavilion length.</p>	<p>The southern elevation will not present as a domineering form. The proposal is two storeys in height and features only a minor variation to the height control for only a portion of the roof.</p> <p>We emphasise that the nearest dwelling is some 300m from the hospital—a distance that more than adequately mitigates any potential visual impacts.</p>
<p>A reasonable reduction to the proposed pitched roof coupled with a drop in the ground floor level through additional minor site excavation at the higher end of the pavilions and a reduction on subfloor area could be agreed in order to achieve full and/or more substantial compliance with the LEP height control. These are all relatively modest changes that can be achieved without impacting on proposed hospital bed numbers, preferred internal floor to ceiling levels or the preferred floor plan and disabled access outcomes.</p>	<p>The proposed roof form is a deliberate choice made by the design team following extensive analysis of the site and surrounding area.</p> <p>It is noted that the design was presented to the Government Architect NSW through the State Design Review Panel (SDRP) process, and the SDRP supported the overall design of the proposal as a series of interconnected pavilion forms. No issues were raised with the height or roof pitch.</p> <p>Notably, the proposal includes a mix of cut and fill (not just fill) in the area of the pavilions. While portions of Residential Pavilions 3 and 4 will require fill, Residential Pavilions 1 and 2 will require cut of a similar scale. The overall effect will be consistent two-storey built form.</p>
<p>Setting the ground level closer to or just below natural ground level at the higher end of the southern part of the site would drop overall roof ridge heights considerably in this area, reduce the visual dominance of the new residential pavilions as viewed from the Kavanagh's farm but also internally, would reduce the height non-compliance and avoid the need for fill and/or large subfloor</p>	<p>As noted above, the proposal includes a mix of cut and fill (not just fill) in the area of the pavilions, and the overall effect will be consistent two-storey built form.</p>

Table 15. Response to public submission

Issue	Response
<p>areas and/or associated retaining walls on or near the southern boundary and excess building bulk.</p>	
<p>The Clause 4.6 objection states that the reason for the design's adoption of pitched roof forms is that "pitched roofs are traditionally associated with rural areas" (refer p.6). This is not a sufficient reason to pursue a non-compliance that has significant visual impacts on the immediate locality.</p>	<p>Additional reason for the non-compliance is included in the variation request—to wit, the sloping nature of the ground, combined with the operational need to maintain level access throughout the site, has resulted in the non-compliance. Furthermore, the variation request demonstrates that the non-compliance is acceptable from an environmental impact perspective and is consistent with the objectives of the zone and height standard.</p>
<p>It is not agreed that a steep pitched roof form is clearly preferable in the circumstances of this site redevelopment and the rural context. The elevated promontory location of the hospital site with four new extensive elevated pavilions ringing the entire southern perimeter is not the most suitable location for proposal of a substantial height non-compliance.</p>	<p>The proposed roof form is a deliberate choice made by the design team following extensive analysis of the site and surrounding area.</p> <p>The design was presented to the Government Architect NSW through the State Design Review Panel (SDRP) process, and the SDRP supported the overall design of the proposal as a series of interconnected pavilion forms. No issues were raised with the height or roof pitch.</p>
<p>In terms of the heritage impact of the proposed non-complying height for these residential pavilions it is considered that a reduction in overall pavilion height would also result in an improved outcome to protect the visual prominence of the Belmont House Roof. The current roof heights for the pavilions will sit well above the primary height of the Belmont House roof. This is not considered a desirable outcome even though the proposal does positively incorporate a wider curtilage/setback for buildings around Belmont House</p>	<p>The proposed strategy of providing two-storey form that is well set back from Belmont House provides an excellent outcome from a heritage perspective as confirmed in the submitted heritage report. In its discussion on impacts in section 7, the report states "The proposed new buildings have been carefully designed to be recessive to Belmont House in form, scale and material selection".</p>
<p>The Clause 4.6 Variation states that "the additional height does not result in any adverse visual impacts" however the variation request has failed to assess the visual impact of the non-compliance from the</p>	<p>It is maintained that the proposal does not result in any adverse visual impacts. Minor additional visible built form does not necessarily equate to an adverse impact. Further discussion on visual impacts from</p>

Table 15. Response to public submission

Issue	Response
<p>perspective of our clients being the closest rural neighbours (which property contains three dwellings) or the heritage conservation benefit to Belmont House of adopting a lower pavilion roof ridge.</p>	<p>the Kavanagh property is provided at Section 6 of this RfS.</p>
<p>The Clause 4.6 variation goes on to state “the additional height does not result in any adverse privacy impacts... the hospital does not overlook any sensitive uses being surrounded by rural grazing land.” This is an incorrect statement, as the Kavanagh’s farm contains three occupied dwellings and ongoing rural activities on site are sensitive, including the spraying of weeds, application of fertilisers, vegetation burning and periodic shooting of animals and vermin. It is expected that the current farming operation could well be viewed as an alien and undesirable land use that could potentially trigger a future land use conflicts, especially as the orientation of the redeveloped hospital is so outward focused.</p>	<p>Firstly, it is noted that the non-complying height is primarily limited to non-habitable roof space. That is, the non-complying height does not accommodate any additional built form within which occupants would overlook surrounding property.</p> <p>Secondly, the reference to “grazing land” in the clause 4.6 variation request refers to the immediate surrounding land. The nearest dwelling is approximately 300m from the proposed development, which is more than sufficient for ensuring a reasonable level of privacy.</p> <p>In regard to land use conflict, it is noted that the site has been operating as a mental health hospital for many years, and we are unaware of any significant conflict between the hospital and adjoining rural activities.</p>
<p>The proposed hospital redevelopment will also result in a further intensification of hospital site uses.</p>	<p>This point is acknowledged given it is one of the primary purposes of the application. The intensification will not, however, result in any unreasonable adverse impact on the surrounding environment, subject to the implementation of the mitigation measures identified in the EIS.</p>
<p>Whilst the nearest dwelling as mentioned in the Clause 4.6 objection is approximately 300m away, the Kavanagh’s have confirmed they are very concerned about the domineering new built form which wraps around the entire southern boundary of the site, the lack of landscaping, the noncomplying additional height (even though it is hard to be specific about the details given the lack of plan details (insufficient natural ground level and existing roof details in the lodged application)). They also</p>	<p>As discussed above, we do not consider the proposed form to be domineering. It is only two storeys with only a minor variation to the height control. Also, as discussed above, it is considered that the proposal does not result in any notable privacy impacts as the nearest dwelling is 300m away.</p>

Table 15. Response to public submission

Issue	Response
feel the proposal is designed to overlook them whereas the current form is much more considerate of them as neighbours, being to a land use positioned on the prominent adjacent hill.	
The proposed removal of established mature trees along the southern boundary will contribute to the high exposure of the non-complying height pavilion buildings.	Only one tree (tree no. 217) is proposed to be removed between the southwest boundary and the existing St Augustines and Monastery buildings, and only four trees (tree nos. 224, 225, 226 and 289) are proposed to be removed in the area between the current CTC Unit and Archives building, as identified in the tree retention and removal plan at Appendix 1 of the EIS. The vast majority of the site's trees, including those on the steep southern slope and in the heritage gardens, will be retained.
In the above ways the southern pavilions for the hospital redevelopment do not contribute positively to the rural character of the area and adjacent residential and rural land uses.	The proposal has been carefully designed and positioned to relate appropriately to the landscape and surrounding uses. The SDRP, in its review of the proposal prior to lodgment, supported the building design as it relates to the landscape, noting the "proposed new facilities located in the landscape as a series of connected pavilions" as a positive quality of the development.
In terms of the steeply pitched roof choice for these pavilions it has not been demonstrated why the alternative of a less steeply pitched roof or a modern flat or skillion roof form perhaps combined with a lower wall height could not be alternatively adopted for the new modern residential pavilions.	The proposed roof form is a deliberate choice made by the design team following extensive analysis of the site and surrounding area.
For all the above reasons the Clause 4.6 objection has not demonstrated that the additional height will result in a better planning outcome than a compliant height proposal. Compliance with the 10m LEP height standard is a reasonable requirement for the site, especially in respect of the southern pavilion buildings which are positioned at an	The additional height will provide for a more aesthetically pleasing form with a roof suited to the context and will also allow for level access throughout the site, which is important for hospital operations. The additional height is also part of a strategy to pull back detracting built form from the immediate curtilage of Belmont House and concentrate new built form in suitable location towards the southwest

Table 15. Response to public submission

Issue	Response
important interface between the adjacent rural and hospital uses of the subject site.	edge of the site, well set back from Belmont House.
2. An updated View Impact and Design Analysis that actually addresses the following SEARS requirement is needed – submission of a “view analysis, photomontages and architectural renders, including from public vantage points and a Design Report identifying the potential impacts on the surrounding built environment and adjoining heritage items.”	<p>A view impact analysis is included at Section 6.2.2 of the EIS, and 3D renders are included in the design report at Appendix 2 of the EIS. It is considered that this documentation adequately addresses the SEARs. Additional renders and discussion on views from the Kavanagh property are provided at Section 6 of this RtS.</p> <p>As noted in the EIS, a visual impact assessment by a specialist is considered unnecessary given there are no significant view corridors crossing the site (as identified in Council's planning documents), and the scale of the development is relatively low.</p>
Both the current lodged Design Report and Landscape Report fail to consider visual and landscape impacts of the proposal as viewed from the adjacent farm. No analysis of impacts from our clients the Kavanagh's adjoining property is included in either document, despite the farm being the closest residential and rural use to the site and with views of the Kavanagh farmland forming a particular noted feature of the redevelopment.	A visual impact analysis is included at Section 6.2.2 of the EIS. Additional discussion on views from the Kavanagh property are provided at Section 6 of this RtS.
The submitted architectural plans should include clear and specific details that confirm the existing ground levels and existing roof levels for the site so that the proposed building height can be accurately checked at any particular location on the site and to compare the proposal with existing building roof heights, including for those buildings proposed in proximity of the southern boundary of the site. The submitted survey of the site does not assist with this analysis in any real sense.	<p>Existing levels are provided on the site survey at Appendix 4 of the EIS, and roof levels are shown on the architectural drawings at Appendix 1. Further RL annotation is included in the updated architectural drawings submitted with this RtS. This is a typical level of detail for development applications.</p> <p>The visual impact discussion at Section 6 of this RtS provides further relevant discussion.</p>
The Residential Pavilions 1, 2, 3 and 4 will be the closest new buildings to the farm and associated three farm	The proposed residential pavilions will appear two-storey in form, with a subfloor area visible at Pavilions 3 and 4. The

Table 15. Response to public submission

Issue	Response
<p>houses and will be very prominent – it appears up to 4 ½ storeys in scale/built form, when the fill and subfloor areas under the nominated ground floor are also included as well as the steep pitched roof. The four residential pavilions are proposed to be positioned around the promontory edge in a wall like arrangement and will replace the existing more modest floor areas at the current hospital site including the two and three storey St Augustine's building. It is relevant to note that whilst St Augustines has a slim three storey element possibly up to a height of 10m (not able to be confirmed due to lack of detail), it is well articulated and does not wrap around the entire southern boundary. The Monastery, the Archives and pool area were constructed in the 1950s and their built form is well modulated, does not exceed 10m above natural ground level and does not contain large areas of glazing that overlooks the farm. This existing built form is also softened by significant established gardens and vegetation.</p> <p>By contrast the proposed four residential pavilions include extensive glazing, are deliberately orientated outward to the south in order to obtain a direct outlook over the adjacent farmland and to the mountains beyond and additionally, kitchen and large lounge areas with wrap around full height glazing are proposed to further maximise views. Further, the existing established vegetation will largely be replaced by grassed lawn in a narrow 5m setback from the southern property boundary.</p>	<p>subfloor area, however, will be open (with the built form raised on stilts) and will not read as a solid level, which will help soften the appearance of the built form. Also, the subfloor area will not be readily visible from the nearest dwelling as discussed at Section 6 of this RfS.</p>
<p>The imposing height of these four residential pavilions does not appear to have been informed by any site inspection and analysis of the proposal as viewed from the closest rural neighbour (being the three</p>	<p>The height and location of the residential pavilions were informed by detailed analysis that balanced heritage, view, design and operational considerations. It was deemed appropriate to provide well-designed two-storey built form in the</p>

Table 15. Response to public submission

Issue	Response
<p>dwellings and farmland at the Kavanagh's farm).</p>	<p>location of existing dated buildings. This solution declutters the curtilage of Belmont House, avoids unnecessary vegetation removal on the remainder of the site and allows for expansion of patient capacity to meet demand.</p> <p>Refer to Section 6 of this RtS for further discussion regarding views from the nearest neighbouring dwelling.</p>
<p>Nor does the view analysis document consider how much more visible the proposed new hospital will be from its ridgetop location from multiple places around the farm, with proposed new two storey buildings up to RL 13.4m above the existing elevated promontory but with no details provided of proposed natural ground level, any fill and/or the additional height above natural ground level of proposed subfloor areas.</p>	<p>Additional analysis considering views from the Kavanagh property is provided at Section 6 of this RtS.</p>
<p>The existing hospital is clearly visible from many areas around the rear portion of the Kavanagh's farm and their farmhouse in particular and it is clear that the proposed additional height coupled with increased fill and basement level plus removal of existing established vegetation on the promontory will unnecessarily increase the overall prominence and visibility of the hospital site.</p>	<p>The proposed development, while visible from the Kavanagh property, generally complies with the LEP's height limit. The proposed minor variation for certain rooftop areas is justified from a planning perspective as discussed in the submitted clause 4.6 variation and above in this RtS.</p> <p>Notably, a mix of cut and fill (not just fill) is proposed for the area of the residential pavilions. While portions of Residential Pavilions 3 and 4 will require fill, Residential Pavilions 1 and 2 will require cut of a similar scale. The overall effect will be consistent two-storey built form that is only slightly more visible than the current development.</p>
<p>3. A reduced roof height and a reduced adopted ground level for all 4 of the residential pavilions is requested – these pavilions being positioned along the southern edge of the hospital site and which are currently proposed to exceed the adopted height of buildings control by 3.4m.</p>	<p>A reduced roof height and reduced ground level are considered unnecessary. The development as proposed will provide positive outcome with no unacceptable environmental impacts, as discussed throughout the submitted EIS and this RtS.</p> <p>It is noted that a mix of cut and fill is required for the area of the residential pavilions. A reduced ground level at all residential pavilions, as requested by the</p>

Table 15. Response to public submission

Issue	Response
	<p>objector, would require additional cut in the location of Residential Pavilions 1 and 2, which is undesirable from an environmental impact perspective. This would also complicate access across the site.</p>
<p>4. Modified landscaped planting and security fence treatment - for the proposed grassed area between the residential pavilions and the southern property boundary, new tree and shrub plantings are required to replace the removal of the existing established trees in this location.</p>	<p>The vast majority of the trees on the site, including the steep southern slope, will be retained. Only one tree (tree no. 217) is proposed to be removed between the southwest boundary and the existing St Augustines and Monastery buildings, and only four trees (tree nos. 224, 225, 226 and 289) are proposed to be removed in the area between the current CTC Unit and Archives building. Refer to the tree retention and removal plan at Appendix 1 of the EIS for further detail.</p> <p>Shrubs will be planted along the edge of the new residential pavilions, as demonstrated in the landscape plans at Appendix 3 of the EIS. Large trees are inappropriate landscaping for this setback as they would be too close to the built form.</p> <p>It is noted that the landscape plans have been updated as part of this RtS to include additional detail (refer to Appendix 6).</p>
<p>Security fencing is also required to prevent patient access to the southern boundary, to remove opportunity for rubbish to continue to be thrown over the edge of the hospital site onto the Kavanagh's farm. Rubbish is a major issue for the Kavanagh's. Whilst bins are positioned along the hospital driveway walking path bins also need to be provided near the new accommodation. No opening windows will further assist as will provision of a fence to prevent walkers from accessing the southern edge of the property.</p>	<p>Perimeter security fencing is not an appropriate solution for the development. Patients are not confined to the hospital against their will but rather attend the hospital voluntarily. While there are curfew hours, we are unaware of any notable issue regarding patients accessing the neighbouring land.</p> <p>As part of the redevelopment, waste storage and collection are proposed to occur at the Xavier Building, further away from the boundary with the Kavanagh property than the current arrangements.</p> <p>The residential pavilions include no openable windows, consistent with the objector's preference.</p>
<p>5. Expert consideration of available mitigations to address likely Noise/Acoustic Impacts and other</p>	<p>Expert consideration of noise impacts has been submitted in the form of an operational acoustic report and</p>

Table 15. Response to public submission

Issue	Response
<p>Land Use Conflicts – arising from the ongoing farm operations on the hospital and which include periodic shooting of livestock and vermin, burning of vegetation, spraying of weeds and application of fertiliser, amongst other standard farming activities. Air conditioning plant noise impacts for the farmhouse must also be addressed.</p>	<p>construction noise report (see Appendices 13a and 13b, respectively of the EIS). Additionally, updated acoustic reports (Appendices 3a and 3b of this RfS) have been submitted to address issues raised by DPIE.</p>
<p>6. Asbestos Monitoring – An Asbestos Management Plan is included in the DA documentation at Appendix 11b which has been prepared by Airsafe. The Kavanagh's are most concerned about the presence of asbestos in the old buildings proposed for demolition, especially as Mr Kavanagh has asbestosis. Section 6.6 of the Asbestos Management Plan report discusses air monitoring. Asbestos monitoring devices should be required by condition of consent to be installed on the Kavanagh's property during the construction phase of the hospital redevelopment. In addition to their main house, the Kavanagh's also have 2 other houses occupied on their farm with tenants and they feel responsible for their health as well, so they request that these other dwellings have asbestos monitors installed near their homes also.</p>	<p>The applicant is committed to implementing the recommendations in the submitted asbestos management plan. Monitoring will be carried out as required based on specialist advice.</p>
<p>7. Stormwater Erosion Rectification Works - the St John of God site has caused a significant existing erosion issue for the adjacent farm site owned by the Kavanagh's. The new proposed stormwater arrangements are a rock dissipation area and onsite 40 kL detention tank which seem satisfactory but which do nothing to address the current stormwater erosion that has occurred on the farm to date due to Stormwater runoff from the hospital. It is requested that the existing stormwater erosion point on the farm now be rehabilitated based on</p>	<p>This SSD application is not an appropriate forum for addressing the objector's complaint on erosion. It would be an unreasonable to impose a condition requiring rehabilitation of the alleged erosion issue, as such a condition would not relate to the subject application.</p> <p>It is noted that the proposed stormwater design ensures stormwater from the new buildings is discharged to the Hawkesbury River.</p>

Table 15. Response to public submission

Issue	Response
expert advice. It is anticipated that a condition of consent could be imposed requiring the existing stormwater erosion point on the adjacent farm (caused by stormwater runoff from the hospital site) to be rehabilitated, in consultation with the neighbours.	

5.2 Consultation with neighbour

The applicant invited the objecting neighbour to a community information session held on 21 April 2021 and also to a personal discussion with the hospital CEO prior to the information session. The neighbour declined the invitation.

The applicant made further effort to engage with the neighbour and arranged a meeting on 7 May 2021. At this meeting the neighbour voiced their key concerns, and the applicant provided clarification. The meeting ended with the neighbour acknowledging that, while they would prefer the project not to proceed, they realise the hospital needs upgrading and there is no alternative area on the site on which to build. Key issues discussed at the meeting are outlined in the table below.

Table 16. Neighbour meeting details

Issue	Outcome
Visual privacy The neighbour's main concern with privacy is that the whole hospital from the new build would look down into their property, particularly their swimming pool and entertaining area.	The applicant showed 3D images of the proposal to the neighbour. It was clarified that a major theme of the design is that the various internal areas are split up into public, semi-public, semi-private and private areas and that this design encourages hospital clients to spend the majority of their time away from the residential area and only use it for sleeping. All groups rooms, dining, exercise, arts and crafts area, games rooms, etc. are kept away from the residential area. The only areas in the new build overlooking the neighbour's entertaining area are the private residential areas (bedrooms), and only 14 bedrooms (7 ground floor and 7 first floor) would overlook this area. Landscaping from both parties would also help with this matter.
Acoustic impacts The neighbour voiced concerns in regards to the air conditioning and the noise level coming from the plant.	The neighbours were shown the roof plant plan and were informed that the whole plant would be in enclosed and that it is in the hospital's best interest to keep this plant room as acoustically soundproof as possible for the benefit of their clients.

Table 16. Neighbour meeting details

Issue	Outcome
	Enclosing the plant will prevent noise transfer and also keep the plant safe from bush fires embers.
Aesthetics The aesthetics of the new building were discussed, particularly in relation to the view from the neighbour's property.	The applicant showed 3D images of the proposal to the neighbour to demonstrate that the new building design would be in keeping with the rural setting. They neighbour asked if they could be kept in consultation regarding external colours of the main building. The applicant agreed to keep the neighbour informed.

6 Additional requests

The table below provides a response to DPIE's additional requests sent via email dated 1 April and 16 April 2021.

Table 17. Response to additional DPIE requests

Issue	Response
The total gross floor area of the final development.	The total GFA of the new buildings is approximately 6,227.2sqm, broken down as follows: <ul style="list-style-type: none"> • Garden pavilion: 1,055.4sqm • Wellness centre: 728.4sqm • Residential pavilions: 4,443.4sqm GFA drawings are included at Appendix 5 of this RtS.
The expected timeframes of each stage, rough timeframes are fine (i.e. Q1 of 2021 to Q2 2021 as an estimate for stage 1) to determine if any of the stages overlap.	The proposed timeframes are as follows: <ul style="list-style-type: none"> • Stage 1: Jan. 2022 to Jan. 2022 • Stage 2: Jan. 2022 to Mar. 2022 • Stage 3: March 2022 to Jan. 2023 • Stage 4: Jan. 2023 to Jan. 2023 • Stage 5: Jan. 2023 to Apr. 2023 • Stage 6: April. 2023 to Jun. 2023 • Stage 7: June 2023 to July 2023 • Stage 8: June 2023 to July 2023
Provide annotations on the elevations for all new buildings to describe the proposed external materials and finishes	Refer to the updated drawings at Appendix 2 of this RtS.

Table 17. Response to additional DPIE requests

Issue	Response
(incl. colours) and include a corresponding detailed schedule of finishes.	
Amend the RLs on the architectural roof plan (Drawing SSK11) ensuring the final height RLs are correctly annotated.	Refer to the updated drawings at Appendix 2 of this RfS.
Include the maximum RL for all new buildings (top of the roof) on the elevation plans.	Refer to the updated drawings at Appendix 2 of this RfS.

7 Additional visual impact assessment

The series of diagrams below provide additional visual impact assessment of the proposed development when viewed from the nearest neighbouring dwelling to the southwest (which is approximately 300m from the hospital). Specifically, the diagrams show:

- a) Existing development;
- b) New development overlaid on existing development; and
- c) New development.

Full-sized versions are attached at **Appendix 1**.



a) Existing development



b) New development overlaid on existing development (development to be demolished in red)



c) New development

As the images demonstrate, the proposal will introduce minor additional built form visible from the neighbouring dwelling, but the overall effect would be easily compatible with the surrounding area.

The new buildings would appear not an uncharacteristic element but rather as a low scale series of connected pavilions suitable to the rural landscape and consistent with the existing function of the site as a hospital.

As clearly demonstrated by the above images, the height would read as two-storey with a typical pitched roof. The fill required at the southern portion of the development would not cause the development to extend unnaturally above the existing ground level. In fact, as shown in the images, even the ground level would be largely hidden from view due to intervening terrain.

8 Conclusion

This RfS has considered the submissions received in response to the public exhibition of SSD-10394. Submissions were received from DPIE, government agencies and the general public. Minor amendments to the proposed development and further information have been provided to address these matters.

The proposed development as amended is considered to warrant approval for the following reasons:

- Further information has been provided to address comments.
- The amended proposal will result in a high quality development that achieves the original aims of the proposal while resulting in no unacceptable environmental impacts.

Based on the supporting material provided in this RfS in addition to the material provided in the original EIS, DPIE has now been provided with sufficient information and documentation to progress the assessment of SSD-10394. It is requested that DPIE complete the assessment of the SSD and proceed to determination.

