



Environmental Impact Statement

Redevelopment of Greenwich Hospital Campus

Greenwich Hospital
97 – 115 River Road, Greenwich

Our Ref: CC140088

January 2019

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In respect of	State Significant Development Application (ref: SSD 8699) for the proposed redevelopment of Greenwich Hospital campus and associated works as described in Section 4 of this Environmental Impact Statement (EIS).

Applicant and Land Details

Applicant	HammondCare
Applicant Address	Level 2, 447 Kent Street, Sydney NSW 2000
Land to be developed	97 – 115 River Road, Greenwich NSW 2065 (Lot 3 and 4 DP 584287)

Declaration

This Environmental Impact Statement (EIS) has been prepared in accordance with the Environmental Planning and Assessment Act 1979, Environmental Planning and Assessment Regulation 2000 and Secretary's Environmental Assessment requirements.

We certify that the information contained in this Environmental Impact Statement is neither false or misleading.



Ian Stewart
Director
Barker Ryan Stewart



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Complete Urban

Appendix E – Site Survey

Lockley Land Title Solutions

Appendix F – Quantity Surveyors Report

Slattery QS

Appendix G – Traffic & Parking Impact Assessment Report

Barker Ryan Stewart

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NBRS Architecture

Appendix I – Civil Engineering

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HammondCare

1 Executive Summary

This Environmental Impact Statement (EIS) has been prepared on behalf of HammondCare to support a concept proposal for State Significant Development (SSD No 8699) – refer to Owners authority included in Appendix S. It is in accordance with the Environmental Planning and Assessment Act 1979, Environmental Planning and Assessment Regulation 2000 and Secretary's Environmental Assessment Requirements. The information included in this EIS is based on the architectural plans provided by Bickerton Masters Architecture and supporting consultant documentation included within the relevant Appendices.

HammondCare has owned and operated Greenwich Hospital since 2008, providing rehabilitation, palliative and supportive care, mental health care for older people, pain management, and other vital support services. Although the standard of care at Greenwich Hospital is widely recognised as excellent, the building fabric of the hospital has now reached the end of its design and useful life and is no longer suitable for best practice service delivery.

This EIS relates to a concept proposal for the redevelopment of the existing Greenwich Hospital for a campus style hospital including both health and living facilities. The preferred planning concept has been established with assistance from specialist consultants and provides for the replacement of out-dated health and hospital facilities, together with aged care and associated seniors living units. The redevelopment of Greenwich Hospital campus represents the evolution of HammondCare's very successful campus development at Miranda.

Pursuant to Schedule 1 (Clause 14) of State Environmental Planning Policy (State and Regional Development) 2011 development for a hospital with a capital investment value (CIV) of more than \$30 million is identified as a State Significant Development (SSD). As the CIV is over \$30 million the EIS will be submitted to the NSW Department of Planning and Environment for assessment and determination. The application is supported by a variety of supplementary studies and demonstrates rational, orderly, economic and sustainable use of the site and has been designed in accordance with the relevant planning and legislative requirements including all the items contained within the SEARs.

All relevant strategic planning policy and statutory planning controls have been considered in the assessment of the proposal and the proposal complies / satisfies all local and State policies.

Plans prepared by Bickerton Masters Architecture illustrate the proposal's consideration of the site, the location and the existing characteristics of the area. The proposal will provide new quality facilities that will provide modern health care facilities. The site is ideal for the proposal given the size of the site and the existing use. It ensures protection of the heritage values of the site and there are no significant environmental constraints that would limit the proposal from being developed at the site.

This EIS demonstrates the proposal is in the public's best interest. The proposed development will allow for the redevelopment of a key hospital facility and associated development that will be important for the area.

Our assessment confirms that the concept proposal warrants approval. The development will not result in any significant or adverse overshadowing, acoustic, privacy or amenity issues; the design and built form will complement the area, the streetscape; and mitigation measures will manage potential environmental and construction impacts. The proposal has been assessed against all items contained within the Secretary's Environmental Assessment Requirements (SEARs) as detailed in Section 5 and further details of the proposal's compliance is detailed within the body of the EIS.

2 Introduction

2.1 Purpose of this Environmental Impact Statement

The proposed redevelopment of Greenwich Hospital Campus has a capital investment value of \$141.5 million and is therefore classified State Significant Development (SSD) pursuant to Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011. This Environmental Impact Statement (EIS) has been prepared in accordance with the provisions of State Environmental Planning Policy (State and Regional Development) 2011, Schedule 2 of Environmental Planning and Assessment Regulation 2000 and the issues and matters for consideration outlined in the Secretary Environmental Assessment Requirements (ref: SSD 8699).

2.2 Project Team

The project team is included in Table 1 below.

Table 1: Project Team

Applicant	HammondCare
Architect	Bickerton Masters Architecture
Town Planner	Barker Ryan Stewart
Landscape Architect	Complete Urban
Surveyor	Lockley Land Title Solutions
Quantity Surveyor	Slattery Quantity Surveyors
Traffic Engineer	Barker Ryan Stewart
Civil Engineer	Barker Ryan Stewart
Heritage Advisor	NBRS Architecture
Geotechnical Consultant	Jeffery and Katauskas Pty Ltd
Bushfire Consultant	Building Code & Bushfire Hazard Solutions
Arborist	Redgum
Aboriginal Archaeologist	Cultural Heritage Connections and GML Archaeology
Ecologist	Keystone Ecological
Contamination	Douglas Partners
Noise and Vibration	Acoustic Logic

2.3 Structure of this Environmental Impact Statement

Table 2: Structure of Environmental Impact Statement

DOCUMENT SECTION		DESCRIPTION
Section 1	Executive Summary	Project summary
Section 2	Introduction	Purpose of the EIS and objectives of the proposed development
Section 3	Site Analysis	Overview, location and history of subject site
Section 4	Development Description	Overview of proposed concept development, CIV and analysis of alternatives

DOCUMENT SECTION		DESCRIPTION
Section 5	Secretary Environmental Assessment Requirements	Overview of SEARs issued by Department of Planning & Environment on 29 November 2017
Section 6	Federal Legislative Framework	Consideration of relevant federal legislation
Section 7	State and Regional Statutory Planning Framework	Consideration of relevant state and regional planning frameworks and strategies
Section 8	Local Planning Framework	Consideration of local planning framework
Section 9	Environmental Impact Assessment	Response to SEARs
Section 10	Environmental Risk Assessment and Mitigation Measures	Environmental risk matrix
Section 11	Justification for Proposed Development	Project justification and considerations
Section 12	Conclusion	Summary of concept proposal and recommendations

2.4 Objectives of the Development

As an independent Christian charity, HammondCare is dedicated to improving the quality of life for people in need. HammondCare is passionate and innovative in their approach to health and aged care and remains committed to providing high quality services to older people and those that are financially disadvantaged.

HammondCare is ideally placed to provide a broad continuum of care responding to a wide range of care needs. HammondCare's objectives for the redevelopment of Greenwich Hospital into a campus style development include:

- Delivering a campus of co-located sub-acute and seniors care / residential services with an integrated convergent model of care;
- Creating physical environments that are both prosthetic and therapeutic;
- Providing services on the site that can overlap, share spaces and resources; and
- Enabling the thoughtful and sensitive transition of residents, patients and clients to different services of need.

The campus style development provides users / residents access to various levels of care services without the need to relocate. This is particularly appropriate for singles without family support and co-location of couples when / if they have significantly varied care needs.

3 Site Analysis

3.1 Site Location and Context

Greenwich Hospital is located at 97 – 115 River Road, Greenwich, the real property descriptions are Lot 3 and Lot 4 DP 584287, as shown in Figure 1. The subject site is zoned SP2 Infrastructure (Health Service Facilities) under Lane Cove Local Environmental Plan 2009.

The site is roughly rectangular in shape and incorporates an area of approximately 3.376ha. The site has road frontages to River Road and St Vincent's Road. Two existing vehicle crossovers provide access via River Road and one existing crossover provides access via St Vincent's Road. An internal road network provides vehicular access across the site to at grade car parking. Service vehicle access is available from the northern section of the site on River Road.

Pedestrian footpaths are provided along the site's frontage to River Road and St Vincent's Road.

The topography of the site rises towards the centre from the south-eastern and south-western property boundaries, with the south-western part of the site falling steeply away towards Gore Creek.

On-site vegetation includes a mix of exotic species and remnant vegetation. The existing hospital footprint has been largely disturbed from past construction and consists predominantly of manicured lawns and garden plantings. The perimeter of the site is characterised by remnant vegetation that contributes to the character of the site and provides a visual buffer from surrounding areas.

The site has convenient access to public transport, including a bus stop (service route: 261) located immediately east of the signalised access on River Road, operating with a 10-minute service frequency. This route connects the site to surrounding key centres and the Sydney Central Business District.



Figure 1: Aerial Photo of Site

3.2 Surrounding Development

The locality surrounding Greenwich Hospital is predominately characterised by residential developments, the main variation to this is Greenwich Public School to the north of the site and Gore Hill Creek and Reserve to the south west, which includes a playground and Bob Campbell Oval zoned for public recreation purposes. Refer to Figure 2 for an aerial photograph of the locality.

Greenwich Hospital is well positioned within walking distance to transportation networks and open space and has convenient access to the Pacific Highway and Lane Cove Tunnel. Sydney CBD is located approximately 8km south-east of the site and is accessible by train, bus and ferry services.



Figure 2: Aerial Photo of Locality

3.3 Site History

Pallister House (formally named 'Standish') was built on the site in 1892 and was originally a private residence. Since this time, the site has been associated with a range of welfare and community activities, including use as a girl's home from 1936.

Greenwich Hospital was opened on the site by the Minister for Health in 1966. From 1970 to 1997 the hospital continued to evolve into a multi-disciplinary care practice, featuring purpose-built facilities and a combined network of medical specialists.

In recent years, the services provided at Greenwich Hospital have continued to expand, with new dementia behaviour management and advisory services operating from the site as well as learning and research facilities.

Today, Greenwich Hospital continues to deliver a total care model and is renowned for the highest level of care and range of unique support services.

3.4 Land Ownership

HammondCare has owned and operated Greenwich Hospital since 2008. HammondCare is an independent Christian charity that aims to provide excellent and responsive clinical care, specialising in aged and dementia care, palliative care, rehabilitation, older person's mental health and other health and aged care services.

3.5 Existing Infrastructure and Buildings

The site is serviced by water, sewer, telecommunication and power services.

Lot 3 DP 584287 contains the existing Greenwich hospital, associated inpatient and outpatient facilities, car parking and service areas. Existing buildings range between 1 and 5 storeys in height and are interconnected through internal corridors and external pathways.

The existing buildings and associated facilities, as shown in Figure 3, include:

Main Hospital Building	58 inpatient hospital beds and facilities for palliative care, cancer rehabilitation and general rehabilitation health care services.
Blue Gum Lodge	Pain clinic healthcare services.
Riverglen Unit	20 bed acute care facility for older people in the acute phase of a mental health disorder.

The L-shape heritage curtilage is legally known as Lot 4 DP 584287 and contains the two-storey late Victorian house known as 'Pallister' and grounds. 'Pallister' is listed as state heritage item SHR 00574. The following components of the curtilage area contribute to the significance of Pallister House:

- Pallister the two-storey late Victorian house;
- Tear-drop shaped carriage loop;
- Mature fig tree; and
- Bridle path from the corner of River Road and St Vincent's Road towards 'Pallister'.

Pallister currently houses the hospitals dementia centre, research facilities and education services. It should be noted that no demolition, alterations or additions are proposed to Pallister.

Two existing vehicle crossovers provide access via River Road and one existing crossover provides access via St Vincent's Road. Car parking is provided at grade at various locations across the site. The location of existing buildings relative to River Road, St Vincent's Road and neighbouring residential developments is detailed on the survey plan, included in Appendix E.

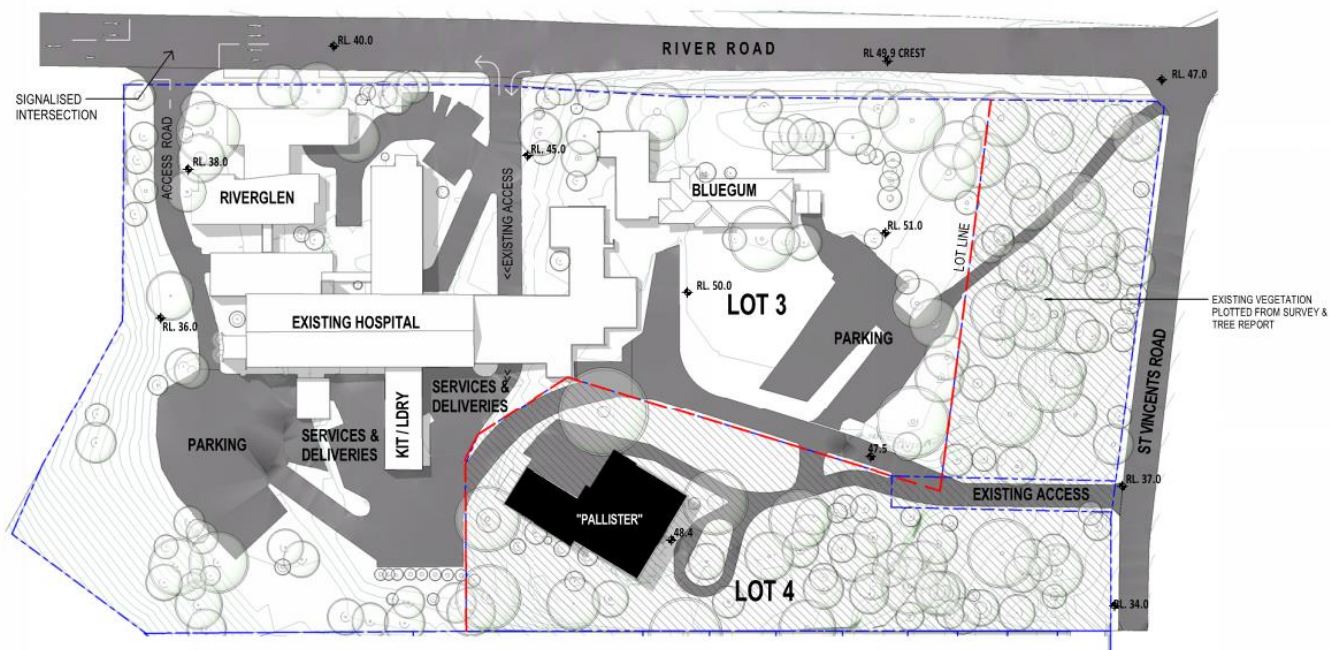


Figure 3: Existing Site Plan

3.6 Photographs of Site

The photographs of the site below show the different aspects of the site.



Photograph 1: View from south-east of the site towards existing hospital building



Photograph 2: Existing 5 storey hospital building and staff car parking



Photograph 3: View from the south-west carpark towards existing hospital building



Photograph 4: Existing hospital building and service area



Photograph 5: View from south-west car park to the rear of Pallister and its current relationship with the hospital buildings



Photograph 6: Pallister House and associated carriage loop



Photograph 7: Pallister House from northern elevation



Photograph 8: Existing vehicle crossover from St Vincent's Road



Photograph 9: Existing vehicle access from St Vincent's Road



Photograph 10: View south towards Pallister from the Bridle Path



Photograph 11: Existing vehicle access from River Road



Photograph 12: St Vincent's Road and River Road intersection showing pedestrian walkway and Bridle Path

4 Development Description

4.1 Overview

Concept proposal approval is being sought for the redevelopment of the Greenwich Hospital Campus.

Greenwich Hospital has operated from the site since 1966. The hospital is run by HammondCare and provides rehabilitation, palliative and supportive care, mental health care for older people, pain management, and other vital support services.

HammondCare's mission is improving the quality of life for people in need.

HammondCare's Mission in action is to serve people with complex health or aged care needs regardless of their circumstances.

In accordance with HammondCare's mission it is intended to provide the following services from the Greenwich site:

- Health and Hospital Services – including palliative and supportive care, rehabilitation, mental health care for older people, pain management and other vital support services including Hospital at Home.
- Residential Aged Care including special Dementia care units.
- Dementia Centre – a partnership funded by Australian Government that provides specialised dementia support nationally to people living with Dementia and their carers.
- Hammond at Home – Home care service to both on and offsite Seniors Living residents.

The hospital and aged care components are intended to be flexible in design so that they can adapt to changes in demographic/community need.

The Seniors Living is to be designed to enable seniors to age in place and if needed, receive Home Care and/or some Health/Hospital services in their home. It also enables couples with differing levels of care needs to be co-located on the same campus.

With this in mind, HammondCare are seeking to provide a consolidated Hospital campus comprising of:

- 150 place Hospital health care facility with a mix of inpatient hospital beds, palliative care beds and residential aged care beds;
- Inpatient and outpatient support services and areas necessary to provide a modern, attractive health facility consistent with Hammond Care's high standard of care;
- Seniors living units associated with the hospital style campus model that includes approximately:
 - 80 new seniors living units (apartments) addressing River Road, and
 - 9 new seniors living units (villas) addressing St Vincents Road;
- Pallister House will be retained and continue to fulfil its current functions as part of the hospital campus; and
- Onsite car parking in accordance with code requirements.

A subsequent State Significant Development application will be lodged for construction and use of the site, subject to obtaining concept proposal approval.

4.2 Site Preparation

4.2.1 Demolition Details

The demolition of the majority of the existing buildings and structures on site (excluding Pallister House which will be retained in its current form) is required to accommodate the proposed redevelopment of Greenwich Hospital campus. Demolition will be staged to allow the hospital and associated facilities to

continue functioning. Where possible, materials will be salvaged for recycling and reuse during the demolition process. The remaining waste will be transported to a recognised waste facility.

A waste management plan will be required to be submitted with the detailed development applications following the approval of the concept application.

4.2.2 Excavation

A preliminary geotechnical assessment was undertaken in 2010 to assess the existing stability of the site, evaluate current levels of risk and provide recommendations regarding future development at the site. Refer to Appendix K. Further excavation details and a detailed geotechnical assessment will be provided with the detailed development application.

4.2.3 Tree Retention and Removal

An arboricultural impact statement and tree management plan have been prepared by Redgum Horticultural to determine impacts associated with the proposed development and provide recommendations for the retention and removal of trees.

Tree removal and replacement is required to facilitate the proposed development. The implementation of appropriate protection measures will allow for trees to be retained and integrated with the proposed development.

Significant and large trees to the perimeter of the site will be retained to maintain the leafy outlook and create a visual buffer that improves the amenity of the streetscape. The south-western corner of the site contains a densely vegetated area extending down a steep slope towards Gore Creek. This part of the site will remain largely intact. Tree retention on site will exceed required tree removal.

Figure 4 below shows the existing tree count and identifies trees to be retained and removed.

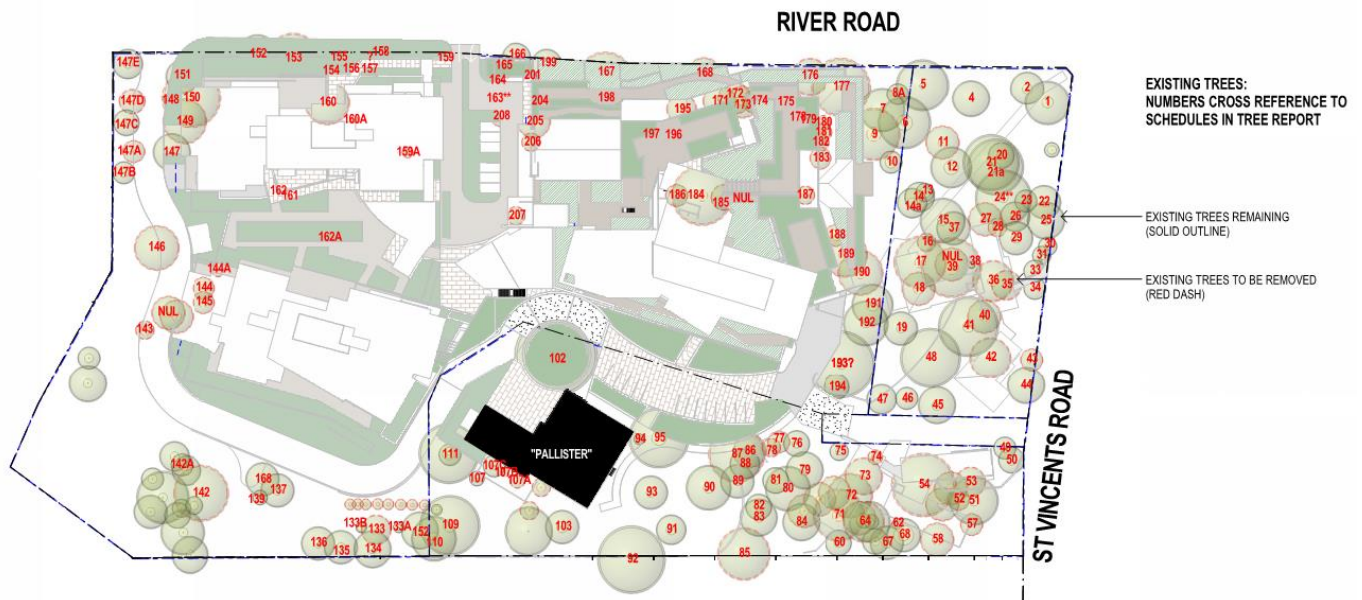


Figure 4: Existing Trees

4.3 Proposed Development

4.3.1 Concept Development

Development consent is sought for the redevelopment of Greenwich Hospital campus. the proposed development is in accordance with the concept architectural drawings prepared by Bickerton Masters Architecture, landscape plans and civil engineering plans.

The proposed redevelopment of Greenwich Hospital campus is an opportunity to replace existing hospital facilities and deliver a wide range of services for inpatients, outpatients and the wider community. The integrated campus will also bring together key elements of HammondCare's core services and futureproof the site through flexible and sustainable building design.

The proposed site plan and site analysis plan are included in Figures 5 and 6 below.

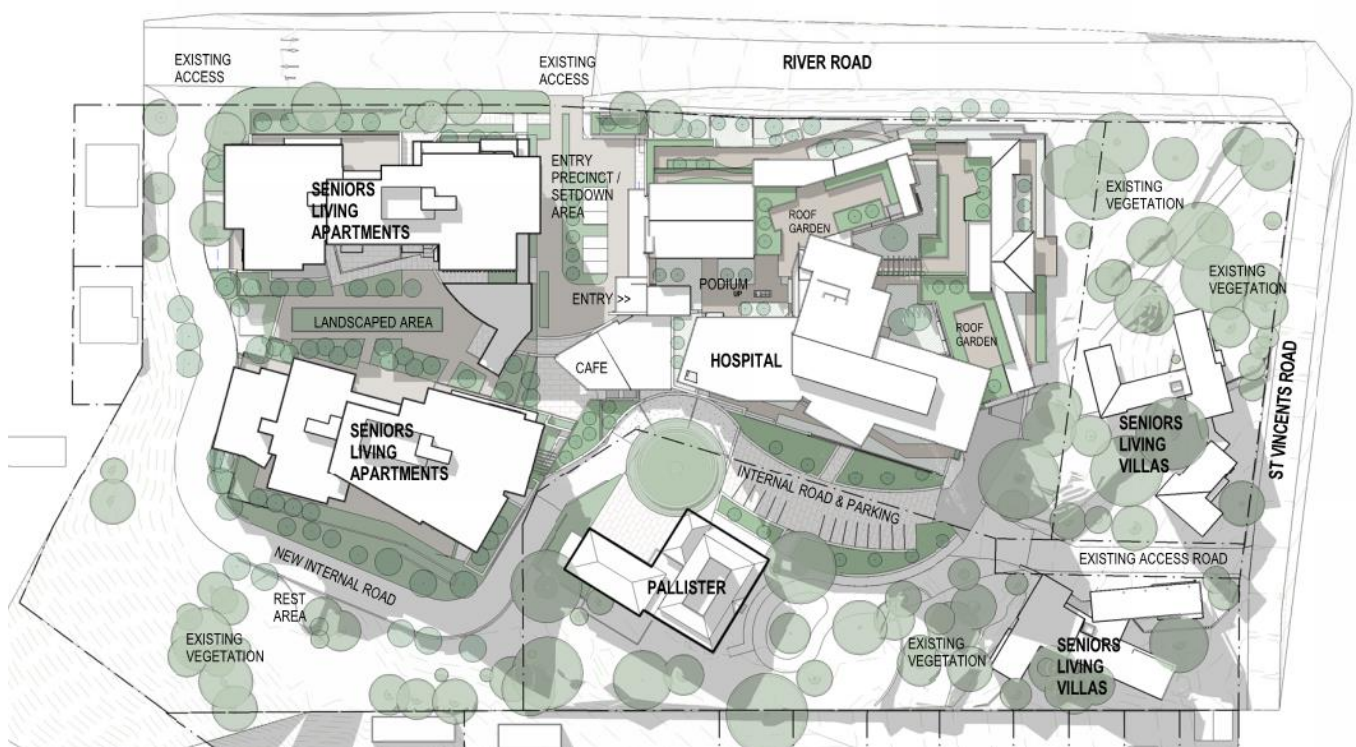


Figure 5: Proposed Site Plan

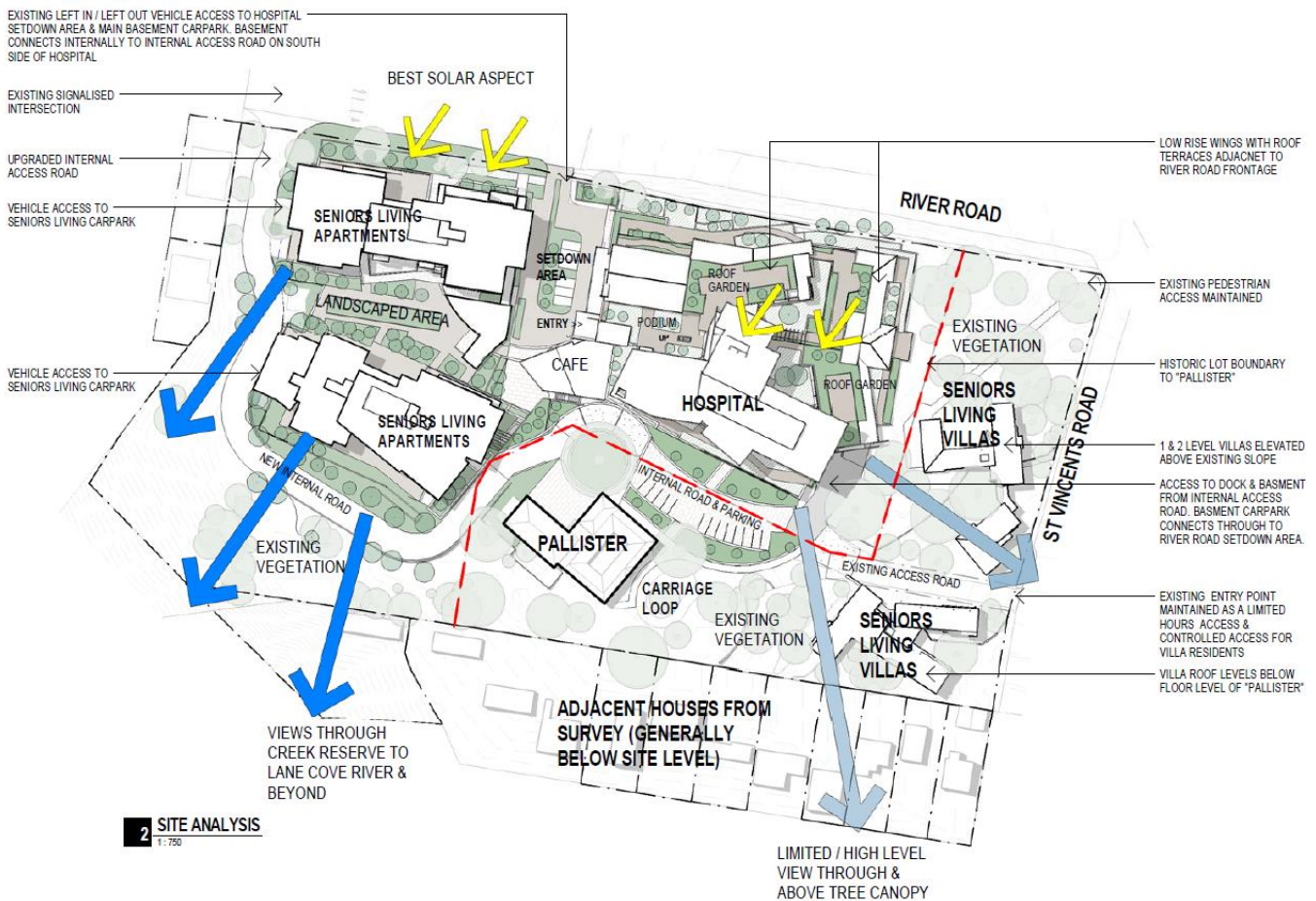


Figure 6: Site Analysis Plan

Hospital, Health Facilities and Low-Rise Dementia Care Precinct

The proposed hospital building adopts a podium-tower typology that is articulated into three faceted wings. The form of the building aims to address the sites topography and reduce the appearance of bulk and scale whilst still achieving optimum organisational layouts for hospital use. The podium levels provide circulation, servicing, administration and landscaping.

The hospital, health facilities and low-rise dementia care precinct will have capacity to accommodate inpatient hospital beds, palliative care beds, residential care beds and outpatient services.

Refer to concept proposal extracts in Figures 7 - 12 below and architectural plans included in Appendix B.

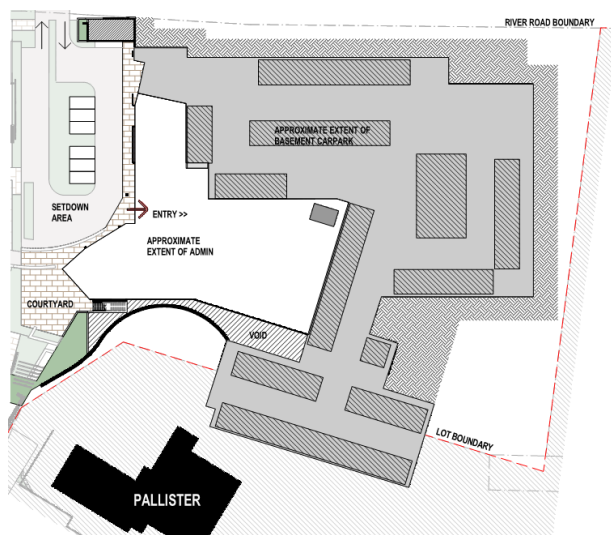


Figure 7: Hospital Level H1 Lower Ground Extract

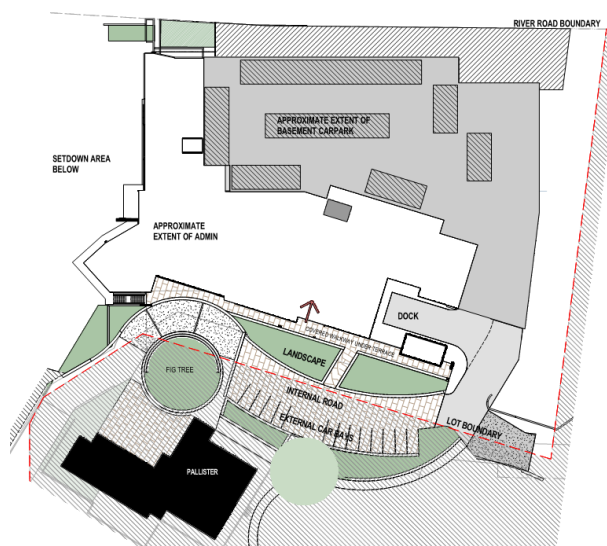


Figure 8: Hospital Level H2 Upper Ground

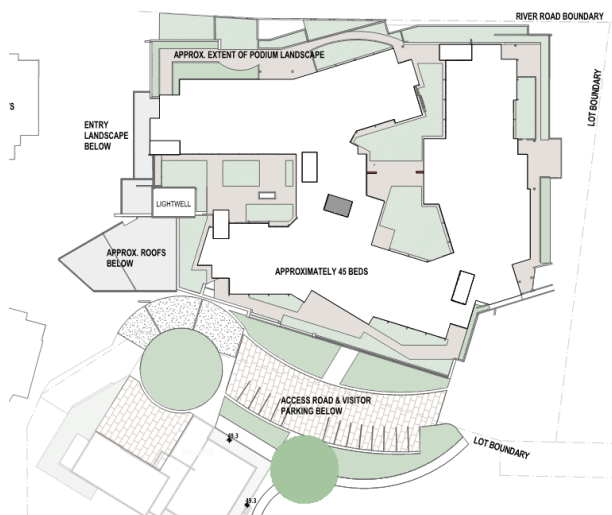


Figure 9: Hospital Level H3 Podium

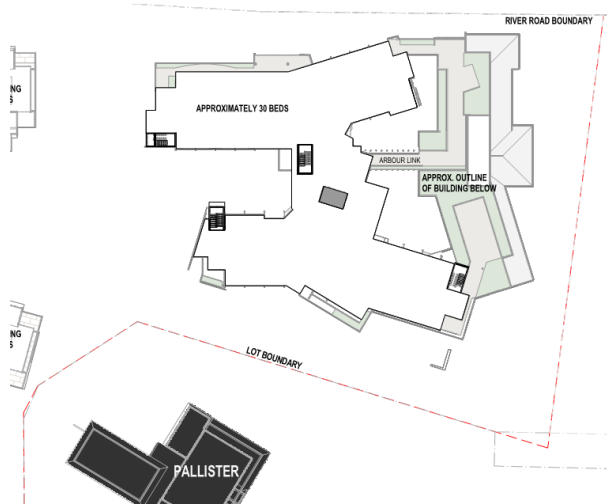


Figure 10: Hospital Level H4

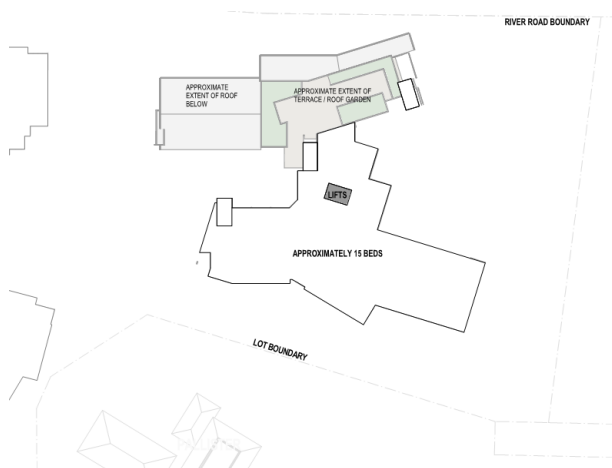


Figure 11: Hospital Level H5

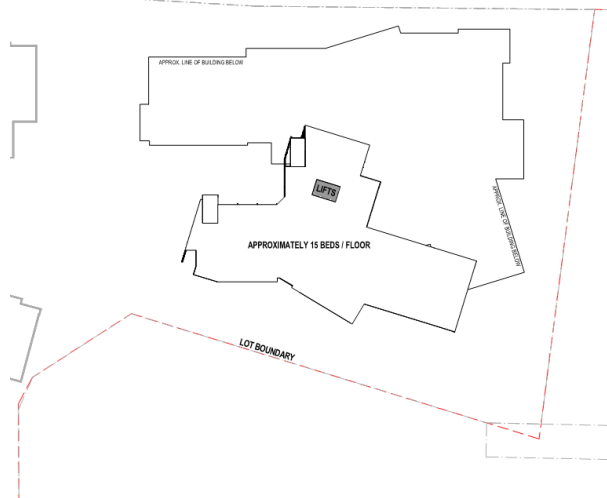


Figure 12: Hospital Level H6 – H9

Seniors Living Precinct

80 new seniors living units (apartments) addressing River Road and 9 new seniors living units (villas) addressing St Vincents Road are proposed for the site, are ancillary to the use of the hospital and form part of the overall hospital campus facilities and the HammondCare's continuum of care model.

Refer to concept proposal extracts and 3D perspectives in Figures 13 - 19 below and architectural concept proposals included in Appendix B.

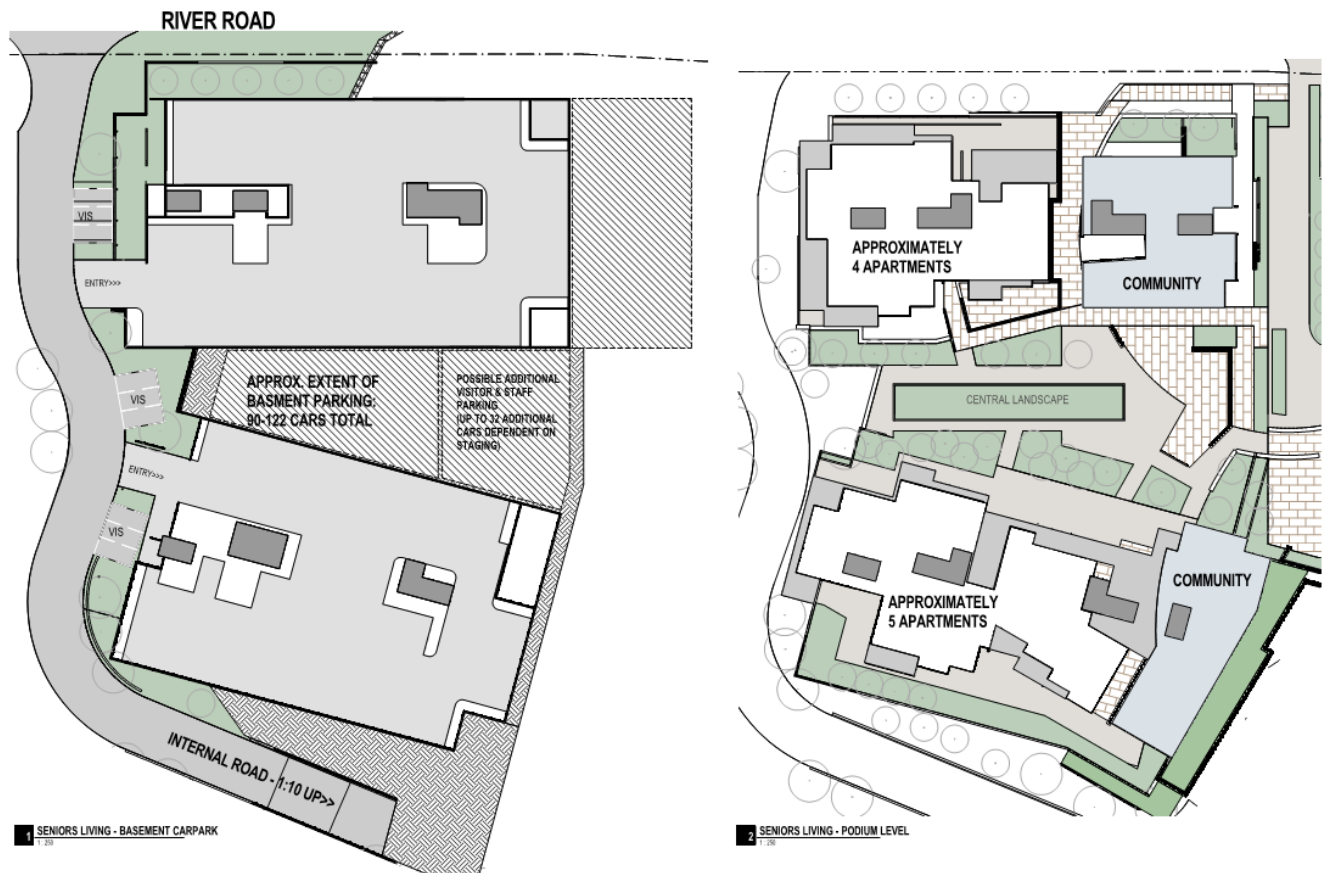


Figure 13: Seniors Living Units (Apartments) Basement & Podium Levels

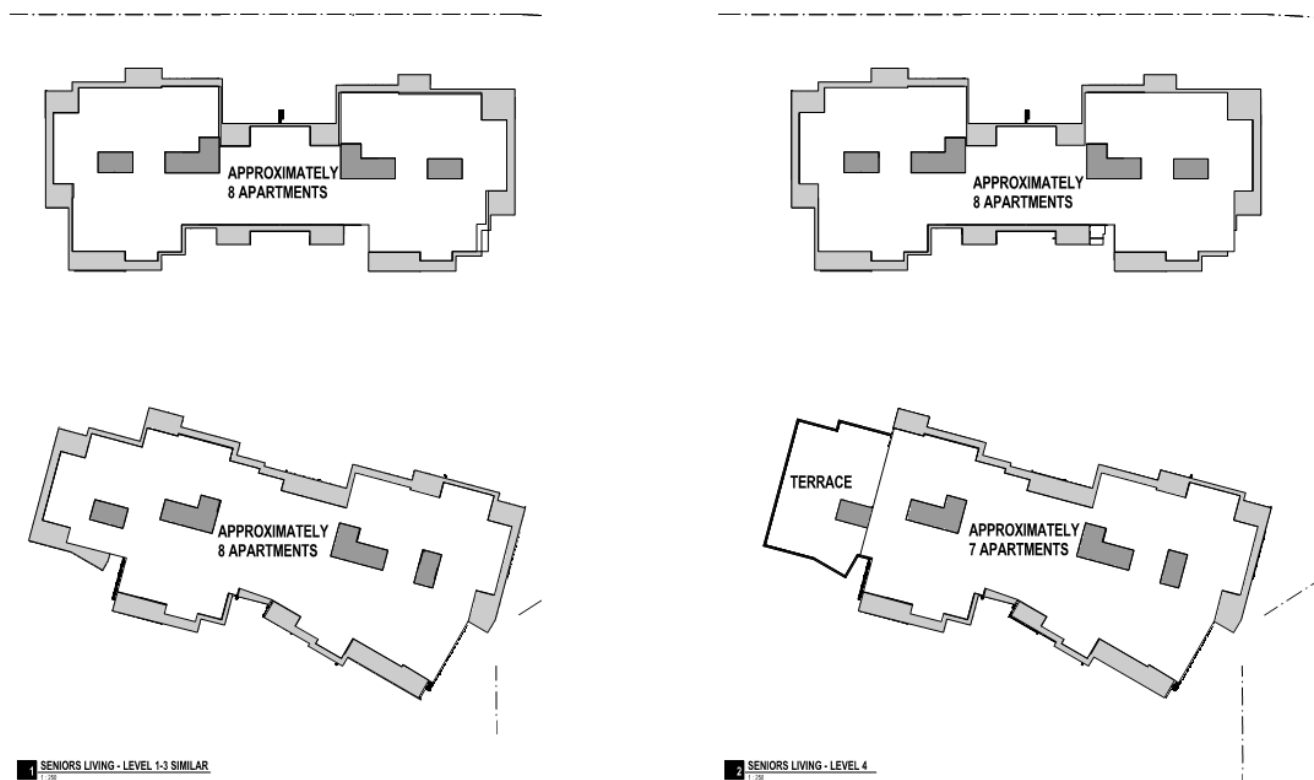


Figure 14: Seniors Living Units (Apartments) Levels 1 – 4

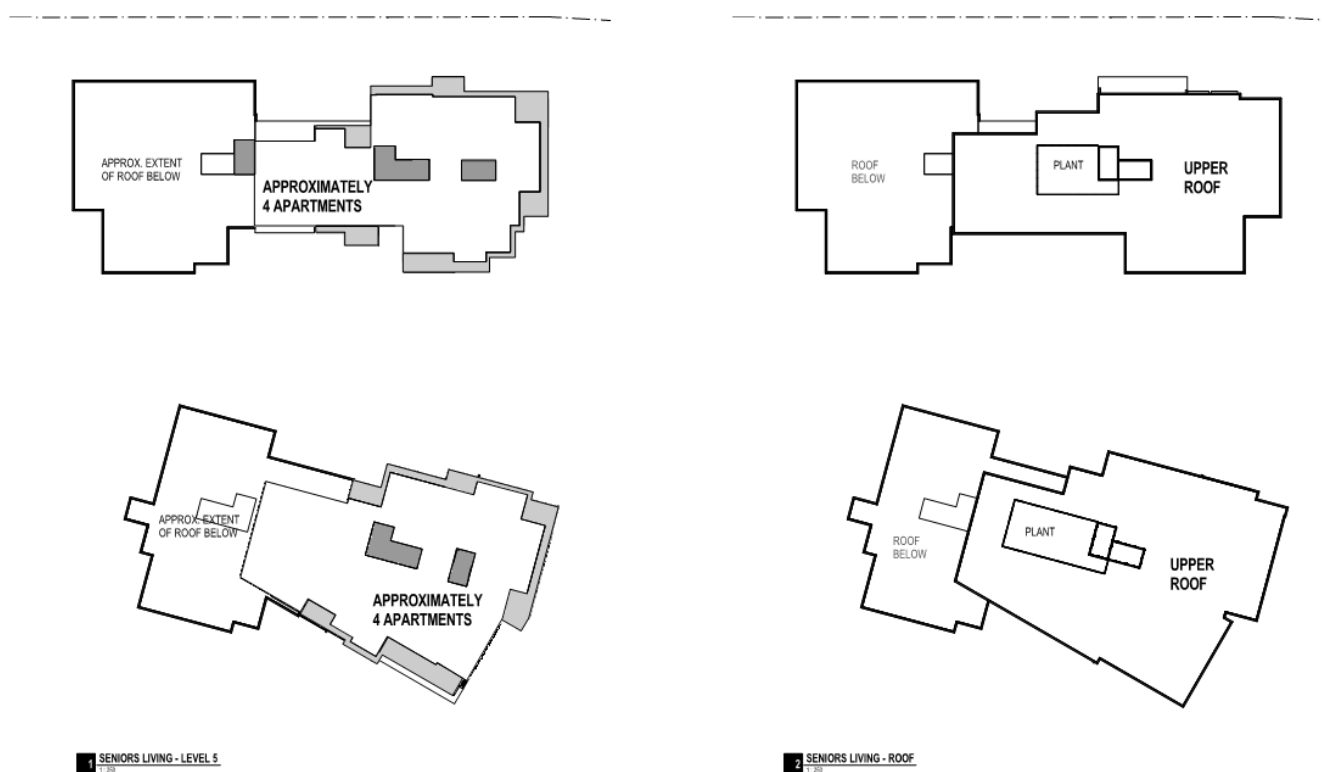
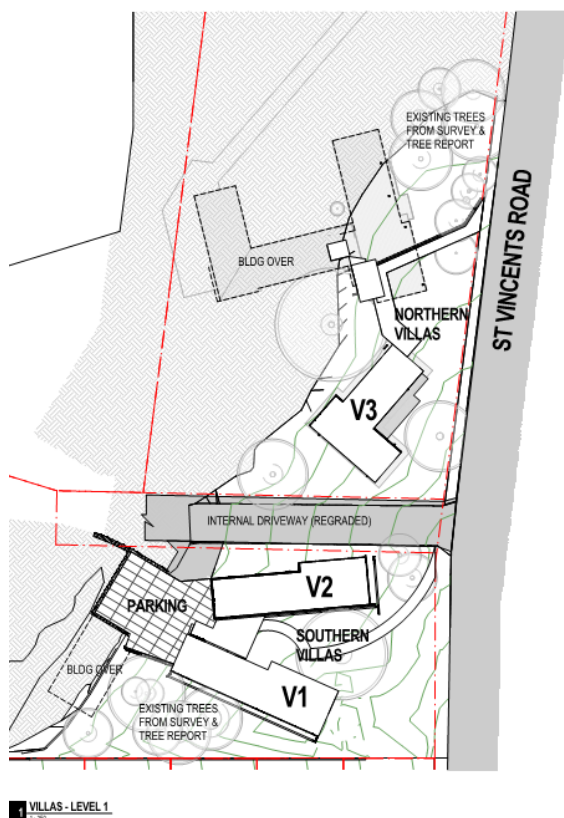


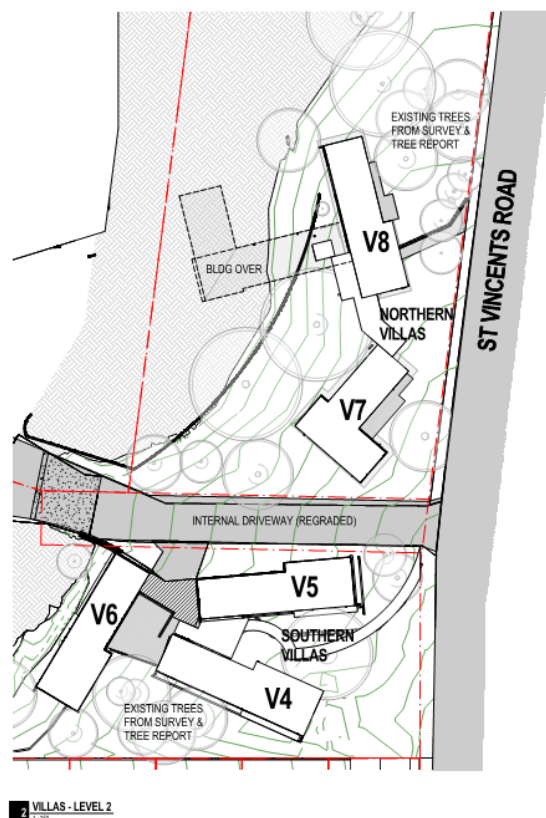
Figure 15: Seniors Living Units (Apartments) Upper Level 5 & Roof



Figure 16: Seniors Housing (Apartments) 3D Perspective



VILLAS - LEVEL 1



VILLAS - LEVEL 2

Figure 17: Seniors Living Units (Villas) Level 1 – 2

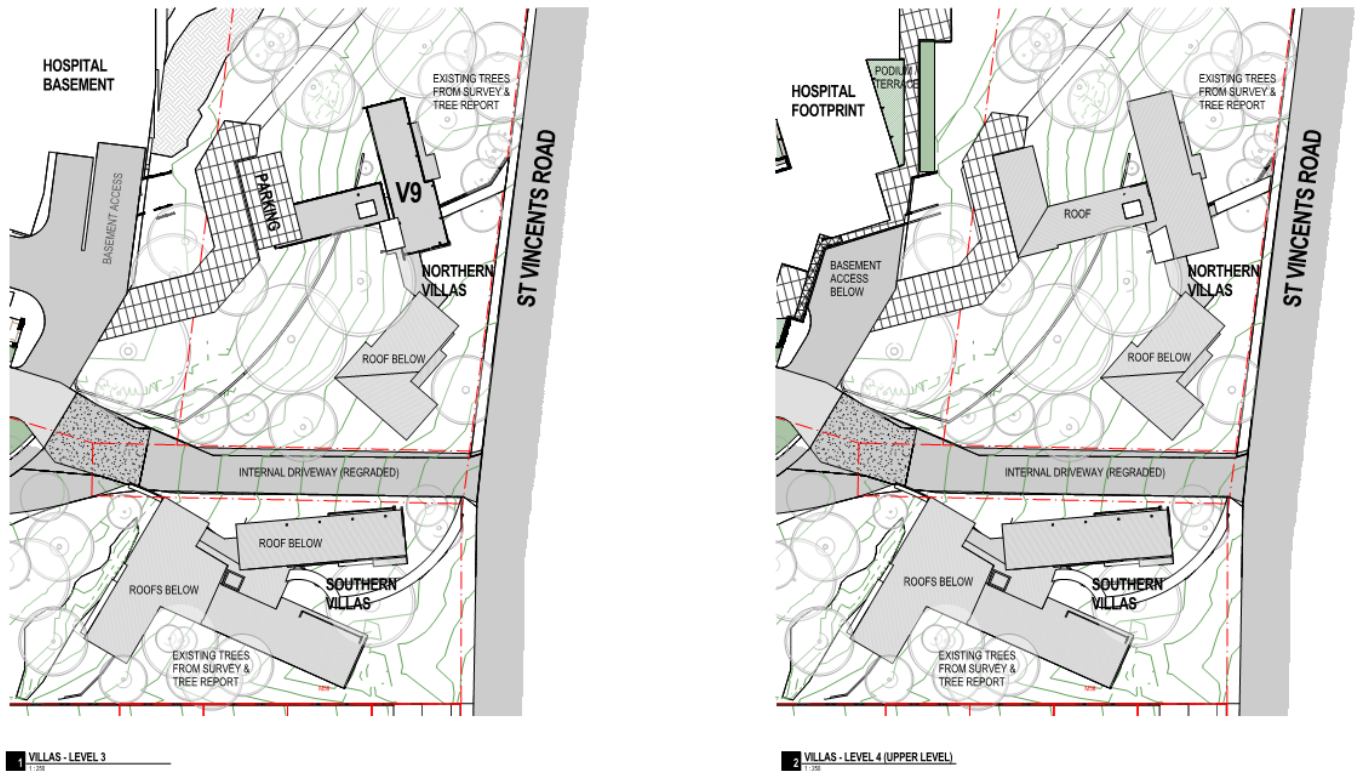


Figure 18: Seniors Living Units (Villas) Level 3-4



Figure 19: Seniors Living Units (Villas) 3D Perspective

4.3.2 Pallister House

Pallister currently houses The Dementia Centre, research facilities and education services. No demolition, alterations or additions are proposed to Pallister.

The built form of the proposed development has been designed to respect and complement the heritage significance of Pallister, ensuring its ability to be appreciated and interpreted as a significant Victorian residence.

Proposed landscaping in proximity to Pallister includes design elements which support and reinforce the 'gardensque' character of the setting. These elements include increased landscaped areas, planting and pathways. The bridle path is to be conserved and reinstated where currently lost due to open ad hoc parking areas and vehicular access arrangements. It is anticipated that the immediate setting of Pallister will be improved as a result of the proposed development.

4.3.3 Landscaping

Complete Urban has prepared concept landscape plans to complement and enhance the proposed redevelopment of Greenwich Hospital campus. The landscape scheme aims to achieve continuity across the site, contribute to visual interest and amenity, retain significant trees and vegetation associated with Pallister and utilise pathways and visual connections to ensure safe pedestrian links throughout the site. Refer to Figure 20 below, which is an extract of the landscape plans.

Five (5) key landscaping zones are proposed, including:

Zone A – St Vincent's (Green)

- *Continuation of the 'bridle path' between Pallister and the corner of St Vincent and River Road;*
- *Naturalistic landscape locally occurring indigenous species, emphasis on habitat values; and*
- *Restriction of access within the fall zones of large trees.*

Zone B – Pallister (Orange)

- *A clear path to the corner in memory of the 'bridle path';*
- *Softer, less structured around Pallister; and*
- *More confined areas of pavement generally, especially on the south-eastern approach to Pallister.*

Zone C - Riparian Embankment and Road Verge (Purple)

- *A possible gabion retaining system to reduce gradients;*
- *Planting with low volatility species - rainforest community re-establishment; and*
- *Maintenance / walking access tracks and rest places.*

Zone D – River Road Frontage (Red)

- *Clarity of entrance points;*
- *Privacy to courtyard;*
- *Tree and shrub planting to contain scale of buildings;*
- *Sensitivity in detail to northern sun access; and*
- *Clear territoriality definition.*

Zone E – Seniors Podium Courtyard (Blue)

- *Activity space;*
- *Shelter, facilities, easy access; and*
- *Gardening opportunities*



Figure 20: Extract from concept landscape plans

4.3.4 Access, Car Parking and On-site Circulation

Proposed access, car parking and on-site circulation associated with the proposed development includes:

- Retaining the two existing driveway access points from River Road and St Vincent's Road;
- Emergency parking for ambulances near the main hospital entrance;
- Basement car park;
- Maintaining pedestrian access at the corner of River Road and St Vincent's Road;
- Reinstating the historic bridle path that runs diagonally from the north east corner of the site to Pallister House; and
- Establish pedestrian entries adjacent to the driveways on both River Road and St Vincent's Road.

A traffic and parking impact assessment has been prepared and is included in Appendix G.

4.3.5 Common Facilities

The proposed development will deliver a range of common facilities for shared use on the campus between the various precincts of the hospital, including aged care, seniors living units, outpatients, visitors and the wider community. The following facilities are accessible from the main entry and provide an interface with the broader community:

- Cafe;
- Hydrotherapy pool;
- Landscaped grounds and terraced outdoor space;
- Pedestrian and vehicle access points;
- Basement car parking, including dedicated Seniors living parking;
- Goods received and collection areas; and
- Main reception area.

4.3.6 Civil Engineering Works

A concept stormwater management plan has been prepared detailing stormwater improvements to the site to accommodate the proposed buildings. Refer to Appendix I.

The site has a total catchment area of approximately 3.376ha. The topography of the site falls from River Road towards both the south-eastern and south-western corners of the property. The south-western part of

the site falls steeply away towards Gore Creek. An existing concrete dish drain intercepts storm water runoff along part of the western boundary of the site. An existing 750mm diameter storm water pipe and overland flow path convey storm water from the site to Gore Creek.

This report recommends the following water sensitive urban design measures to provide water quality and quantity control of storm water discharge from the proposed development:

- Proposed buildings located on Lot 3 DP584287 and Pallister House – Installation of rainwater re-use tank/s, an on-site detention system and a cartridge stormwater filter system to provide water quality; and
- Proposed Seniors living units located on Lot 4 DP684287 – Installation of combined OSD and rainwater reuse tanks to facilitate the storage and treatment of stormwater on-site and the installation of low maintenance rain gardens where possible to capture and treat hard surface stormwater runoff.

It is considered that the proposed redevelopment of Greenwich Hospital campus is capable of incorporating appropriate stormwater devices to provide acceptable levels of water quality and maintain pre-development site discharge. Further information will be provided as part of the subsequent, detailed development application.

4.3.7 Signage

Signage will be designed in accordance with the relevant standards and will form part of the detailed development application. It is anticipated that signage will be integrated with the building design and will assist the public in identifying the use of the development and various facilities in an unobtrusive manner.

4.3.8 Operational Details

HammondCare will continue to manage Greenwich Hospital campus and services will operate 24 hours, 7 days a week. The proposal will result in additional employment opportunities for the local community, including opportunities during construction for local tradespeople and business and long-term professional roles for approximately 174 staff. A detailed operational management plan and summary of ancillary services will be provided in the subsequent detailed development application.

4.4 Construction Management and Staging

The proposed development will be constructed in accordance with a Construction Management Plan, which will accompany the detailed development application. The Construction Management Plan will seek to minimise disturbances to surrounding developments and the amenity of the area during the demolition, excavation and construction phases.

The proposed development will be staged in construction to facilitate the continued use of the hospital and associated facilities. The general stages of development are summarised in section 10.3 of this EIS.

4.5 Capital Investment Value

The estimated capital investment value for the proposed development is \$141.5M as outlined below. A detailed cost report has been prepared by Slattery Quantity Surveyors and is included in Appendix F.

Hospital and Health Facilities	\$72,465,000
Seniors Living Units	\$69,035,000
CAMPUS TOTAL	\$141,500,000

4.6 Analysis of Feasible Alternatives

Schedule 2 Clause 7(c) requires that the EIS considers feasible alternatives and consequences of not carrying out the development. The zoning of the site, SP2 Infrastructure (Health Services Facilities) prohibits development on the subject site other than development that is ordinarily, incidental or ancillary to the development.

As detailed below, an alternate low-rise design option with equivalent GFA is included in Figure 21. For comparative purposes, an analysis of the preferred design and alternate low-rise option is provided in Table 3 below.

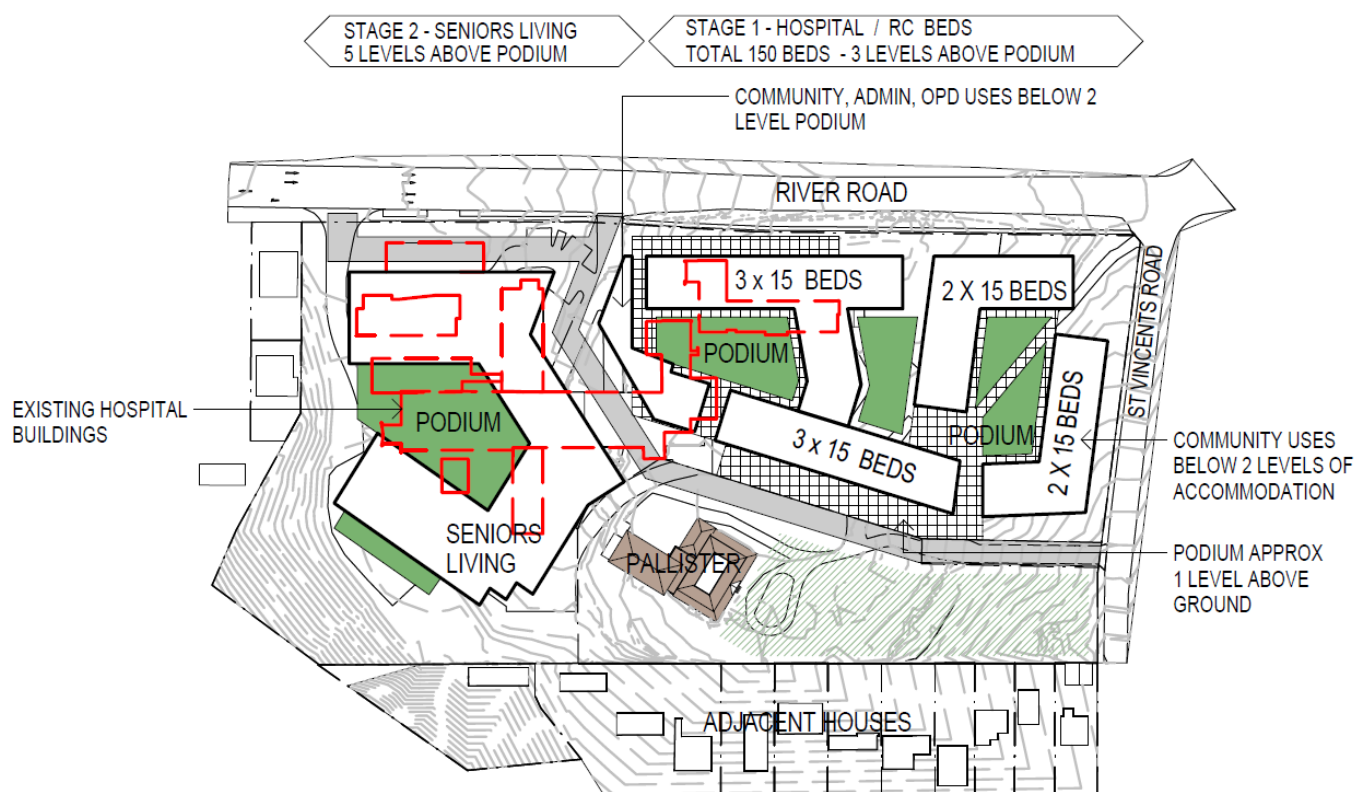


Figure 21: Alternate Design Option

Table 3: Summary of design options

KEY BENEFIT OF PREFERRED CONCEPT DESIGN	ALTERNATE DESIGN COMPARISON
Provide services that can overlap, share spaces and resources.	The layout of the site may limit opportunities to integrate services and share spaces.
Retain perimeter landscaping, leafy outlook and integrate existing vegetation.	Significant tree removal would be required to facilitate the larger building footprint.
Improve the immediate setting of Pallister, reinstate the bridle path, enhance long distance views.	Views across the site towards Pallister, the Bridle Path and heritage curtilage would be compromised.
Ensure safe pedestrian links throughout the site.	Safe and adequate pedestrian access would be compromised as a result of increased building footprints and internal road layout.
Reduce the appearance of bulk and scale through articulation, separation and setbacks.	The alternate design would result in additional bulk and scale from the streetscape and would compromise the domestic interface with St Vincents Road.

KEY BENEFIT OF PREFERRED CONCEPT DESIGN	ALTERNATE DESIGN COMPARISON
Minimise potential impacts on archaeological resources.	An increased building footprint would result in potential impacts to archaeological resources.
Minimise the likely impacts of the proposed development on biodiversity matters.	Significant vegetation removal would result in potential impacts to biodiversity matters.

It is therefore considered that the alternate design option is unsuitable for the site and may result in significant environmental risk and loss of amenity.

The preferred design option reflects HammondCare's *'Future Directions'* strategic plan and represents a high quality and innovative campus of purpose built, co-located sub-acute and residential facilities. The proposal is an opportunity to invest in and upgrade the site, as well as increase system and building service efficiencies.

Impact of Not Proceeding with the Proposal

The building fabric of Greenwich Hospital campus has reached the end of its design and useful life and is no longer suitable for best practice service delivery. HammondCare's long term goal has been to upgrade the site and deliver an innovative and integrated model of health care, consistent with HammondCare's *'Future Directions'* strategic plan. The impacts of not proceeding with the proposed development include:

- Continued under-utilisation of the site;
- Reduced access to a range of healthcare services; and
- Loss of significant, additional employment opportunities and significant community benefit.

5 Secretary Environmental Assessment Requirements

5.1 Secretary Environmental Assessment Requirements

In accordance with Section 89G of the Environmental Planning & Assessment Act 1979, the Department of Planning and Environment has issued the SEARs for consideration and preparation of this EIS. A copy of the SEARs is included in Appendix A.

Table 4 provides a detailed summary of the specific issues identified in the SEARs and where each of these requirements are addressed in this report and in accompanying consultant studies.

Table 4: Secretary Environmental Assessment Requirements

SECRETARY'S REQUIREMENTS	EIS REFERENCE
General Requirements	
Include an environmental risk assessment to identify the potential environmental impacts associated with the development.	Section 14
Provide a report from a qualified quantity surveyor detailing the capital investment value (CIV), including the applicable GST component and estimate of jobs that will be created during the construction and operational phases of the development.	Section 4.5 Appendix F
Key Issues	
1. Statutory Context <ul style="list-style-type: none"> Detail the statutory provisions applying to the concept proposal contained in all relevant environmental planning instruments; Permissibility: Detail the nature and extent of any prohibitions that apply to the development Development Standards: Identify compliance with the development standards applying to the site and provide justification for any standards that are not met; and Contamination: Demonstrate that the site is suitable for the proposed use in accordance with SEPP 55. 	Sections 6.1, 7.1 and 7.2
2. Policies and Guidelines Address the relevant planning provisions, goals and strategic planning objectives in the following: <i>NSW State Priorities, A Plan for Growing Sydney, NSW Long Term Transport Master Plan, Sydney's Bus Future 2013, Sydney's Cycling Future 2013, Healthy Urban Development Checklist, Lane Cove Development Control Plan 2010 and Greater Sydney Commission's Draft North District Plan.</i>	Sections 7.3, 8.1, 9.1 and 9.2
3. Built Form and Urban Design <ul style="list-style-type: none"> Provide a building envelope study to justify the proposed built form; Establish appropriate design guidelines and development parameters within the context of the locality, including: site layout, gross floor area, building footprints, height, massing of building envelopes, open space, landscaping and tree planting; and Provide a visual impact assessment that identifies any potential impacts on the surrounding built environment 	Section 10.1 Appendix B Appendix C Appendix D
4. Amenity Assess amenity impacts on the surrounding locality, including view impacts, overshadowing and acoustic impacts	Section 10.2 Appendix B Appendix C
5. Staging Provide details regarding the staging of the proposed development	Section 10.3 Appendix B

SECRETARY'S REQUIREMENTS	EIS REFERENCE
6. Transport and Accessibility <ul style="list-style-type: none"> Prepare a transport and accessibility impact assessment, including: vehicle, pedestrian and bicycle movements, access arrangements, road and personal safety issues, CPTED principles, car and bicycle parking, public transport availability, sustainable travel choices, service vehicle access, delivery and loading; and Address the relevant policies and guidelines, including: <i>Guide to Traffic Generating Development (RMS)</i>, <i>EIS Guidelines – Road and Related Facilities (DoPI)</i>, <i>Austroads Guide to Traffic Management Part 12: Traffic Impacts of Development</i>, <i>Cycling Aspects of Austroads Guides</i>, <i>NSW Planning Guidelines for Walking and Cycling</i>, <i>NSW Bicycle Guidelines (RMS)</i> and <i>Development Near Rail Corridors and Busy Roads – Interim Guidelines</i>. 	Section 10.4 Appendix G
7. Noise and Vibration <ul style="list-style-type: none"> Identify and provide a quantitative assessment of the main noise and vibration generating sources during operation. Outline measures and mitigate the potential noise impacts on surrounding occupiers of land; and Address the relevant policies and guidelines, including: <i>NSW Industrial Noise Policy (EPA)</i>. 	Section 10.5
8. Ecologically Sustainable Development (ESD) <ul style="list-style-type: none"> Detail how ESD principles will be incorporated in the design, construction and ongoing operation phases of the development; and Include a description of the measures that would be implemented to minimise consumption of resources, water (including water sensitive urban design) and energy. 	Section 10.6
9. Biodiversity Biodiversity impacts related to the proposed are to be assessed and documented in accordance with the Framework for Biodiversity Assessment, unless otherwise agreed by OEH, by a person accredited in accordance with s142B(1)(c) of the <i>Threatened Species Conservation Act 1995</i> .	Section 10.7 Appendix N
10. Heritage <ul style="list-style-type: none"> Provide a statement of heritage impact which identifies the following: All heritage items within and in the vicinity of the site including built heritage, landscapes and archaeology, detailed mapping of these items and why the items and site is of heritage significance; what impact the proposed works will have on their significance, including any impacts from the works, and any impacts on views to and from heritage items; and detailed mitigation measures to offset potential impacts on heritage values; and Address any archaeological potential and significance on the site and the impacts the development may have on this significance. 	Section 10.8 Appendix H
11. Aboriginal Heritage Where relevant, address Aboriginal Cultural Heritage in accordance with the Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011) and Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010.	Section 10.9 Appendix L
12. Contributions Address Council's Section 94A Contribution Plan and/or details of any Voluntary Planning Agreement.	Section 10.10
13. Flooding Assess any flood risk on site and consideration of any relevant provisions of the NSW Floodplain Development Manual (2005), including the potential effects of climate change, sea level rise and an increase in rainfall intensity.	Section 10.11

SECRETARY'S REQUIREMENTS	EIS REFERENCE
<p>14. Bushfire</p> <ul style="list-style-type: none"> • Address bushfire hazard and if required, prepare a report that addresses the requirements for Special Fire Protection Purpose Development as detailed in Planning for Bush Fire Protection 2006 guidelines; • The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Environmental Planning and Assessment Regulation 2000. Provide these as part of the EIS rather than as separate documents. In addition, the EIS must include the following: building envelope drawings, site survey plans, showing existing levels, location and height of existing and adjacent structures/buildings and boundaries, site analysis plan, stormwater concept plan, shadow diagram, view analysis, photomontages, arborist report, acoustic report and bushfire report. 	<p>Section 10.12 Appendix J</p>
Plans and Documents	
<p>The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Environmental Planning and Assessment Regulation 2000. In addition, the EIS must include the following:</p> <ul style="list-style-type: none"> • Building envelope drawings; • Site survey plan; • Site analysis plan; • Stormwater concept plan; • Shadow diagram; • View analysis/photomontages; • Arborist report; • Acoustic report; and • Bushfire report. 	<p>The plans and documents specified in this section are included in as appendices to this EIS.</p>
Consultation	
<p>During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular, you must consult with:</p> <ul style="list-style-type: none"> • Lane Cove Council; • Transport for NSW; and • Roads and Maritime Services 	<p>Section 11 Appendix O</p>

6 Federal Legislative Framework

The following section provides an overview of Federal legislative requirements applicable to the proposed development.

6.1 Federal Legislation

6.1.1 Environment Protection and Biodiversity Conservation Act 1999

The Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act) *"is the Australian Government's central piece of environmental legislation. The EPBC Act provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities and heritage places"*.

The EPBC Act requires concurrence with the Australian Government Environment Minister when a proposed development has the potential to significantly impact on a matter of national environmental significance. Approval from the minister is in addition to any relevant approvals sought under NSW legislation.

The EPBC Act identifies the following nine (9) matters of national environmental significance. A summary of impacts is provided below in Table 5 and the relevant subconsultant appendices.

- World Heritage;
- National Heritage;
- Wetlands of International Importance;
- Listed Threatened Species and Communities;
- Listed Migratory Species;
- Protection of the Environment for Nuclear Actions;
- Marine Environment;
- Great Barrier Reef Marine Park; and
- Protection of water resources from coal seam gas development and large coal mining development.

Table 5: Requirements relating to matters of national environmental significance.

EPBC ACT REQUIREMENTS	COMMENT
Subdivision A – World Heritage	Not Applicable. The subject site is not listed as or located in proximity to a world heritage item.
Subdivision AA – National Heritage	Not Applicable. The subject site is not listed as or located in proximity to a national heritage item.
Subdivision B – Wetlands of International Importance	Not Applicable. There are no RAMSAR listed wetlands located in proximity to the site.
Subdivision C – Listed Threatened Species and Communities	A Biodiversity Development Assessment Report (BDAR) has been prepared by Keystone Ecological to address the potential for threatened species and communities in proximity to the subject site. In accordance with this report, threatened species have been assessed using the Biodiversity Assessment Method (2017). Refer to Appendix N.
Subdivision D – Listed Migratory Species	It is not anticipated that the proposed development will result in any impacts on migratory species.
Subdivision E – Protection of the Environment for Nuclear Actions	Not Applicable. The proposed development will not involve any nuclear actions as defined under Clause 22 of the EPBC Act.
Subdivision F – Marine Environment	Not Applicable. The proposed development will not result in any impacts or interactions with a Commonwealth Marine Area as defined under Clause 24 of the EPBC Act.

EPBC ACT REQUIREMENTS	COMMENT
Subdivision FA – Great Barrier Reef Marine Park	Not Applicable. The proposed development is not located within proximity to the Great Barrier Reef Marine Park.
Subdivision FB - Protection of water resources from coal seam gas development and large coal mining development.	Not Applicable. The proposed development is not for a coal seam gas or large coal mining development.
Subdivision G – Additional Matters of National Environmental Significance	No additional matters of national environmental significance as defined under Subdivision G and applicable.

7 State Statutory Planning Framework

7.1 State Legislation

7.1.1 Environmental Planning and Assessment Act 1979

The Environmental Planning and Assessment Act 1979 (EP&A Act) and accompanying regulation provides the statutory framework for planning in New South Wales. The proposal is generally consistent with the objects of the act, as outlined in Section 1.3. An assessment of the proposal against the objects is provided in Table 6 below.

Section 4.36 of the EP&A Act enables State Environmental Planning Policies to declare certain developments to be State Significant Development (SSD). The proposed development is classified State Significant pursuant to Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011 due to the Capital Investment Value (CIV) exceeding the minimum threshold of \$30 Million for the component defined as 'hospital'.

Section 4.22 of the EP&A Act relates to concept development application and is therefore applicable to the proposal. In accordance with this section, no works will be carried out as part of this concept application.

Section 4.38 of the EP&A Act includes details about the consent / determination of an SSD development. Subclause (3) of this section enable development consent to be granted despite the development being partly prohibited by an environmental planning instrument. As detailed in Section 9.1 below, the Lane Cove Local Environmental Plan (LEP) prohibits the seniors living units (seniors housing) part of the proposed development, however as detailed in Section 7.2.6 the State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 is also applicable to the site and permits the seniors living units with development consent. Therefore, even though one planning instrument prohibits a portion of the development, Section 4.38(3) still enables the application to be approved.

Table 6: Assessment against objects of the EP&A Act

OBJECT OF THE ACT	COMMENT
(a) <i>to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources</i>	The proposed development will not result in any impacts to the State's natural or other resources.
(b) <i>to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment</i>	The proposed development has been designed in accordance with relevant ecologically sustainable development principles and has regard for economic, environmental and social considerations.
(c) <i>to promote the orderly and economic use and development of land</i>	The proposed development will result in significant local and regional economic benefits through the provision of high quality, integrated health care facilities and additional employment opportunities during and after construction.
(d) <i>to promote the delivery and maintenance of affordable housing</i>	The proposed development will result in additional, high quality and affordable housing for seniors, whereby residents may enter into a loan licence agreement for the duration of their stay.
(e) <i>to protect the environment, including the conservation of threatened and other</i>	A BDAR has been prepared by Keystone Ecological to consider biodiversity matters and identify protective measures to minimise the likely

OBJECT OF THE ACT	COMMENT
<i>species of native animals and plants, ecological communities and their habitats</i>	impacts of the proposed development. Refer to the impact assessment included in Appendix N for further details.
<i>(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage)</i>	An archaeological assessment and impact assessment have been prepared by GML Heritage to identify potential impacts on archaeological resources that may arise from the proposed development. The report also provides recommendations to manage and mitigate these impacts, where appropriate.
<i>(g) to promote good design and amenity of the built environment</i>	The proposed development is appropriately located and proportioned and will assist in creating visual interest and contribute to public amenity.
<i>(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants</i>	A construction and operational management plan will be provided with the detailed development application.
<i>(i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State</i>	Noted. This proposal is being assessed as State Significant Development. Lane Cove Council and relevant State agencies have been consulted as part of the EIS process and SEARs requirements.
<i>(j) to provide increased opportunity for community participation in environmental planning and assessment</i>	Community consultation was undertaken in accordance with the SEARs. Refer to Section 11.3 for details.

In accordance with Section 4.40 of the EP&A Act, the proposal has regard for the requirements of 4.15 of the EP&A Act and satisfies all relevant planning legislative requirements. Refer to Table 7 below.

Table 7: Section 4.15 Evaluation

SECTION 4.15 PROVISION	COMMENT
<i>(a) the provisions of:</i>	
<i>(i) any environmental planning instrument</i>	Relevant environmental planning instruments are addressed in Section 7.2.
<i>(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved)</i>	Not Applicable.
<i>(iii) any development control plan</i>	Clause 11(a) of State Environmental Planning Policy (State and Regional Development) 2011 excludes the application of development control plans. However, the SEAR's requested consideration of the Lane Cove DCP and a discussion is included in section 9.2.

SECTION 4.15 PROVISION	COMMENT
(iiia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4	Not Applicable.
(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph)	The Environmental Planning and Assessment Regulation 2000 and provisions of Schedule 2 are outlined in Section 7.1.2 and Table 8 below.
(v) any coastal zone management plan (within the meaning of the Coastal Protection Act 1979), that apply to the land to which the development application relates	Not Applicable.
(b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality	The proposed development has been designed with regard for potential impacts on both the natural and built environment. Appropriate mitigation measures and recommendations have been sought.
(c) the suitability of the site for the development	The proposed development is consistent with the desired future character of the area and has been designed with regard for the amenity of surrounding developments.
(d) any submissions made in accordance with this Act or the regulations	Any submissions made in accordance with the Act or regulations will be addressed in the Response to Submissions.
(e) the public interest	The public interest is best served by promoting sustainable development that is rational, orderly and economic. The proposal will generate positive social, environmental and economic benefits.

7.1.2 Environmental Planning and Assessment Regulation 2000

Schedule 2 of the Environmental Planning and Assessment Regulation 2000 outlines requirements for preparing an environmental impact statement. This environmental impact statement has been prepared in accordance with the provisions outlined in Schedule 2 Section 7, the requirements have been addressed in Table 8 below.

Table 8: Schedule 2 - Environmental Planning and Assessment Act 1979

SCHEDULE 2 CLAUSE	COMMENT
(1) An environmental impact statement must include the following:	
(a) A summary of the environmental impact statement	Section 1 and Section 2.3
(b) a statement of the objectives of the development, activity or infrastructure	Section 2.4
(c) An analysis of any feasible alternatives to the varying out of the development, activity or infrastructure, having regard to its objectives, including the consequences of not carrying out the development, activity or infrastructure	Section 4.6

SCHEDULE 2 CLAUSE	COMMENT
<p>(d) <i>An analysis of the development, activity or infrastructure, including:</i></p> <p>(i) <i>a full description of the development, activity or infrastructure, and</i></p> <p>(ii) <i>a general description of the environment likely to be affected by the development, activity or infrastructure, together with a detailed description of those aspects of the environment that are likely to be significantly affected, and</i></p> <p>(iii) <i>the likely impact on the environment of the development, activity or infrastructure, and</i></p> <p>(iv) <i>a full description of the measures proposed to mitigate any adverse effects of the development, activity or infrastructure on the environment, and</i></p> <p>(v) <i>a list of any approvals that must be obtained under any other Act or law before the development, activity or infrastructure may lawfully be carried out</i></p>	Section 4
<p>(e) <i>a compilation (in a single section of the environmental impact statement) of the measures referred to in item (d) (iv),</i></p>	Section 14.1
<p>(f) <i>the reasons justifying the carrying out of the development, activity or infrastructure in the manner proposed, having regard to biophysical, economic and social considerations, including the principles of ecologically sustainable development set out in subclause (4).</i></p>	Section 12

7.1.3 Protection of the Environment Operations Act 1997

The Protection of the Environment Operations Act 1997 is a key piece of environmental protection legislation that sets out explicit protection policies to manage, restore and enhance the quality of the NSW environment.

There are no listed activities in Schedule 1 of the Act that would be triggered by the redevelopment of Greenwich Hospital and there is no requirement for obtaining an Environment Protection Licence.

7.1.4 Biodiversity Conservation Act 2016

The Biodiversity Conservation Act 2016, together with the Biodiversity Conservation Regulation 2017 establish a framework to avoid, minimise and offset impacts on biodiversity from development through the implementation of the Biodiversity Offset Scheme.

A Biodiversity Development Assessment Report (BDAR) has been prepared by Keystone Ecological in accordance with the Biodiversity Conservation Act 2016 to assess the likely impacts of the proposed development upon important biodiversity matters. Please refer to Appendix N.

The BDAR includes recommendations for the proposed development in terms of the minimisation of any impacts and it is unlikely that there will be significant adverse impacts on the biodiversity of the site

7.1.5 Rural Bushfire Act 1997 & Planning for Bushfire Protection

The subject site has been identified on Lane Cove Council's Bushfire Prone Lane Map as containing category 2 vegetation and is located within a 30m buffer zone of designated category 2 vegetation. A bushfire hazard assessment report has been prepared by Building Code & Bushfire Hazard Solutions and is included in Appendix J. The purpose of this report is to provide independent bushfire hazard determination together with appropriate recommendations and mitigation measures.

Refer to section 10.12 (SEAR 14) for details on bushfire recommendations.

7.1.6 Contaminated Land Management Act 1997

The general object of this Act is to establish a process for investigating and (where appropriate) remediating land that the EPA considers to be contaminated significantly enough to require regulation under Division 2 of Part 3. Land contamination that is not deemed significant enough to be regulated by the EPA can be handled under the planning and development framework, including State Environmental Planning Policy No. 55 - Remediation of Land and the Managing Land Contamination - Planning Guidelines.

A contamination assessment has been prepared in the form of a preliminary site investigation, prepared by Douglas Partners, included in Appendix P, which concluded:

On the basis of the results of this Preliminary Site Investigation, the risk of significant contamination being present on the site is considered to be low. The possible presence of a UST should be investigated because a disused UST that has not been properly abandoned may present a future risk as it deteriorates. Further guidance on USTs is provided in Guidelines for Implementing the Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2008.

It is noted that a Detailed Site Investigation incorporating intrusive sampling should be undertaken to fully characterise the contamination status of the site, if such characterisation is required. However, on the basis of the investigation undertaken to date it is considered that the risk of significant contamination being present, that prevents the redevelopment of the site, is low. As such, this Preliminary Site Investigation should be sufficient for master planning purposes with more detailed investigations carried out for each of the future redevelopment stages.

A Hazardous Building Materials Assessment is suggested prior to any demolition works to identify hazardous materials (e.g. lead based paint, asbestos etc.) so that demolition works can be planned and executed appropriately. This assessment does not need to be undertaken until demolition works are proposed (i.e. during each future stage of the development).

Any materials required to be removed from the site will need to be classified in accordance with the current Waste Classification Guidelines (NSW EPA, 2014).

It should be noted that a hazardous materials risk assessment can be provided with the subsequent development application for demolition and construction.

7.1.7 Water Management Act 2000

Under Part 3 of Chapter 3 a person must obtain a permit for water use approval, water management work approval or activity approval.

The NSW Department of Primary Industries Office of Water advised during the consultation process that further information on the possible interference of groundwater should be provided with the subsequent detailed development application if excavation works are likely to impact on groundwater.

A Water Licence is required from the NSW Office of Water if the works take more than 3ML of groundwater.

A preliminary geotechnical assessment has been prepared by Jeffery and Katauskas (JK) and is included in Appendix K. The preliminary geotechnical assessment confirms the following:

"We expect that groundwater may flow along the top of the sandstone bedrock surface or along bedding partings or joint planes within the sandstone bedrock, particularly following periods of heavy or prolonged rainfall. The groundwater seepage should be monitored during bulk excavation so that any unexpected conditions, which may be revealed, can be incorporated into the drainage design. In the long term we would recommend that drains be constructed around the basement excavation to collect all groundwater inflow and discharge this at the lower end of the site."

Further geotechnical and stormwater drainage investigations will be provided with the subsequent detailed development application.

7.1.8 Heritage Act 1977

As detailed in Part 1 of the Heritage Act 1977, the objects of this act aim to identify, understand, conserve and protect items of State heritage significance. Lot 4 DP 584287 contains a two-storey late Victorian house known as 'Pallister' and grounds. 'Pallister' is listed as state heritage item SHR 00574 and therefore the provisions of the Heritage Act 1977 are applicable.

It should be noted that no demolition, alterations or additions are proposed to Pallister, however a statement of heritage impact has been prepared by NBRS Architecture to consider the suitability of proposed works in proximity to Pallister and within the heritage curtilage.

The statement of heritage impact confirms that the concept proposal is acceptable from a heritage perspective and provides the following recommendations:

R1 – That should future changes be contemplated for the Pallister building, that the 2004 Conservation Management Plan be updated to reflect subsequent changes to the place.

R2 – That any archaeological evidence uncovered in relation to the bridle path during the course of the project be included in the updated CMP.

R3 – That a suitable qualified heritage landscape consultant be commissioned to detail and specify appropriate garden plantings, edging and paving materials to the immediate setting of the heritage item for inclusion.

R4 – That as part of any consent the preparation of a construction management plan that specifically identifies all protective, managing and monitoring systems and strategies for Pallister be prepared and that it is approved by the consent authority prior to work commencing. This CMP is to be reviewed by the heritage consultant and any feedback implemented as required.

The consent authority should have no hesitation in approving this application from a heritage perspective.

Refer to Section 10.8 of this EIS and Appendix H for further details.

7.1.9 Roads Act 1993

Section 138 of the NSW Roads Act 1993 requires the consent of the appropriate roads authority for any works or activities in a public road reserve.

The site is bounded by River Road to the north (classified road managed by Roads and Maritime Services) and St Vincent's Road to the east (local road managed by Lane Cove Council).

Some minor reconfiguration of the two existing vehicle crossovers on River Road and one existing vehicle crossover on St Vincent's Road may be required subject to further investigations at the subsequent detailed development application. Upgrades to the footpaths along River Road and St Vincent's Road are also proposed. As these works form part of the detailed development application, no further consideration of section 138 is required as part of this concept application.

7.1.10 National Parks & Wildlife Act 1974

The National Parks and Wildlife Act 1974 (NP&W Act) details requirements for the management of Aboriginal Heritage in NSW. Where Aboriginal objects maybe subject to impact from a State Significant Development (SSD) such as this, there is no requirement for an Aboriginal Heritage Impact Permit (AHIP) under Section 90 of the NP&W Act. There are however requirements from the Secretary General (SEARs) that require detailed assessment of Aboriginal cultural heritage on the site including appropriate consultation and the development of an agreed protocol for management of Aboriginal objects should they be located during construction.

An Aboriginal Cultural Heritage Assessment was prepared by Cultural Heritage Connections and is included in Appendix R.

7.2 State Environmental Planning Policies

7.2.1 State Environmental Planning Policy (State and Regional Development) 2011

Clause 8 of the State and Regional Development SEPP identifies development that is declared to be State significant. The clause refers to development included in Schedule 1 in subclause (1)(b) and in subclause (2) it allows development that may not be usually State significant to be declared under subclause (1) so long as the development is sufficiently related to the State significant development.

In accordance with schedule 1 clause 14 of the State and Regional Development SEPP the proposed development is classified as State significant development because it is predominantly a hospital as defined below:

- 14 *Hospitals, medical centres and health research facilities*
Development that has a capital investment value of more than \$30 million for any of the following purposes:
- (a) *hospitals,*
 - (b) *medical centres,*
 - (c) *health, medical or related research facilities (which may also be associated with the facilities or research activities of a NSW local health district board, a University or an independent medical research institute).*

The proposed development is predominantly a hospital campus with a main hospital facility that includes inpatient hospital beds, palliative care beds, residential care beds and outpatient services. The associated seniors living units are an integral part of the hospital campus and the HammondCare 'continuum of care' model. All the hospital facilities will share common services and facilities. The hospital campus meets the Capital Investment Value (CIV) threshold of \$30 Million for the specific 'hospital' precinct and is therefore classified as a State Significant project, under clause 14 of Schedule 1 along with the supporting and associated development.

The CIV of the proposed development is outlined in correspondence from Slattery Quantity Surveyors, refer Appendix F. The breakdown of costs is summarised below.

Hospital & Health Facilities	\$72,465,000
Seniors Living Units	\$69,035,000
CAMPUS TOTAL	\$141,500,000

As mentioned above, HammondCare's vision for the site is to provide an integrated health care facility primarily focussed on palliative care, rehabilitation and older persons mental health. The integration of aged care and seniors living units and facilities are consistent with the specialised nature of the hospital and HammondCare's 'continuum of care' model. The integration of shared spaces will improve efficiencies across the site and allow dual use of facilities and services and most importantly provide resident / patient benefits such as aging in place and the ability to house couples on-site in different care levels if or when the need arises. HammondCare have well established campuses at Miranda and Hammondville where they are able to provide a similar level of services that are proposed for Greenwich.

7.2.2 State Environmental Planning Policy (Infrastructure) 2007

SEPP Infrastructure 2007 relates to development for the provision of infrastructure services, such as hospitals and related facilities by both public and private entities.

Division 10 of SEPP Infrastructure 2007 relates to Health services facilities and provides definitions and requirements for development permissible with and without consent. Under Division 10 Clause 56 of the SEPP, health service facility is defined as (same meaning as the Standard Instrument):

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 the following:

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

Division 10 Clause 57 of the SEPP outlines that development for the purpose of health services facilities may be carried out by any person with consent on land in a prescribed zone. The site is located within the SP2 Health Service Facility zone, which is listed as a prescribed zone under Clause 56 of the SEPP. It should be noted that the land surrounding the site is zoned R2 and the health service facilities are also permissible with consent in that zone.

A 'hospital' is further defined as:

hospital means a building or place used for the purpose of providing professional health care services (such as preventative or convalescent care, diagnosis, medical or surgical treatment, psychiatric care or care for people with disabilities, or counselling services provided by health care professionals) to people admitted as in-patients (whether or not out-patients are also cared for or treated there), and includes ancillary facilities for (or that consist of) any of the following:

- (a) day surgery, day procedures or health consulting rooms,
- (b) accommodation for nurses or other health care workers,
- (c) accommodation for persons receiving health care or for their visitors,
- (d) shops, kiosks, restaurants or cafes or take away food and drink premises,
- (e) patient transport facilities, including helipads, ambulance facilities and car parking,
- (f) educational purposes or any other health-related use,
- (g) research purposes (whether or not carried out by hospital staff or health care workers or for commercial purposes),
- (h) chapels,
- (i) hospices,
- (j) mortuaries.

The hospital and ancillary uses, as the main use / precinct on the site is therefore permissible with development consent through the State Significant development process. Refer to Section 7.2.6 below in relation to further permissibility clarifications.

Schedule 3 of the SEPP outlines traffic generating development to be referred to RMS for consideration. The threshold for referral is hospitals with 200 or more beds directly accessed to any road, hospitals with 100 or more beds with direct access or within 90m of a classified road and car parking for 200 or more motor vehicles. The hospital has less than 100 beds, however the overall development (hospital and seniors combined) will have 200 beds in total and total car parking will exceed 200 spaces. This application will therefore be referred to RMS for consideration. To assist with this, a traffic and parking impact assessment report has been prepared and is included in Appendix G.

7.2.3 State Environmental Planning Policy 65 – Design Quality of Residential Apartment Development

SEPP 65 applies to certain development for the purpose of a residential flat building, shop top housing or mixed-use development with a residential accommodation component. The seniors living units (Seniors housing) are not listed as being considered under SEPP 65, however the proposal has been designed with regard for SEPP 65 and the nine design quality principles:

- Context and neighbourhood character;
- Built form and scale;
- Density;
- Sustainability;
- Landscape;
- Amenity;
- Safety;
- Housing diversity and social interaction; and
- Aesthetics.

A design statement referencing these principles has been prepared by the architects Bickerton Masters and is included as Appendix C. The proposal addresses the context of the site and the main elements of landscaping and slope. It references important views and vistas and will respond to these appropriately. Appropriate colours and materials have been recommended to ensure the mass of the buildings can be broken up to reduce their bulk and scale.

7.2.4 State Environmental Planning Policy No.55 – Remediation of Land

Clause 7 of State Environmental Planning Policy No.55 – Remediation of Land requires the consent authority to consider whether land is contaminated during the development application process.

It is proposed to continue use of the site as a hospital with a focus on rehabilitation and palliative care.

A contamination assessment has been prepared by Douglas Partners in the form of a preliminary site investigation. This report is included in Appendix P and concluded:

On the basis of the results of this Preliminary Site Investigation, the risk of significant contamination being present on the site is considered to be low. The possible presence of a UST should be investigated because a disused UST that has not been properly abandoned may present a future risk as it deteriorates. Further guidance on USTs is provided in Guidelines for Implementing the Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2008.

It is noted that a Detailed Site Investigation incorporating intrusive sampling should be undertaken to fully characterise the contamination status of the site, if such characterisation is required. However, on the basis of the investigation undertaken to date it is considered that the risk of significant contamination being present, that prevents the redevelopment of the site, is low. As such, this Preliminary Site Investigation should be sufficient for master planning purposes with more detailed investigations carried out for each of the future redevelopment stages.

A Hazardous Building Materials Assessment is suggested prior to any demolition works to identify hazardous materials (e.g. lead based paint, asbestos etc.) so that demolition works can be planned

and executed appropriately. This assessment does not need to be undertaken until demolition works are proposed (i.e. during each future stage of the development).

Any materials required to be removed from the site will need to be classified in accordance with the current Waste Classification Guidelines (NSW EPA, 2014).

It should be noted that a hazardous materials risk assessment can be provided with the subsequent development application for demolition and construction.

The risk of significant contamination on the site is low and detailed assessment, if required will be undertaken for detailed applications.

7.2.5 State Environmental Planning Policy No.33 – Hazardous and Offensive Development

State Environmental Planning Policy No.33 – Hazardous and Offensive Development seeks to ensure that in considering any application to carry out potentially hazardous or offensive development, the consent authority has sufficient information to assess whether the development is hazardous or offensive and to impose conditions to reduce or minimise any adverse impact.

The redeveloped hospital will continue to run in a similar manner as the existing hospital and no substantive changes to operational procedures or the materials stored on site are anticipated. Materials stored on the site include: medical consumables, pharmaceutical supplies, fresh, dry and frozen foods, clean linen, soiled linen, contaminated waste, general waste, oxygen in cylinders, garden and maintenance supplies.

7.2.6 State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004

The State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (Seniors Housing SEPP) applies to the proposed aged care part of the hospital and health facilities precinct and seniors living units as part of the associated development precinct. The development will need to have regard for the provisions of the Seniors Housing SEPP and the aims which are:

- (1) This Policy aims to encourage the provision of housing (including residential care facilities) that will:
 - (a) increase the supply and diversity of residences that meet the needs of seniors or people with a disability, and
 - (b) make efficient use of existing infrastructure and services, and
 - (c) be of good design.
- (2) These aims will be achieved by:
 - (a) setting aside local planning controls that would prevent the development of housing for seniors or people with a disability that meets the development criteria and standards specified in this Policy, and
 - (b) setting out design principles that should be followed to achieve built form that responds to the characteristics of its site and form, and
 - (c) ensuring that applicants provide support services for seniors or people with a disability for developments on land adjoining land zoned primarily for urban purposes.

Table 9 confirms permissibility of the proposal and compliance with the relevant provisions of the SEPP.

Table 9: State Environmental Planning Policy (Housing for Seniors or People with a Disability) Provisions

SEPP REQUIREMENT	COMMENT
Chapter 1 Preliminary	
1 Name of Policy	Noted.
2 Aims of Policy	The proposal is consistent with the aims of the policy in that it will provide additional housing for seniors within close proximity to appropriate services and facilities.
3 Interpretation	Noted.

SEPP REQUIREMENT	COMMENT
4 Land to which Policy applies	This policy applies to land that is primarily zoned for urban purposes or land that adjoins land primarily zoned for urban purposes but only if specific uses are permitted on the land including hospitals. This site is zoned SP2 Infrastructure Zone (Health Services Facility) and adjoins land zoned R2 Low Density Residential – both of which are predominantly urban in nature and permit hospitals as a use with consent. Therefore, the SEPP applies to this site as it is both primarily zoned for urban purposes and adjoins land primarily zoned for urban purposes.
5 Relationship to other environmental planning instruments	Noted.
6 Transitional provisions relating to certain development applications and development	Not applicable.
7 Suspension of certain agreements and covenants	Noted.
Chapter 2 Key Concepts	
8 - 13	Noted. Although a number of these uses specifically advise they are not "hospitals" there is nothing that stops them from being ancillary or associated with a hospital as they are in this case and part of the HammondCare 'continuum of care' model. The proposed form of seniors housing fits the classification of 'serviced self-care housing under clause 13(3) which is defined as: <i>"In this Policy, served self-care housing is seniors housing that consists of self-contained dwellings where the following services are available on the site: meals, cleaning services, personal care, nursing care"</i>
Chapter 3 Development for Seniors Housing	
Part 1 General	
14 Objective of chapter	Noted.
15 What chapter does	Noted.
16 Development consent requirements	Noted, development consent is required.
17 Development on land adjoining land zoned primarily for urban purposes	Not Applicable as the site is foremost primarily zoned for urban purposes.
18 Restrictions on occupants of seniors housing allowed under this chapter	Noted.
19 Use of seniors housing commercial zones	Not applicable.
20 Repealed	
21 Subdivisions	Not applicable, no subdivision is proposed as part of this application.
22 Fire sprinkler systems in residential care facilities for seniors	Not applicable to this application.
23 Development on land used for the purposes of an existing registered club	Not applicable, this application does not include a registered club.
Part 1A Site Compatibility Certificate	

SEPP REQUIREMENT	COMMENT
24 Site compatibility certificates requires for certain development applications	A site compatibility certificate is not required as the site is zoned "special uses" and development for the purposes of a hospital is permitted with consent under the LEP and SEPP (Infrastructure).
25 Application for site compatibility certificate	Not applicable.
Part 2 Site-related Requirements	
26 Location and access to facilities	<p>The seniors living component will be integrated into the Greenwich Hospital campus redevelopment with shared access to all services and facilities on-site between the hospital, residential care and seniors living units. These facilities include access to health facilities, meals, cleaning, recreational areas, hydrotherapy pool, café and other facilities all within the grounds of the redeveloped Greenwich Hospital campus.</p> <p>In addition to the services provided on-site, regular bus services are available at the sites River Road frontage for connection to a range of services and facilities.</p> <p>Bus route 261 arrives/departs from the site approximately every half hour and connects the site with larger centres such as Crows Nest, North Sydney, Wynyard and King Street Wharf, which provide convenient access to services such as banks, retail outlets, community services, recreational facilities and specialist medical practitioners.</p> <p>Level access in accordance with clause 26 requirements is available to and from the bus stop at the site frontage and to the bus stops mentioned above. In particular, level access is available at the North Sydney Station 5 Blue Street bus stop which provides railway connections to areas outside of bus route 261 if required.</p>
27 Bush fire prone land	<p>The site is identified as being bush fire prone land and will need to comply with the requirements of this provision. A bushfire hazard assessment report has been prepared by Building Code & Bushfire Hazard Solutions and is included in Appendix J. The purpose of this report is to provide independent bushfire hazard determination together with appropriate recommendations and mitigation measures.</p> <p>Further details can be provided in the future development application stage.</p>
28 Water and sewer	A stormwater management plan has been prepared in accordance with this section and is included in Appendix I. The site is serviced by water and wastewater and details can be provided with the detailed development applications.
29 Consent authority to consider certain site compatibility criteria for development applications to which clause 24 does not apply	The proposal has considered the potential for impacts on the natural environment, services, infrastructure, and character and amenity of the locality. The proposal has been located in close proximity to existing services and additional / upgraded medical facilities will also be provided on-site. The existing infrastructure will have capacity to cater for the increased development and details will be provided with the detailed development application.
Part 3 Design Requirements	

SEPP REQUIREMENT	COMMENT
Division 1 General	
30 Site Analysis	<p>The proposed development has been designed with regard for visual amenity, landscape character, scenic quality and will not adversely impact on the views and solar access of neighbouring developments.</p> <p>A site analysis plan is included in the concept architectural plans prepared by Bickerton Masters Architecture, refer Appendix B.</p> <p>In addition, the proposal is consistent with the design principles specified in Division 2.</p>
31 Design of in-fill self-care housing	Not Applicable.
32 Design of residential development	<p>Complies.</p> <p>The proposal is consistent with the design principles specified in Division 2 as detailed below.</p>
Division 2 Design Principles	
33 Neighbourhood amenity and streetscape	The proposal includes retention of significant trees, varying setbacks, building orientations and generous separation to reduce the appearance of bulk and scale and preserve levels of privacy, sunlight and visual amenity that are enjoyed by neighbouring dwellings.
34 Visual and acoustic privacy	<p>The concept proposal has been architecturally designed to protect the amenity and privacy of nearby residential developments through varying setbacks, landscaped areas, built form and separation.</p> <p>The existing hospital arrangements and activities will continue, although upgraded and seniors living units and aged care will not generate intrusive noise. An acoustic report has been prepared and is included in Appendix Q.</p>
35 Solar access and design for climate	The future seniors living units will have good solar orientation and cross ventilation. The subsequent detailed development application will include a BASIX report confirming compliance with passive solar design and water and energy conservation.
36 Stormwater	A concept stormwater management plan has been prepared and is included in Appendix I. Detailed plans will be included with the future development application.
37 Crime Prevention	A crime prevention through environmental design report (CPTED) can be provided as part of the subsequent detailed development application.
38 Accessibility	The architectural concept proposals have considered mobility requirements for residents across the site. The integrated built form with connecting walkways and lifts will enable future aged care residents to traverse the site and access public transport in accordance with accessibility guidelines. An Access report can be submitted with the future detailed development application.
39 Waste Management	A Waste Management Plan will be submitted with the future detailed development applications.
Part 4 Development Standards to be complied with	
Division 1 General	

SEPP REQUIREMENT	COMMENT		
40 Development standards – minimum size and building height	The proposal has regard for the following development standards.		
	Standard	Control	Compliance
	Site size	At least 1,000m ²	Complies. The site has an area of approximately 3.376ha
	Site frontage	At least 20 metres at the building line	The site frontages to River Road and St Vincent's Road substantially exceed this requirement.
	Height in residential zones where residential flat buildings are not permitted	Less than 8 metres	The site is not within a residential zone and therefore this standard is not applicable.
Division 2 Residential care facilities – standards concerning accessibility and useability			
Note. Development standards concerning accessibility and useability for residential care facilities are not specified in this Policy. For relevant standards, see the Commonwealth aged care accreditation standards and the Building Code of Australia	Noted. Compliance with these provisions can be provided following detailed design.		
Division 3 Hostels and self-contained dwellings – standards concerning accessibility and useability			
41 Standards for hostels and self-contained dwellings	The proposal has regard for the development standards specified in Schedule 3.		
Part 5 Development on Land Adjoining Land Zoned Primarily for Urban Purposes			
42 - 44 Serviced self-care housing	Not applicable.		
Part 6 Development for Vertical Villages			
45 Vertical Villages	Not applicable.		
Part 7 Development Standards that cannot be used as Ground to Refuse Consent			
It is noted that the below standards cannot be used to refuse development consent for self-contained dwellings.			
Standard	Provisions	Comment	
a) Building height	If all proposed buildings are 8m or less in height	Clause 4.3 of the Lane Cove LEP and associated mapping confirms that no maximum building height has been adopted for the site. The approximate, maximum building heights are:	

SEPP REQUIREMENT		COMMENT
		Hospital - RL 80.0 Seniors housing (Apartments) - RL 65.0 Seniors housing (Villas) - RL 55.0
b) Density and scale	If the density and scale of the buildings when expressed as a floor space ratio is 0.5:1 or less	The proposed development has a floor space ratio of 0.837:1. Clause 4.4 of Lane Cove LEP and associated mapping confirms that no maximum FSR has been adopted for the site.
c) Landscape area	(i) in the case of a development application made by a social housing provider-a minimum 35 square metres of landscaped area per dwelling is provided, or (ii) in any other case-a minimum of 30% of the area of the site is to be landscaped	Complies. Refer to landscape plans included in Appendix D.
d) Deep soil zones	if, in relation to that part of the site (being the site, not only of that particular development, but also of any other associated development to which this Policy applies) that is not built on, paved or otherwise sealed, there is soil of a sufficient depth to support the growth of trees and shrubs on an area of not less than 15% of the area of the site (the "deep soil zone")	Approximately 12,000m ² (35%) Refer to landscape plans included in Appendix D.
e) Solar access	if living rooms and private open spaces for a minimum of 70% of the dwellings of the development receive a minimum of 3 hours direct sunlight between 9am and 3pm in mid-winter	Can comply – details to be provided and assessed as part of the detailed development application.
f) Private open space	for in-fill self-care housing, if: (i) in the case of a single storey dwelling or a dwelling that is located, wholly or in part, on the ground floor of a multi-storey building, not less than 15 square metres of private open space per dwelling is provided and, of this open space, one area is not less than 3 metres wide and 3 metres long and is accessible from a living area located on the ground floor, and	Can comply – details to be provided and assessed as part of the detailed development application.

SEPP REQUIREMENT	COMMENT
	(ii) in the case of any other dwelling, there is a balcony with an area of not less than 10 square metres (or 6 square metres for a 1 bedroom dwelling), that is not less than 2 metres in either length or depth and that is accessible from a living area,
h) Parking	if at least the following is provided: (i) 0.5 car spaces for each bedroom where the development application is made by a person other than a social housing provider, or (ii) 1 car space for each 5 dwellings where the development application is made by, or is made by a person jointly with, a social housing provider Can comply – details to be provided and assessed as part of the detailed development application.

Based on the above assessment, housing pursuant to the SEPP is permissible with development consent and the detailed compliance will be provided with the detailed development application.

7.2.7 State Environmental Planning Policy No.19 – Bushland in Urban Areas

State Environmental Planning Policy No.19 – Bushland in Urban Areas relates to the protection and preservation of bushland in urban areas that is considered of value. Section 9 of the SEPP includes a list of issues that Council must consider before granting approval for development adjoining land zoned or reserved for public open space. The site adjoins Gore Hill Reserve to the south west, which is mapped as SEPP 19 bushland and includes the riparian corridor of Gore Creek, therefore the following issues will need to be considered:

- (c) *the need to retain any bushland on the land,*
- (d) *the effect of the proposed development on bushland zoned or reserved for public open space purposes and, in particular, on the erosion of soils, the siltation of streams and waterways and the spread of weeds and exotic plants within the bushland, and*
- (e) *any other matters which, in the opinion of the approving or consent authority, are relevant to the protection and preservation of bushland zoned or reserved for public open space purposes.*

A small area of bushland to the south west of the site along Gore Creek has been mapped as bushland under SEPP No 19. The existing development currently includes hard stand areas about 30 metres upslope from the bushland and the proposed development will continue to provide a buffer distance of potentially more than 30 metres from the bushland which would increase the buffer.

The proposal will therefore not have a significant adverse impact on the adjoining bushland area and can be appropriately managed. Further details about potential impacts on bushland and flora and fauna are provided in the BDAR provided in Appendix N.

7.2.8 State Environmental Planning Policy No. 64 – Advertising and Signage

Clause 8 of State Environmental Planning Policy No. 64 – Advertising and Signage states:

"A consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied:

- (a) that the signage is consistent with the objectives of this Policy as set out in clause 3 (1) (a), and
- (b) that the signage the subject of the application satisfies the assessment criteria specified in Schedule 1."

Signage will be designed in accordance with the relevant standards and will form part of the detailed development application. It is anticipated that signage will be integrated with the building design and will assist the public in identifying the use of the development and various facilities in an unobtrusive manner.

7.2.9 Sydney Regional Environmental Plan (SREP) (Sydney Harbour Catchment (SHC)) 2005 (Deemed SEPP)

SREP Sydney Harbour Catchment 2005 covers the area of Sydney Harbour, including Parramatta River and its tributaries and the Lane Cove River and includes planning principles and controls for the catchment area.

Aims of the SREP include:

- (a) to ensure that the catchment, foreshores, waterways and islands of Sydney Harbour are recognised, protected, enhanced and maintained:
 - (i) as an outstanding natural asset, and
 - (ii) as a public asset of national and heritage significance, for existing and future generations,
- (b) to ensure a healthy, sustainable environment on land and water,
- (c) to achieve a high quality and ecologically sustainable urban environment

The subject property is located within the Sydney Harbour Catchment therefore the provisions of this plan apply to this development. An assessment of the proposal against relevant matters for consideration is provided below.

Table 10: Compliance with SREP (SHC) 2005

MATTERS FOR CONSIDERATION	ASSESSMENT
21 Biodiversity, ecological and Environmental protection	<p>As the site is already mainly developed, the potential for impact on the catchment is low. Areas of ecological sensitivity (particularly in the south-western corner of the site adjacent to Gore Creek) will be conserved and rehabilitated.</p> <p>The preliminary stormwater management report included as Appendix I recommends a number of stormwater controls to maintain discharge rates and maintain water quality. These measures include:</p> <ul style="list-style-type: none"> • erosion and sediment controls during construction; • Runoff from roof areas will be directed to rainwater tanks for reuse on site; • Runoff from ground level impervious areas will be directed to a cartridge stormwater filter system to provide water quality treatment prior to discharge to onsite detention tanks • Additional litter and sediment removal will be provided within the onsite detention tanks via a debris screen and sediment control sump.
22 Public Access to, and use of, Foreshore and waterways	<p>The subject site is not adjacent to the foreshore or waterways, as such it will not impact access to the foreshore. This clause is not applicable to the development.</p>

MATTERS FOR CONSIDERATION	ASSESSMENT
23 Maintenance of a working harbour	The subject site is not adjacent to the foreshore, commercial or industrial lands or the working harbour. As such it will not impact the working harbour. This clause is not applicable to the development.
24 Interrelationship of waterway and foreshore uses	The subject site is not adjacent to the foreshore or waterways, as such it will not impact access to the foreshore. This clause is not applicable to the development.
25 Foreshore and waterways scenic quality	The proposal is not visible from the Sydney Harbour foreshore and will not impact on the scenic qualities of Sydney Harbour.
26 Maintenance, protection and enhancement of views	The development will not adversely impact views to or from the waterfront, any public places, landmarks and heritage items. Photo montage visual analysis by Bickerton Masters Architecture, refer Appendix B, confirms that the leafy setting of the site will be maintained, and the new buildings will be substantially screened from view from residential areas and the public domain.
27 Boat storage facilities	The proposed development is not on the waterfront and does not propose a boatshed. This clause is not applicable to the development.

Foreshores and Waterways Development Control Plan (DCP) is the associated non-statutory document in support of the Sydney Harbour REP. Criteria in relation to landscape character, design guidelines for land-based development have been reviewed. It is considered that the proposal supports these criteria as it is not located on any cliff lines or shorelines, will not be visible from the water, has generally been cleared of remnant vegetation and is an appropriate scale, built form and design.

7.2.10 State Environmental Planning Policy (Coastal Management) 2018

The site is within in an area impacted by mapping of the SEPP (Coastal Management) 2018. This SEPP includes development controls for coastal management areas that need to be considered when a development is proposed in these areas.

The site is identified as being within a coastal environment area and a coastal use area as shown in Figures 22 and 23 below, it is also near an area of littoral rainforest and coastal wetlands but the site is not impacted by the mapping.



Figure 22: Coastal Environment Area



Figure 23: Coastal Use Area

Table 11 below shows how the proposal complies with the provisions of the SEPP.

Table 11: SEPP (Coastal Management) 2018 Compliance

SEPP REQUIREMENT	COMMENT
Part 2 Development Controls for Coastal Management Areas	
Division 1 Coastal wetlands and littoral rainforests area	
10-11	Not applicable – site is not identified within the SEPP mapping for these areas.
Division 2 Coastal vulnerability area	
12	Not applicable – site is not identified as a coastal vulnerability area.
Division 3 Coastal environment area	
13 Development on land within the coastal environment area	Not applicable – subclause (3) of this clause states that the clause does not apply to land within the Foreshores and Waterways Area within the meaning of SREP (SHC) 2005. An extract from this map is included in Figure 24 below.
Division 4 Coastal use area	
14 Development on land within the coastal use area	Not applicable – subclause (2) of this clause states that the clause does not apply to land within the Foreshores and Waterways Area within the meaning of SREP (SHC) 2005. An extract from this map is included in Figure 24 below.
Division 5 General	
15 Development in coastal zone generally – development not to increase risk of coastal hazards	The proposed development is not likely to cause increased risk of coastal hazards as it is not located within the foreshore area.
16 Development in coastal zone generally – coastal management programs to be considered	Not applicable, there is no certified coastal management program applicable to the site.
17 Other development controls not affected	Noted.
18 Hierarchy of development controls if overlapping	Noted, no coastal management areas are applicable to the site.

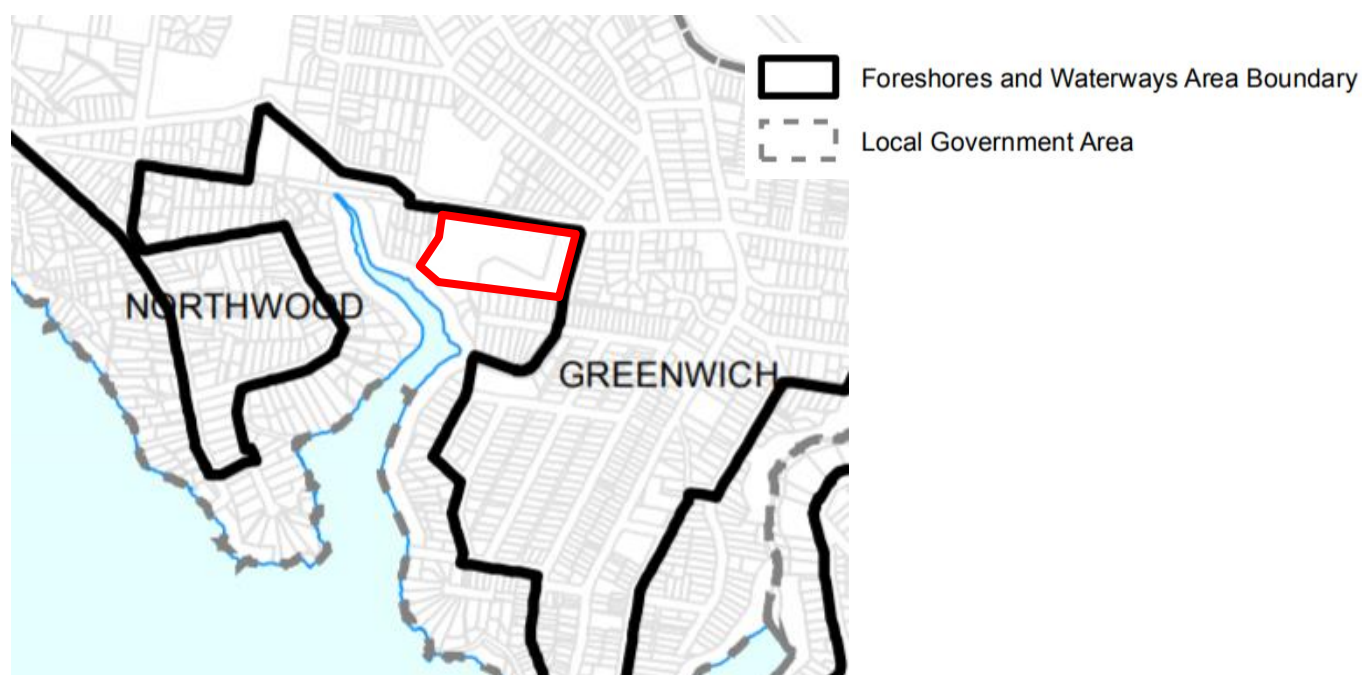


Figure 24: Extract of SREP (SHC) 2005 Foreshores and Waterways Area Map

As detailed above the proposal meets the relevant requirements of the SEPP (Coastal Management) 2018 and will not have any adverse impacts on coastal environment or use areas.

7.2.11 Draft State Environmental Planning Policy (Environment)

This draft SEPP has been developed to protect and manage the features of the natural environment that are important to communities. It proposes to simplify planning rules from a number of existing State policies that relate to water catchments, waterways, urban bushland and Willandra Lakes. The proposed SEPPs that will be consolidated include the following:

- State Environmental Planning Policy No. 19 – Bushland in Urban Areas
- State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011
- State Environmental Planning Policy No. 50 – Canal Estate Development
- Greater Metropolitan Regional Environmental Plan No. 2 – Georges River Catchment
- Sydney Regional Environmental Plan No. 20 – Hawkesbury-Nepean River (No.2-1997)
- Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005
- Willandra Lakes Regional Environmental Plan No. 1 – World Heritage Property.

The relevant SEPPs to this site include:

- State Environmental Planning Policy No. 19 – Bushland in Urban Areas
- Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005

These SEPPs have been addressed above in Sections 7.2.7 and 7.2.9. The proposal also complies with the proposed draft provisions as there will not be any significant adverse impacts on the Sydney Harbour waterways or catchment. In addition, the proposal has been designed to consider the views to and from the harbour and not impose any significant additional built elements.

7.3 Regional Plans and Strategies

7.3.1 A Metropolis of Three Cities – The Greater Sydney Region Plan

The Greater Sydney Regional Plan, *A Metropolis of Three Cities* is built on a vision of three cities and sets a 40 year vision and establishes a 20 year plan to manage growth and change in Greater Sydney considering social, economic and environmental matters. The plan integrates land use, transport and infrastructure between the three tiers of government and across the different State agencies.

The plan includes 10 directions which each include respective objectives for delivering and monitoring the plan. Table 12 includes the relevant directions and objectives for the proposed development and how the development responds.

Table 12: Compliance with Regional Plan

Direction	Objectives	Comment
A city supported by infrastructure	Objective 1: Infrastructure supports the three cities Objective 2: Infrastructure aligns with forecast growth – growth infrastructure compact	The proposed hospital will provide / enhance the medical facilities in the area and ensure this essential service is continued to be provided to the community and potentially take pressure of the public hospital system. The hospital is also being provided / upgraded in an existing area rather than expanding or moving to a greenfields site. It also is ensuring that dated

Direction	Objectives	Comment
	Objective 3: Infrastructure adapts to meet future needs	infrastructure can be adapted to meet the future needs of the area.
A collaborative city	Objective 5: Benefits of growth realised by collaboration of governments, community and business	The privately funded project will take some of the pressure off government funded hospitals and health care services for seniors by providing an alternative.
A city for people	Objective 6: Services and infrastructure meet communities' changing needs Objective 7: Communities are healthy, resilient and socially connected	The proposed changes to the hospital will ensure this important infrastructure will meet the changing needs of the community and ensure that the community can remain healthy and resilient. Further the provision of seniors living units in this location will mean that local residents will be able to remain and age in place rather than being removed from their social network.
Housing the city	Objective 10: Greater housing supply Objective 11: Housing is more diverse and affordable	The aged housing will provide options for aging in place and seniors living. This is an important housing supply for an aging population. The proposal will ensure that the housing on site is well supported with home services (Hammond at Home) and other supporting health community facilities. This is a different model / option to other housing for seniors provided where as full extend of health for seniors is provided on-site with an ability to cater for couples in different care levels.
A city of great places	Objective 13: Environmental heritage is identified, conserved and enhanced	The heritage item located on the site, Pallister, is being retained and protected.
A well-connected city	Objective 14: A Metropolis of Three Cities – integrated land use and transport creates walkable and 30-minute cities	The proposed redevelopment will ensure that these services are located within an existing community and urban area that is close to services and public transport.
Jobs and skills for the city	Objective 21: Internationally competitive health, education, research and innovation precincts Objective 22: Investment and business activity in centres Objective 23: Industrial and urban services land is planned, retained and managed	The proposal is ensuring that the site is being retained for urban development and ensuring that the hospital remains on the site for the provision of healthcare. These improvements are also an investment in business and growth within an existing area. The proposal will also provide additional employment during and after construction on the site and in flow-on services.
A city in its landscape	Objective 25: The coast and waterways are protected and healthier Objective 27: Biodiversity is protected, urban	The proposal will not have any adverse impacts on the Harbour, waterways or the adjoining bushland. The development has been designed to reduce any potential visual impacts and protect the nearby environment.;

Direction	Objectives	Comment
	bushland and remnant vegetation is enhanced Objective 28: Scenic and cultural landscapes are protected	
An efficient city	Objective 33: A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change Objective 34: Energy and water flows are captured, used and re-used Objective 35: More waste is re-used and recycled to support the development of a circular economy	The proposal has been designed considering energy efficient design and water re-use and waste management.

As shown above the proposal meets a number of the objectives and directions of the Greater Sydney Regional Plan.

7.3.2 Our Greater Sydney 2056 North District Plan

A Metropolis of Three Cities includes the three cities of Western Parkland, Central Diver and Eastern Harbour. The three cities cover five districts including Western City, Central City, Eastern City, North and South Districts. The subject site is included within the North District which includes the areas north of the Harbour to the Northern Beaches, west to Hornsby and Eastwood as shown in Figure 25 below.

The site is located within an economic corridor just to the south of St Leonards which is considered a Health and Education Precinct. Similarly, to the Metropolis of Three Cities the North District plan includes a number of Directions which are supported by Planning Priorities. The list below includes the planning priorities that specifically relate to this proposal:

- N1 Planning for a city supported by infrastructure;
- N3 Providing services and social infrastructure to meet people's changing needs;
- N4 Fostering healthy, creative, culturally rich and socially connected communities;
- N5 Providing housing supply, choice and affordability with access to jobs, services and public transport;
- N6 Creating and renewing great places and local centres, and respecting the District's heritage;
- N9 Growing and investing in health and education precincts; and
- N12 Delivering integrated land use and transport planning and a 30-minute city

These priorities among others are provided for in the proposed development by:

- Ensuring services are located near existing facilities and housing,
- Providing employment within existing centres and close to St Leonards, a health and education hub; and
- Providing housing choice for an aging population within an existing area which will allow local residents the opportunity to age in place.



Figure 25: Extract from North District Plan Structure Plan

★ Approximate location of site

8 Non- Statutory Policies, Plans and Guidelines

8.1 Policies, Plans and Guidelines

8.1.1 NSW State Priorities

The Premier of NSW has 12 priorities for the State that are shown below:

1. *Creating jobs – 150,000 new jobs by 2019*
2. *Delivering Infrastructure – Key metropolitan, regional and local infrastructure projects to be delivered on time and on budget*
3. *Driving public sector diversity – Increase the number of women and Aboriginal and Torres Strait Islander people in senior leadership roles by 2025*
4. *Improving education results – Increase the proportion of NSW students in the top two NAPLAN bands by eight per cent by 2019*
5. *Improving government services – Improve customer satisfaction with key government services every year, this term of government to 2019*
6. *Improving service levels in hospitals – 81 per cent of patients through emergency departments within four hours by 2019*
7. *Keeping our environment clean – Reduce the volume of litter by 40 per cent, by 2020*
8. *Making housing more affordable – 61,000 housing completions on average per year to 2021*
9. *Protecting our kids – Decrease the percentage of children and young people re-reported at risk of significant harm by 15 per cent by 2020 (based on the 2019 cohort of children)*
10. *Reducing domestic violence reoffending – Reduce the proportion of domestic violence perpetrators reoffending by 25 per cent by 2021 (based on the 2019 cohort of perpetrators)*
11. *Reducing youth homelessness – Increase the proportion of young people who successfully move from Specialist Homelessness Services to long-term accommodation to more than 34 per cent by 2019*
12. *Tackling childhood obesity – Reduce overweight and obesity rates of children by five percentage points by 2025*

The redevelopment of Greenwich Hospital campus will meet the relevant priorities by:

- Creating more jobs both during and after construction including flow on employment;
- Delivering an upgrade to an essential piece of infrastructure which will take pressure off the public hospital system and potentially improve their service levels; and
- Provide additional housing options specifically designed for the needs of seniors, and by an ongoing operator whose mission is to support those in need regardless of their circumstances;
- The housing includes options for seniors to age in place, options for couples in different care levels and affordability.

Further the NSW Government have 18 State Priorities that include the following:

Strong Budget and Economy

1. *Make NSW the easiest state to start a business*
2. *Be the leading Australian state in business confidence – encourage business investment*
3. *Increase the proportion of people completing apprenticeships and traineeships to 65% by 2019*
4. *Halve the time taken to assess planning applications for State Significant Developments*
5. *Maintaining the AAA credit rating*
6. *Deliver strong budgets – Expenditure growth to be less than revenue growth*

Building Infrastructure

7. *Improving road travel reliability – 90% of peak travel on key road routes is on time*
8. *Increase housing supply across NSW - Deliver more than 50,000 approvals every year*

Protecting the Vulnerable

9. *Transitioning to the National Disability Insurance Scheme – Successful transition of participants and resources to NDIS by 2018*

10. *Creating sustainable social housing – Increase the number of households successfully transitioning out of social housing by 5% over three years*

Better Services

11. *Improving Aboriginal education outcomes – Increase the proportion of Aboriginal and Torres Strait Islander students in the top two NAPLAN bands for reading and numeracy by 30%*
12. *Better government digital services – 70% of government transactions to be conducted via digital channels by 2019*
13. *Cutting wait times for planned surgeries*
14. *Increasing cultural participation – Increase attendance at cultural venues and events in NSW by 15% by 2019*
15. *Ensure on-time running for public transport – Maintain or improve reliability of public transport services over the next four years*

Safer Communities

16. *Reducing violent crime – LGAs to have stable or falling reported violent crime rates by 2019*
17. *Reducing adult re-offending by five per cent by 2019*
18. *Reduce road fatalities by at least 30 per cent from 2011 levels by 2021*

As detailed above the Greenwich Hospital campus redevelopment will provide a stronger economy by increasing employment, health service opportunities, improve social infrastructure and provide housing choice for the aging population within existing an urban area.

8.1.2 NSW 2021 – A Plan to make NSW number one

NSW 2021 – A plan to make NSW number one is a ten year plan to rebuild the economy, provide quality services, renovate infrastructure, restore government accountability, and strengthen our local environment and communities. It replaces the former State Plan and is based around five key strategies:

1. *Rebuild the economy - Restore economic growth and establish NSW as the 'first place in Australia to do business';*
2. *Return quality services - Provide the best transport, health, education, policing, justice and family services, with a focus on the customer;*
3. *Renovate Infrastructure - Build the infrastructure that makes a difference to both our economy and people's lives;*
4. *Strengthen our local environment and communities - Improve people's lives by protecting natural environments and building a strong sense of community; and*
5. *Restore accountability to government - Talk honestly with the community, return planning powers to the community and give people a say on decisions that affect them.*

The proposal addresses an increase in demand for high quality health care services and facilities and will generate positive social, environmental and economic benefits. The proposal is consistent with the strategies and objectives of the NSW 2021.

8.1.3 Future Transport Strategy 2056

The Long Term Transport Master Plan 2012 was recently replaced by Future Transport Strategy 2056 which now ensures the State is prepared for the future. The Strategy outlines a vision, strategic directions and customer outcomes with infrastructure and services plans underpinning the delivery of the directions across the State.

The vision for the strategy is based on six outcomes which include:

- *Customer Focused – Customer experiences are seamless, interactive and personalised, supported by technology and data*
- *Successful Places – The liveability, amenity and economic success of communities and places are enhanced by transport*
- *A Strong Economy – The transport system powers NSW's future \$1.3 trillion economy and enables economic activity across the state*

- *Safety and Performance – Every customer enjoys safe travel across a high performing, efficient network*
- *Accessible Services – Transport enables everyone to get the most out of life, wherever they live and whatever their age, ability or personal circumstances*
- *Sustainability – The transport system is economically and environmentally sustainable, affordable for customers and supports emissions reductions*

The subject site is highly accessible and well serviced by public transport. The proposed redevelopment of Greenwich Hospital campus will maximise and encourage the use of public transport infrastructure in proximity to the site.

8.1.4 NSW Healthy Urban Development Checklist

The Healthy Urban Development Checklist (HUDC) is a NSW Health initiative aimed to assist health professionals in providing comprehensive and consistent advice on urban development. Development and implementation of the HUDC is guided by four key principles; *equity, early engagement, interdependence and building partnerships*. The objectives of the checklist are to:

- Provide a standardised tool to guide and inform feedback and advice to local governments and developers on urban development policies and plans in NSW;
- Evaluate the health aspects of urban developers;
- Support engagement between urban planners and developer and health professionals; and
- Inform others (planners, developers, policy makers) about the range of factors that need to be considered in healthy urban development.

The checklist is structured into ten (10) chapters, each chapter focuses on a healthy urban development characteristic. The ten characteristics and their key considerations are addressed with regards to the proposed development in Table 13 below.

Table 13: Healthy Urban Development Checklist

CHAPTER REFERENCE	COMMENT
Healthy Food HF1: Promote access to fresh, nutritious and affordable food HF2: Preserve agriculture lands HF3: Provide support for local food production	Not Applicable.
Physical Activity PA1: Encouraging incidental psychical activity PA2: Promote opportunities for walking, cycling and other forms of active transport PA3: Promote access to usable and quality public open space and recreational facilities	Pedestrian links designed specifically for seniors connect buildings, facilities and common area across the site to encourage patients, residents, staff and visitors to traverse the site.
Housing H1: Encourage housing that supports human and environmental health H2: Encourage dwelling diversity H3: Promote affordable housing H4: Ensure that housing that is adaptable and accessible	The proposed development will provide additional housing stock for seniors in proximity to local centres and public transport networks. The housing will be adaptable in that residents will have access to the continuum of care serves as / when their care needs escalate.
Transport and Physical Connectivity TC1: Improve Public Transport Services TC2: Reduce car dependency and encourage active transport	The site has convenient access to public transport, including a bus stop (service route: 261) located immediately east of the signalised access on River Road, operating with a 10-minute service frequency. This route connects the site to

CHAPTER REFERENCE	COMMENT
TC3: Encourage infill development and/or integration of new development with existing development TC4: Encourage telephone and internet connectivity	surrounding key centres and the Sydney Central Business District.
Quality Employment EM1: Improve location of jobs to housing and commuting options EM2: Increase access to a range of quality employment opportunities EM2: Increase access to a range of quality employment opportunities EM3: Increase access to appropriate job training	The proposed redevelopment of Greenwich Hospital campus will result in additional employment opportunities for the local community, including opportunities during construction for local tradespeople and business and long-term professional roles for 174 staff.
Community Safety & Security CS1 Consider crime prevention and sense of security	The proposed development allows for a high degree of surveillance and promotes public safety for patients, residents, staff and visitors. A crime prevention through environmental design report (CPTED) can be provided as part of the subsequent detailed development application.
Public Open Space PS1: Public access to green space and natural area PS2: Ensure that public open spaces are safe, healthy, accessible, attractive and easy to maintain PS3: Promote quality streetscape that encourage activity PS4: Engender a sense of cultural identity, sense of place and incorporate public art PS5: Address the preservation and enhancement of places of natural, historic and cultural significance	Public and semi-private communal open space areas to the north of the hospital have been designed to act as an interface with the broader community. Open space and landscaped areas create a visual buffer and improves the amenity of the streetscape.
Social Infrastructure SI1: Provide access to a range of facilities to attract and support a diverse population SI2: Respond to existing (as well as projected) community needs and current gaps in facilities and/or service SI3: Provide for early delivery of social infrastructure SI4: Promote an integrated approach to social infrastructure planning SI5: Maximise efficiencies in social infrastructure planning and provisions	The proposed redevelopment of Greenwich Hospital campus responds to the existing and projected needs of the community by delivering an integrated health care facility primarily focussed on palliative care, rehabilitation and mental health for older persons. The campus will also bring together key elements of HammondCare's core services and futureproof the site through flexible and sustainable building design.
Social Cohesion & Social Connectivity SC1: Provide environments that will encourage social interaction and connection amongst people SC2: Promote a sense of community and attachment to place	The proposed development is consistent with the desired future character of the area and will enhance social cohesion and connectivity through optimising amenity in proximity to local centres. Spaces and facilities have been designed so that visitors to the site and the wider community feel welcome.

CHAPTER REFERENCE	COMMENT
SC3: Encourage local involvement in planning and community life SC4: Minimise social disadvantage and promote equitable access to resource SC5: Avoid community severance, division or dislocation	
Environment and Health EH1: Contribute to enhancing air quality EH2: Contribute to enhancing water quality, safety and supply EH3: Minimise disturbance and health effects associated with noise, odour and light pollution EH4: Consider the potential for hazards (both natural and man-made) and address their mitigation EH5: Avoid locating urban development in vector catchments	A construction management plan will be provided with the subsequent detailed development application and will address potential air, noise, odour and light pollution and will provide mitigation strategies to minimise any impacts or disturbances during construction and operation.

8.1.5 Sydney's Bus Future 2013

Sydney's Bus Future is the NSW Government's long-term plan to redesign Sydney's bus network to address existing and projected customer needs. The plan sets out step-by-step actions to deliver fast and reliable bus services by creating new routes, simplifying timetables and making interchanges more convenient. The three stages of Sydney's bus future include:

1. *Improve bus customer experience;*
2. *integrate bus services across Sydney; and*
3. *Serve future growth*

The proposed development supports the aims of Sydney's Bus Future 2013 by upgrading health facilities and providing housing for seniors in proximity to existing bus services on River Road. The Traffic and Parking Impact Assessment addresses provisions of public transport and bus networks in proximity to the site, refer to Appendix G.

8.1.6 Sydney's Cycling Future 2013

Sydney's Cycling Future 2013 aims to coordinate planning and investment to ensure cycling is a safe, convenient and enjoyable transport option. The objectives of the plan are to achieve the following:

- Investment in separated cycleways, providing connected bicycle networks to major centres and transport interchanges;
- Promotion and better use of existing network; and
- Ongoing engagement with government, councils, stakeholders, developers and bicycle users.

The proposed development supports the objectives on Sydney's Cycling Future 2013. Refer to the Traffic and Parking Impact Assessment in Appendix G for details relating to the provisions and networks for bicycle users.

8.1.7 Sydney's Walking Future 2013

Sydney's Walking Future 2013 aims to increase the number of people walking to help reduce the burden of congestion on our roads and free up capacity on key public transport corridors. The objectives of Sydney's Walking Future 2013 are to:

- Promote walking for transport;

- Connect people to places through safe walking networks around centres and public transport interchanges;
- Engage with partners across government, with councils, non-government organisations and the private sector to maximise effectiveness.

The proposed redevelopment of Greenwich Hospital campus supports the objectives of Sydney's Walking Future 2013 by maintaining existing pedestrian access at the corner of River Road and St Vincent's Road and establishing pedestrian entries adjacent to the driveways on both River Road and St Vincent's Road. Internal pedestrian links connect buildings, facilities and common area across the site to encourage patients, residents, staff and visitors to traverse the site.

9 Local Planning Framework

9.1 Lane Cove Local Environmental Plan

The site is currently zoned SP2 Infrastructure Zone (Health Services Facility) in Lane Cove Local Environmental Plan (LEP) 2009 as shown below in Figure 22.



Figure 26: Extract LEP 2009 Zoning Map

The objectives of the SP2 zone are:

- To provide for infrastructure and related uses.
- To prevent development that is not compatible with or that may detract from the provision of infrastructure.

The permissible uses on the site include the purpose shown on the land zoning map, including development that is ordinarily incidental or ancillary to development for that purpose. The purpose on the land zoning map is "Health Services Facility". In the LEP a *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 medical centre,
- community health service facilities,
- health consulting rooms,
- patient transport facilities, including helipads and ambulance facilities,
- hospital.

Further details on the permissibility of health services facilities are discussed above in Section 7.2.

The aged care facilities and seniors living units are proposed as uses associated to the main use of the site as a hospital. These uses are not specifically defined under health services facility but do have a number of similar siting requirements and are obviously land uses that work well situated in close proximity.

The use of the site for seniors living and aged care is not specifically permissible under the LEP, however it is permissible under the SEPP (Housing for Seniors or People with a Disability) 2004 as detailed in Section 7.2 above.

The following clauses are also applicable to the site:

Clause 4.3 Height of Buildings

Clause 4.3 refers to the height of buildings map and includes provisions relating to the permissible height of buildings within Lane Cove LGA. As shown in the Figure 23, there is no maximum building height provision for the site.



Figure 27: Extract LEP 2009 Height of Buildings Map

Clause 4.4 Floor Space Ratio (FSR)

Clause 4.4 refers to the floor space map and shows provisions relating to the maximum floor space ratios for sites within Lane Cove LGA. As shown in Figure 24, there is no maximum floor space ratio provision for the site.

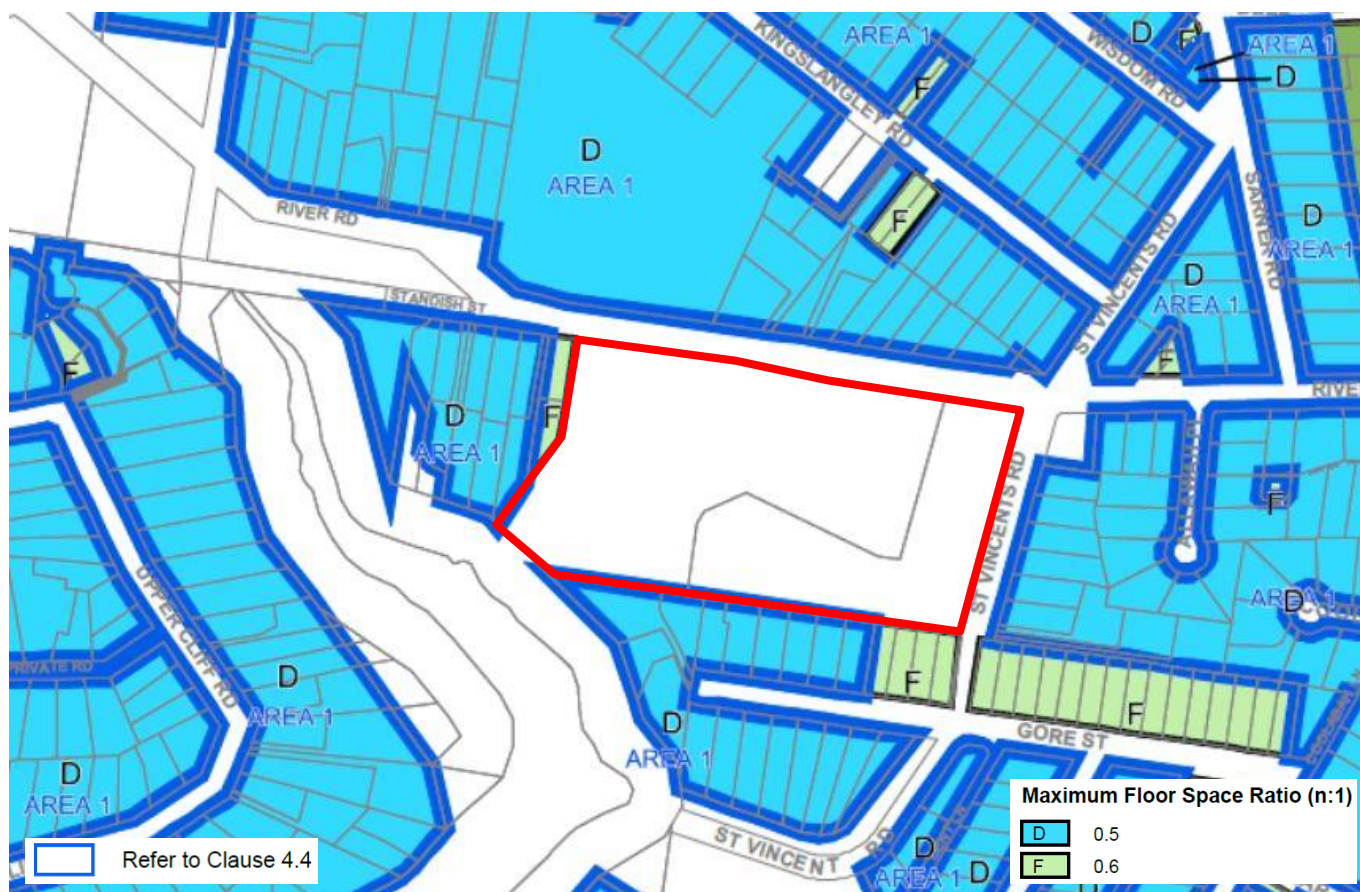


Figure 28: Extract LEP 2009 Floor Space Ratio Map

Clause 5.10 Heritage Conservation

Clause 5.10 refers to the heritage map and items listed within Schedule 5 – Environmental Heritage of the LEP. “Pallister” is both a local and State listed heritage item, refer to Figure 25 below.

The L-shape heritage curtilage is legally known as Lot 4 DP 584287 and contains the two-storey late Victorian house known as ‘Pallister’ and grounds. The statement of heritage impact addresses the provisions established by Lane Cove Council and NSW Office of Environment and Heritage, Heritage branch guidelines. NBR Architecture have been engaged to provide a statement of heritage impact, refer to Section 10.8 and Appendix H for design measures and recommendations.



Figure 29: Extract LEP 2009 Heritage Map

Clause 6.3 Riparian Land

Clause 6.3 refers to the Riparian Land Map. The site adjoins Gore Hill Reserve to the south west, which is mapped as Riparian land. The proposed development will not result in any impacts or interactions with the Riparian corridor or bushland areas adjoining the site.



Figure 30: Extract LEP 2009 Environmental Protection Land, Foreshore Building Line & Riparian Land Map

9.2 Lane Cove Development Control Plan

Clause 11(a) of State Environmental Planning Policy (State and Regional Development) 2011 excludes the application of development control plans. Notwithstanding this, the design has regard for and generally complies with the relevant aspects of the Lane Cove DCP, including:

- Part B General Controls, which includes a specific part on Heritage;
- Part F Access and Mobility;
- Part H Bushland Protection, due to the location close to Gore Hill Creek and reserve (refer also to Section above on SEPP No 19 – Bushland in Urban Areas);
- Part J Landscaping;
- Part O Stormwater Management;
- Part Q Waste Management and Minimisation; and
- Part R Traffic, Transport and Parking.

There are no specific controls relating to health care facilities.

10 Environmental Impact Assessment

10.1 Built Form and Urban Design (SEAR 3)

SEAR 3 requires that the application addresses the following:

- *Provide a building envelope study to justify the proposed built form;*
- *Establish appropriate design guidelines and development parameters within the context of the locality, including but not limited to: site layout, gross floor area, building footprints, height, massing of building envelopes, open space, landscaping and tree planting; and*
- *Provide a visual impact assessment that identifies any potential impacts on the surrounding built environment*

A detailed architectural design statement has been prepared by Bickerton Masters Architecture and is included in Appendix C.

Note: The architectural design statement should be read in conjunction with the architectural plans, photo montages, landscape plans and other supporting consultant reports.

Built Form and Site Layout

The concept proposal establishes visions and objectives for the site and seeks consent for building envelopes and indicative uses, as detailed in the architectural plans prepared by Bickerton Masters Architecture. Key components of the site layout and building footprint include:

1. Podium/Tower Hospital & Health Facilities Component

The proposed hospital building adopts a podium-tower typology. The form of the building aims to address the sites topography and reduce the appearance of bulk and scale whilst still achieving optimum organisational layout for hospital use. The podium levels provide circulation, servicing, administration and landscaping. The upper floors are articulated into three wings, accommodating a total of 150 new inpatient / residential aged care beds.

2. Seniors Living Units (Apartments)

The proposed seniors living units (apartments) will occupy the north west and south west portions of the site and articulated in depth and height to allow for adequate separation, generous setback and to reduce the appearance of bulk and scale.

3. Seniors Living Units (Villas)

The proposed seniors living units (villas) are small scale, light weight dwellings that are designed to provide a domestic scale along St Vincents Road. The villas sit below the canopy of existing trees and provides a buffer between the street and hospital.

The proposed site layout is detailed in the concept site plan shown below in Figure 31.

The proposal has been separated across the site in different heights and levels of development to complement the varying slope, retained areas of vegetation, the heritage areas, and adjoining scale of development. Figure 32 below includes a section of the proposed development to show how the development decreases in scale towards the outside of the site to reduce potential for impacts on adjoining properties.

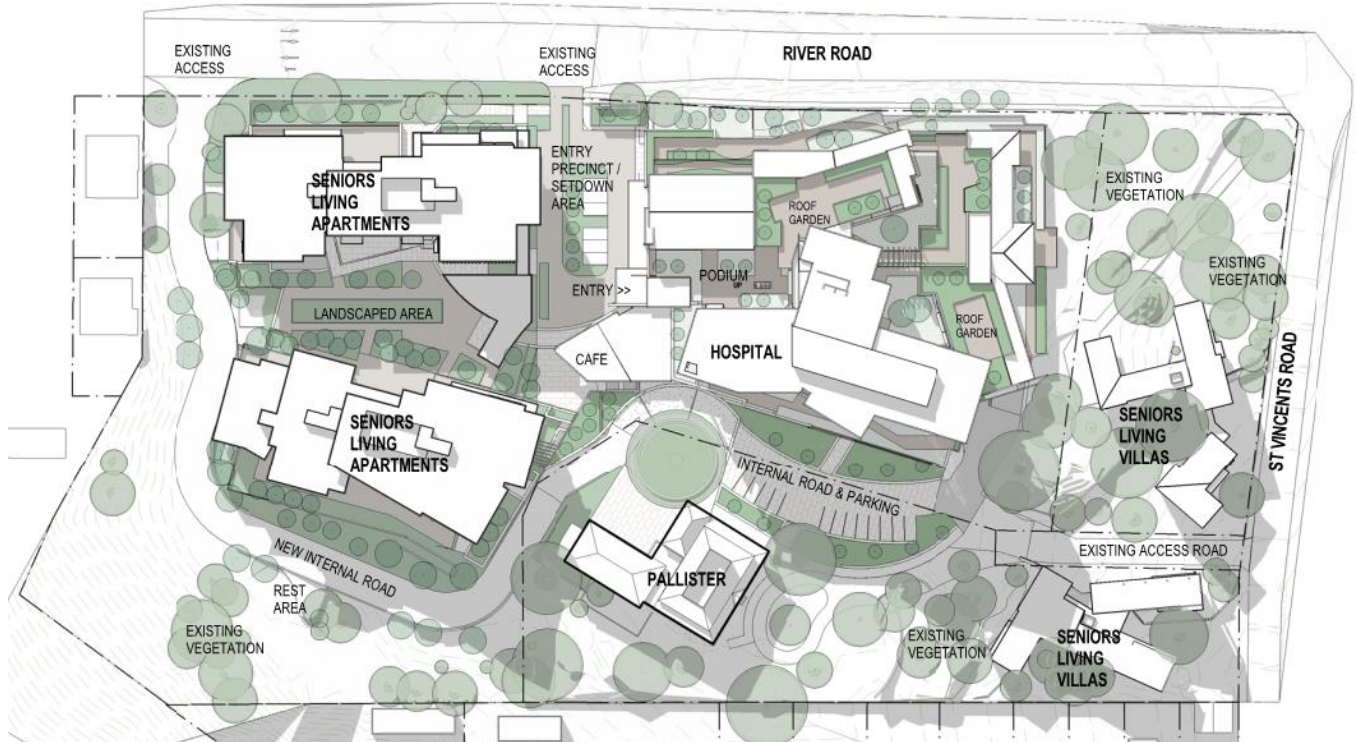


Figure 31: Concept Site Plan

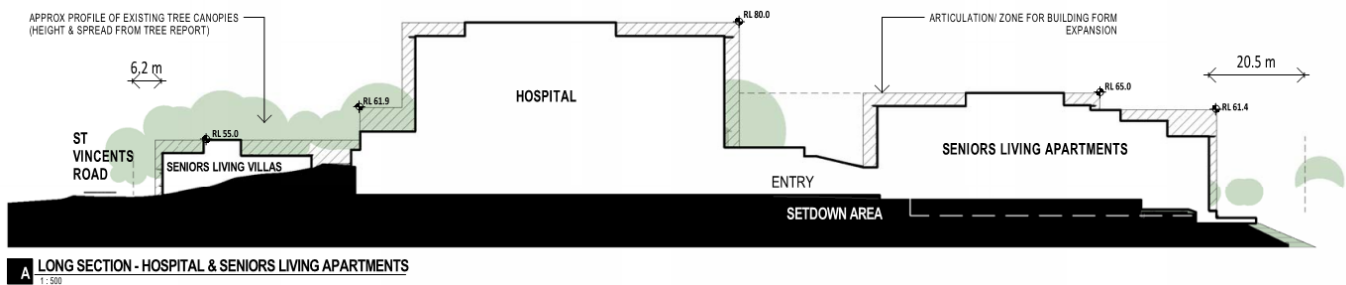


Figure 32: Extract of Sections

Gross Floor Area

The concept proposal has a gross floor area (GFA) of approximately 28,279m², which provides an FSR of 0.837:1. No maximum GFA or FSR controls apply to the subject site. This FSR is suitable for the style of development and location within an existing developed area.

Note: The GFA and FSR outlined above is indicative to the concept proposal. The GFA and FSR for the proposal will be confirmed in future, detailed development applications.

Height and Massing

The proposed development is of an appropriate height and massing to achieve maximum service potential, whilst protecting and enhancing the amenity of the area. The proposal has been designed to step back from River Road to reduce the scale of the development from the streetscape. Internal access roads provide generous landscape setbacks to the west of the site and terraced open space areas and vegetation create a visual buffer. '

The approximate, maximum building heights are:

Hospital - RL 80.0

Seniors Living Units (Seniors Housing) (Apartments) - RL 65.0

Seniors Living Units (Seniors Housing) (Villas) - RL 55.0

These heights are suitable for the large site they sit within and the locality within close proximity to services and other medical facilities.

Landscape and Tree Planting

Complete Urban have prepared concept landscape plans to complement and enhance the proposed redevelopment of Greenwich Hospital campus. The landscape scheme aims to achieve continuity across the site, contribute to visual interest and amenity, retain significant trees and vegetation associated with Pallister and utilise pathways and visual connections to ensure safe pedestrian links throughout the site.

Five (5) key landscaping zones are proposed, including:

Zone A – Buildings proposed in this area will have minimal footprints, leaving the natural ground plane relatively undisturbed. The area contains significant native trees, which are likely to be remnants of the pre-colonial forest, and which provide important habitat. New plantings will support these habitat values and retain representatives of the likely earlier vegetation, on site. The species will be drawn from those typical of the Coastal Enriched Sandstone Dry Forest.

Zone B – Pallister House defines a heritage precinct which includes its immediate setting, the building itself, and the larger curtilage. Its immediate setting currently contains a number of significant trees, not all of which are of the same age as the building but which nonetheless contribute to its presentation. These include Eucalypts, Fig and Cedar. These specimens are to be protected. New plantings will use species sympathetic to the era of the building, but will also allow it to relate simply to the new development on the site. Planting will give a degree of visual containment around the building, but without attempting to create a discrete “heritage” garden.

Zone C – Following re-grading in the area, establishment of appropriate soil conditions, and clearance of weeds, planting will establish a plant community generally consistent with the Coastal Sandstone Gallery Rainforest, and with the Coastal Sandstone Foreshores Forest.

Zone D – The planting approach will be to provide screening and mitigation of the apparent bulk of the new buildings. Species are selected to complement the Sydney moist gully landscape quality of the neighbourhood, and draws on the species typical of the naturally occurring forest types of the site.

Zone E - Planting in this as in other spaces mostly over structure will use plants familiar to older people, and which emphasise seasonal change and colour. They will also be chosen for ability to thrive in limited soil conditions. Deciduous trees will be incorporated to allow access to winter sun while providing summer shade. Taller plants will mitigate against problems arising from indivisibility between upper level rooms.



Figure 33: Extract from Landscape Plans

The landscape plans fit with the locality and includes appropriate indigenous species. The landscaping zones detailed above will provide appropriate buffers for adjoining areas and the boundaries of the site.

Visual Impact Assessment

Photo montages and computer rendered images have been prepared by Bickerton Masters Architecture and indicate that the topography of the site and existing and proposed vegetation assists in reducing and softening the visual impact from River Road, St Vincents Road and various vantage points across the site. These are included in Figures 34 – 38 below.



Figure 34: View from River Road to Entry Precinct



Figure 35: View of Hospital and Pallister House – Massing Model



Figure 36: View looking west along River Road near St Vincents Road intersection



Figure 37: View from River Road to North West Seniors Living Units (Apartments)



Figure 38: View Seniors Living Units (Villas)

View Impact Assessment

Photo montages included in Figures 39-40 indicate that no long distance or iconic views, such as views of the city skyline or harbour will be impacted as a result of the proposed development. Surrounding landowners do not have views over the site towards significant views.

The proposed built form concentrates buildings into smaller footprints to retain perimeter landscaping, therefore maintaining the leafy outlook and creating a visual buffer that improves the amenity of the streetscape.



Figure 39: View from corner of French Street and Seaman Street

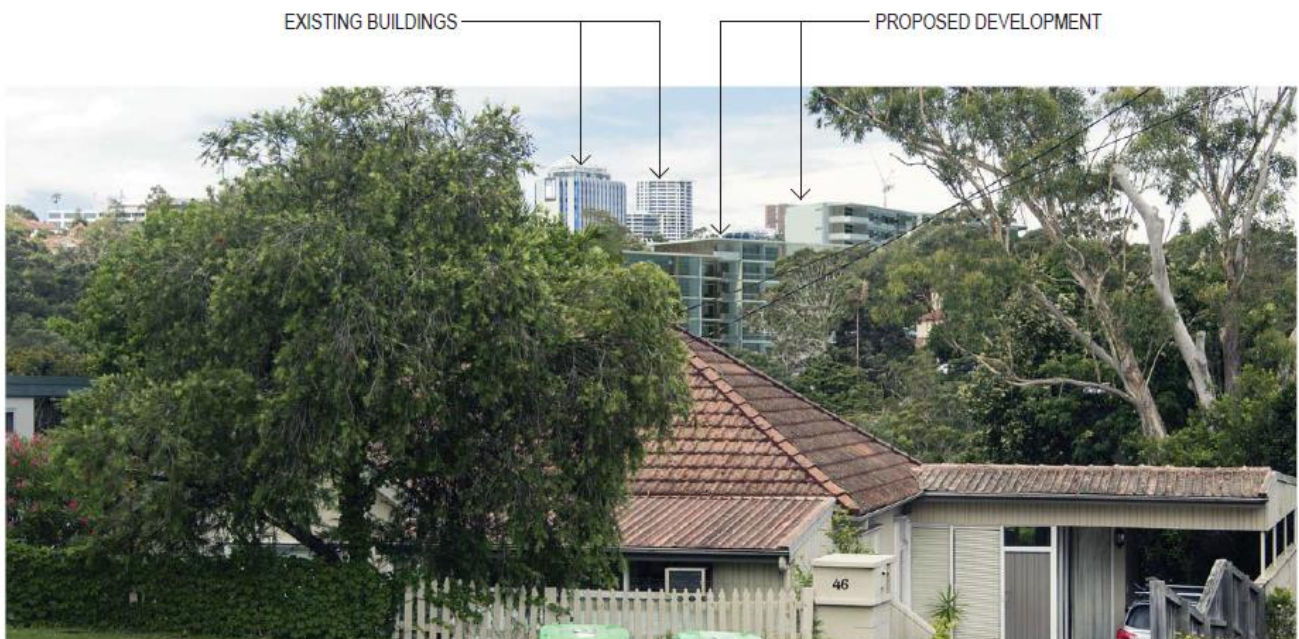


Figure 40: View from footpath at 46 Upper Cliff Drive

Notwithstanding the above, to ensure view loss has been considered, the Land and Environment Court (LEC) view loss planning principle assessment was undertaken for some nearby properties and is detailed below based on *Tenacity Consulting v Warringah [2004] NSWLEC 140*.

Step 1 – Assessment of views to be affected

Step 1: "The first step is the assessment of views to be affected. Water views are valued more highly than land views. Iconic views (e.g. of the Opera House, the Harbour Bridge or North Head) are valued more highly than views without icons. Whole views are valued more highly than partial views, e.g. a water view in which the interface between land and water is visible is more valuable than one in which it is obscured."

The views from the nearby residential properties are considered local views of roads, vegetated streets and rear yards. They would not be considered iconic views of water, harbour or the like but could be considered pleasant views in this locality. The aerial photograph in Figure 41 below provides an idea of the direction of the views and the extent of vegetation in the area.

There are also distant views from locations further afield including from Upper Cliff Drive, French and Seaman Streets as shown in Figure 42.



Figure 41: Aerial view of locality – showing potential views and vegetation

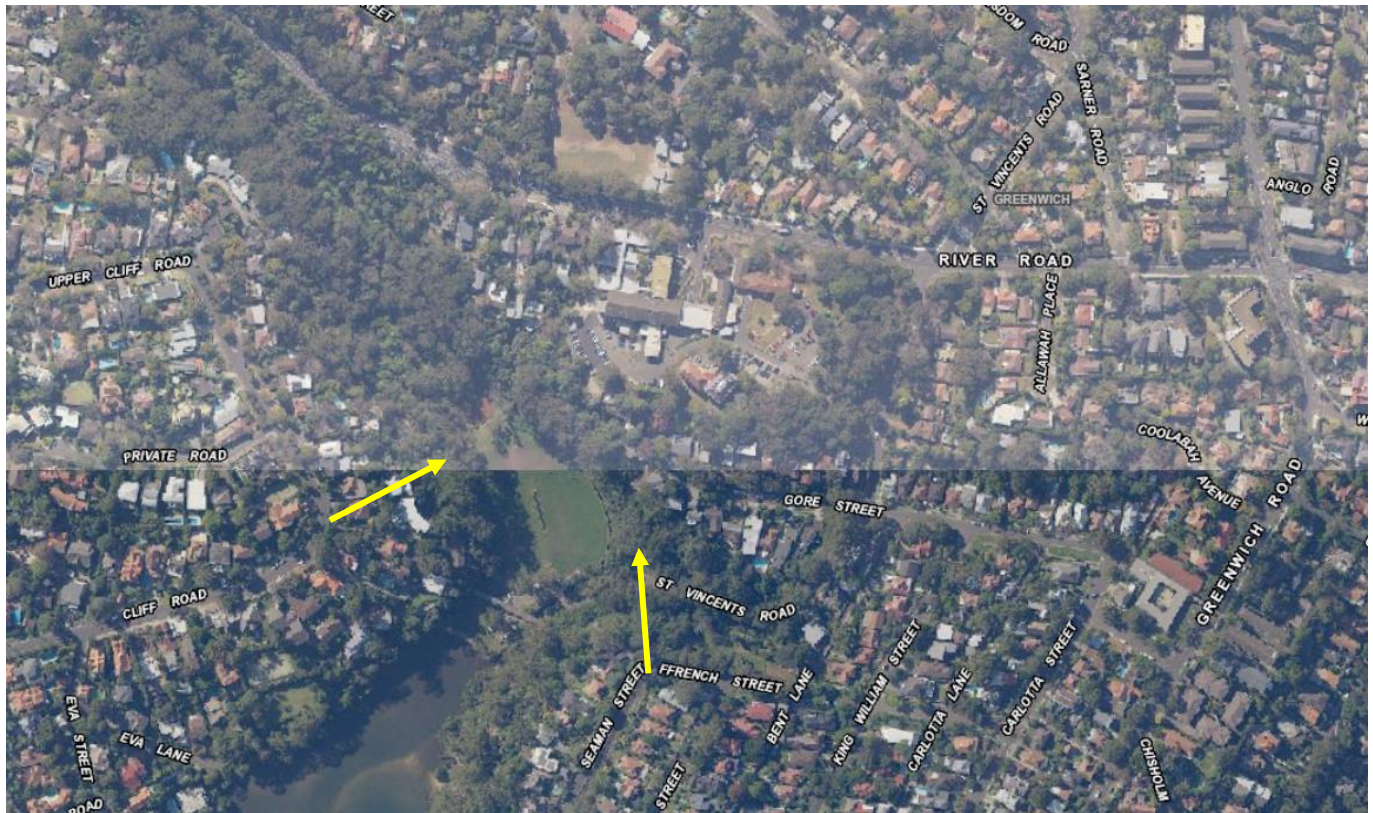


Figure 42: Location of photo montage view points

Step 2 – Where are the views obtained from?

Step 2: "The second step is to consider from what part of the property the views are obtained. For example the protection of views across side boundaries is more difficult than the protection of views from front and rear boundaries. In addition, whether the view is enjoyed from a standing or sitting position may also be relevant. Sitting views are more difficult to protect than standing views. The expectation to retain side views and sitting views is often unrealistic."

The existing dwellings along River Road, St Vincents Road, and Gore Street are a mix of single and two storeys. The views would be mainly from front yards and rooms. There are also some rear yards that have interface with the site that could have view implications. Much of the potential for views however has been restricted due to vegetation and boundary fencing. None of the adjoining properties have substantial views over the hospital site.

Some distant properties do have views of the site from further afield which is shown above in Figure 43. These are vegetated views of a number of buildings and do not include views that would be considered "iconic" in Sydney.

No formal assessment was undertaken from the dwellings in these areas, however due to the limited view available, this was not considered necessary at this point in the process.

Step 3 – Assessing extent of impact

Step 3: "The third step is to assess the extent of the impact. This should be done for the whole of the property, not just for the view that is affected. The impact on views from living areas is more significant than from bedrooms or service areas (though views from kitchens are highly valued because people spend so much time in them). The impact may be assessed quantitatively, but in many cases this can be meaningless. For example, it is unhelpful to say that the view loss is 20% if it includes one of the sails of the Opera House. It is usually more useful to assess the view loss qualitatively as negligible, minor, moderate, severe or devastating."

The visual impacts of properties directly adjoining the site or across roads, will not be significantly impacted as they do not have significant views of the site at present. The main potential for adverse impacts are from a distance as shown in Figures 40 and 41 above as seen from two locations indicated in Figure 43. Both views, although impacted by the buildings will not be significantly changed as a result of the development. They already have views of mixed buildings and landscape and the minor change created by these buildings will not be significant.

The proposed development will not block any iconic views of Sydney Harbour or the like and will not directly change or alter any direct view to the landscape of this part of the City.

Step 4 – Assess reasonableness of proposal

Step 4: *"The fourth step is to assess the reasonableness of the proposal that is causing the impact. A development that complies with all planning controls would be considered more reasonable than one that breaches them. Where an impact on views arises as a result of non-compliance with one or more planning controls, even a moderate impact may be considered unreasonable. With a complying proposal, the question should be asked whether a more skilful design could provide the applicant with the same development potential and amenity and reduce the impact on the views of neighbours. If the answer to that question is no, then the view impact of a complying development would probably be considered acceptable and the view sharing reasonable."*

The proposal is considered reasonable, as it works with the built form of the site and does not create significant adverse impacts on overshadowing, visual impact or view loss. The developments vary in height and setback from boundaries and work with the landscape (existing and proposed) on the site to create a development that respects the heritage building located on the site and the surrounding development.

No dwellings will have complete or significant loss of views and none will have significant adverse changes. The change to the views for the residents in the area indicated in Figure 43, in particular, will be a change, but they will still retain a mixed built and landscaped view not significantly different to that pre-development.

10.2 Amenity (SEAR 4)

SEAR 4 requires that the application addresses the following:

Assess amenity impacts on the surrounding locality, including view impacts, overshadowing and acoustic impacts

View Impacts

The development has been orientated to maximise the northern aspect to the hospital building and seniors living units. Communal open space areas have been designed along the primary axis, allowing for long distance views of Pallister from River Road. It is anticipated that as a result of the proposal, the number of people appreciating views of Pallister will be increased.

The proposed topography of the site and existing vegetation assists in reducing and softening the visual impact from a number of vantage points. No significant views or views of the sky line will be significantly impacted as a result of the development as detailed in Section 10.1 above and the view loss assessment included there.

Photomontages have been prepared by Bickerton Masters Architecture and are included above in Section 10.1 and in Appendix B. As outlined in Section 10.1 above, the proposal will not cause adverse view loss impacts.

Overshadowing

Shadow diagrams prepared by Bickerton Masters Architecture indicate the potential for additional overshadowing impacts to the private open space of neighbours, mainly along Gore Street. Detailed calculations have been undertaken to determine the exact impact of the proposal on overshadowing in its current and future forms. The shadow diagrams included in the architectural plans show the changes in detail every hour from 9am to 3pm in mid-winter. Table 14 below, shows the percentage change to the amount of natural light for the properties along Gore Street. There are four properties at 35-41 Gore Street that will have greater than a 10% change, however these properties are already impacted significantly by the shadow of major vegetation which can be seen on the aerial photo in Figure 43.

Table 14: Overshadowing changes for Gore Street Properties – Mid Winter

Address	Timeframe Existing Shadow	Existing Natural Light %	Timeframe Proposed Shadow	Proposed Natural Light %
No. 22 Gore Street	12pm-3pm	44%	12pm-3pm	44%
No. 24 Gore Street	12pm-3pm	60%	12pm-3pm	51%
No. 53 Gore Street	12pm-3pm	38%	12pm-3pm	38%
No. 51 Gore Street	11am-2pm	50%	11am-2pm	50%
No. 49 Gore Street	11am-2pm	50%	11am-2pm	50%
No. 47 Gore Street	10am-1pm	15%	10am-1pm	15%
No. 45 Gore Street	10am-1pm	26%	10am-1pm	26%
No. 43 Gore Street	9am-12pm	52%	10am-1pm	45%
No. 41 Gore Street	11am-2pm	75%	11am-2pm	63%
No. 39 Gore Street	10am-1pm	34%	11am-2pm	18%
No. 37 Gore Street	10am-1pm	41%	10am-1pm	15%
No. 35 Gore Street	10am-1pm	26%	9am-2pm	16%

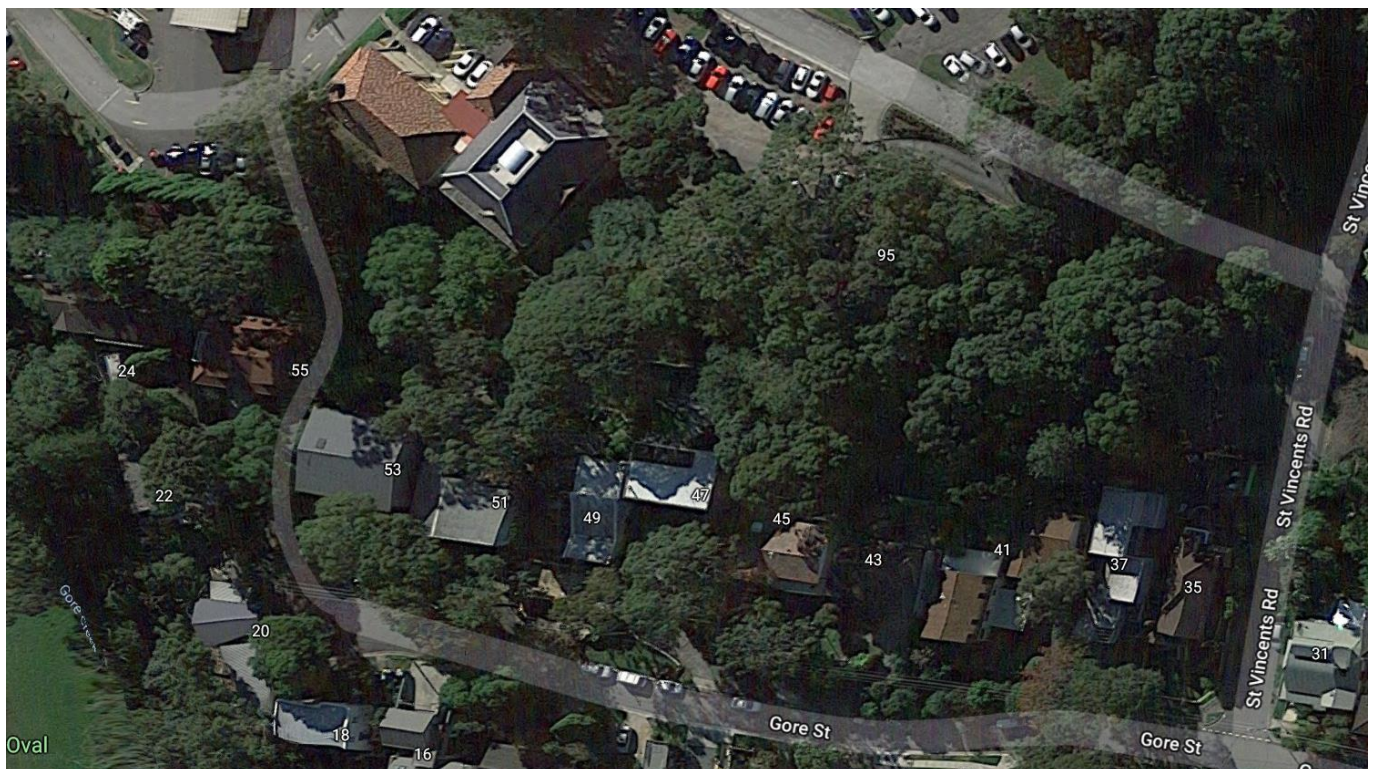


Figure 43: Aerial photo showing significant vegetation along rear of Gore Street properties

As stated above the topography and existing vegetation contributes to the bulk of shadowing over the southern boundary of the site. Potential overshadowing impacts have been minimised by building separation and generous setbacks to adjoining properties.

Figures 44 and 45 below show the changes in the most impacted properties adjoining the site.

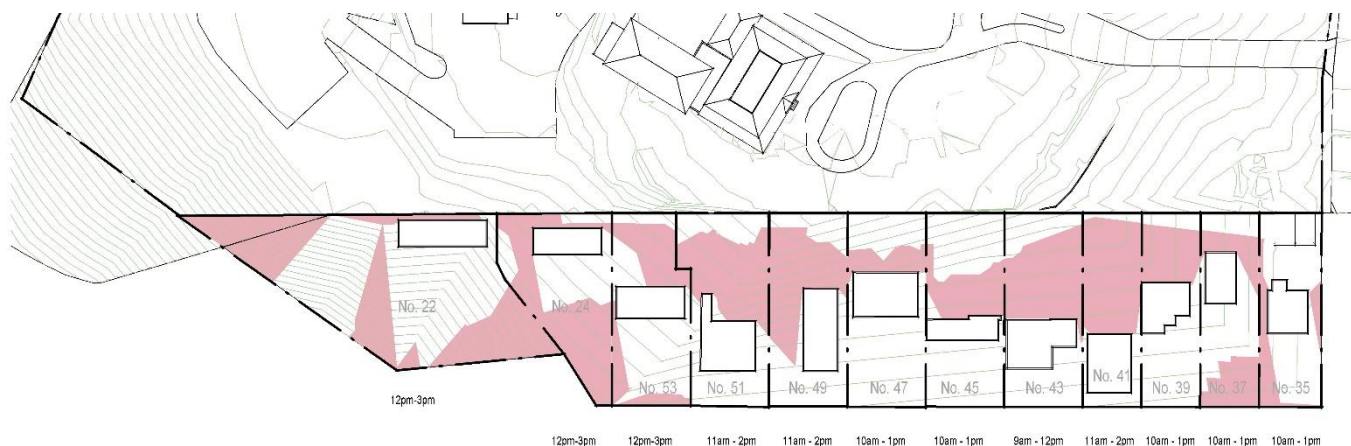


Figure 44: Existing Site Conditions – Winter Shading – External Area with 3 hours Natural Light



Figure 45: Proposed Site Conditions – Winter Shading – External Area with 3 hours Natural Light

The communal and public areas have been considered in terms of overshadowing. Figure 46 shows the communal and public areas of the site will receive sufficient sunlight for at least 3 hours mid-winter.



Acoustic Impacts

The existing hospital arrangements and activities will continue and seniors living units will not generate intrusive noise. An acoustic report has been prepared to support the concept application and is included in Appendix Q. The acoustic report undertook monitoring in a number of locations as shown in Figure 47 below. The report indicated that the primary operational noise sources for the proposed development are emissions associated with the following:

- Noise impacts from any external mechanical plant and equipment associated with the subject proposal.
- Noise impacts from additional traffic generated by the proposed redevelopment.

The report assessed these noise sources on the adjoining and proposed internal development on the site and concluded that the site is capable of meeting EPA noise emission guidelines dependent on a review of external mechanical plant and inclusion of appropriate acoustic treatments. In relation to traffic noise, the potential increase is expected to comply with noise objectives, however when detailed applications and traffic reports are completed, further assessment should be undertaken. Refer to full report for details.

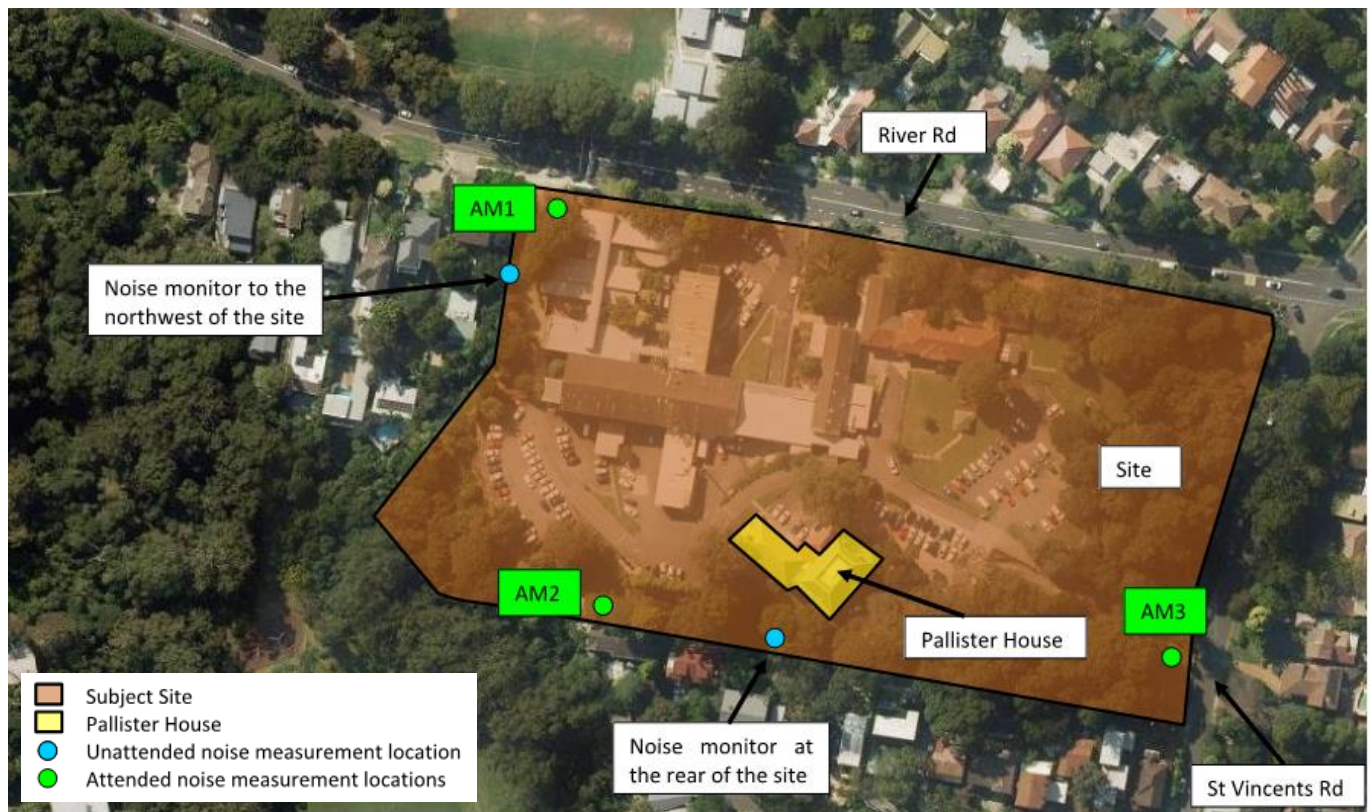


Figure 47: Extract from Acoustic report – monitoring locations

The acoustic report also considers noise and vibration impacts during construction and provides appropriate management and attenuation measures for the proposal. In conclusion, the following is provided in relation to construction noise and vibration:

Detailed noise management practices should be implemented for the control of construction noise. In principal acoustic review indicates that demolition, earthworks and piling, have the potential to exceed EPA Interim Construction Noise Guideline requirements, particularly when operating within 20m of the south-eastern, and north-western site boundaries. Noise mitigation through work scheduling and equipment selection should be considered. This should be implemented via a Noise and Vibration Management Plan, which should be compiled once the construction program and methodology is finalised.

Refer to full report for details of measures and recommendations.

The acoustic impacts following construction are considered reasonable and will not cause adverse impacts on surrounding development, so long as appropriate mitigation measures are included. The impacts during construction however will require appropriate management to ensure impacts are not adversely impacting neighbours.

10.3 Staging (SEAR 5)

SEAR 5 requires that the application addresses the following:

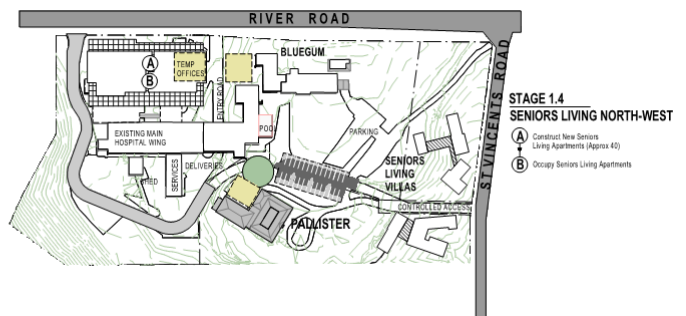
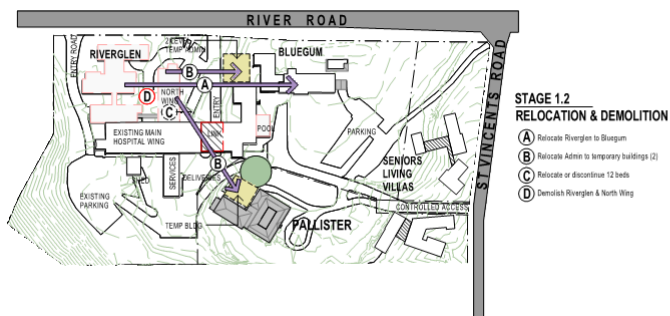
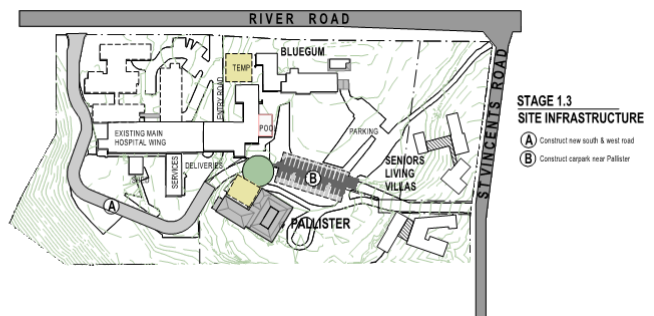
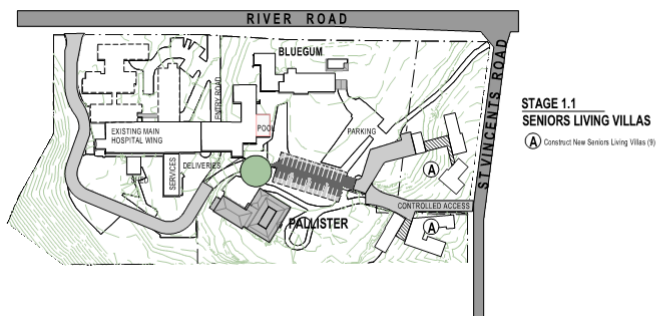
Provide details regarding the staging of the proposed development

The proposed development will be staged in construction to facilitate the continued use of the hospital and associated facilities. An indicative staging plan comprises four construction stages and is summarised in Table 15 below. Refer to indicative staging plan in Figure 48 and Appendix B.

A construction management plan will be provided with the detailed development application and will confirm construction methodology and staging, as well as outline mitigation measures to minimise any construction impacts or disturbances.

Table 15: Summary of Staging

STAGE	DETAILS
Stage 1.1: Seniors Living Villas	<ul style="list-style-type: none"> Construct New Seniors Living Villas (9).
Stage 1.2: Relocation & Demolition	<ul style="list-style-type: none"> Relocate Riverglen to Bluegum; Relocate admin to temporary building; Relocate or discontinue 12 beds; and Demolish Riverglen and north wing.
Stage 1.3: Site Infrastructure	<ul style="list-style-type: none"> New south and west road; and Carpark near Pallister.
Stage 1.4: Seniors Living North-West	<ul style="list-style-type: none"> Construct new seniors living apartments (approx. 40); and Occupy seniors living apartments.
Stage 2.0: Hospital	<ul style="list-style-type: none"> Construct 30% of carparking & BoH; Construct 90 beds + 50% OPD in lower levels; Relocate beds from existing hospital and bluegum; and Demolish existing hospital & bluegum.
Stage 3.0: 1&2 Storey Houses	<ul style="list-style-type: none"> Construct 3 accommodation wings – 45 beds (1 & 2 storey above podium); Construct 70% lower level car parking (below podium) + external set down area; and Construct remaining entry, admin & balance of OPD (west).
Stage 4.0: Seniors Living South-West	<ul style="list-style-type: none"> Construct remaining seniors living apartments; and Occupy apartments.



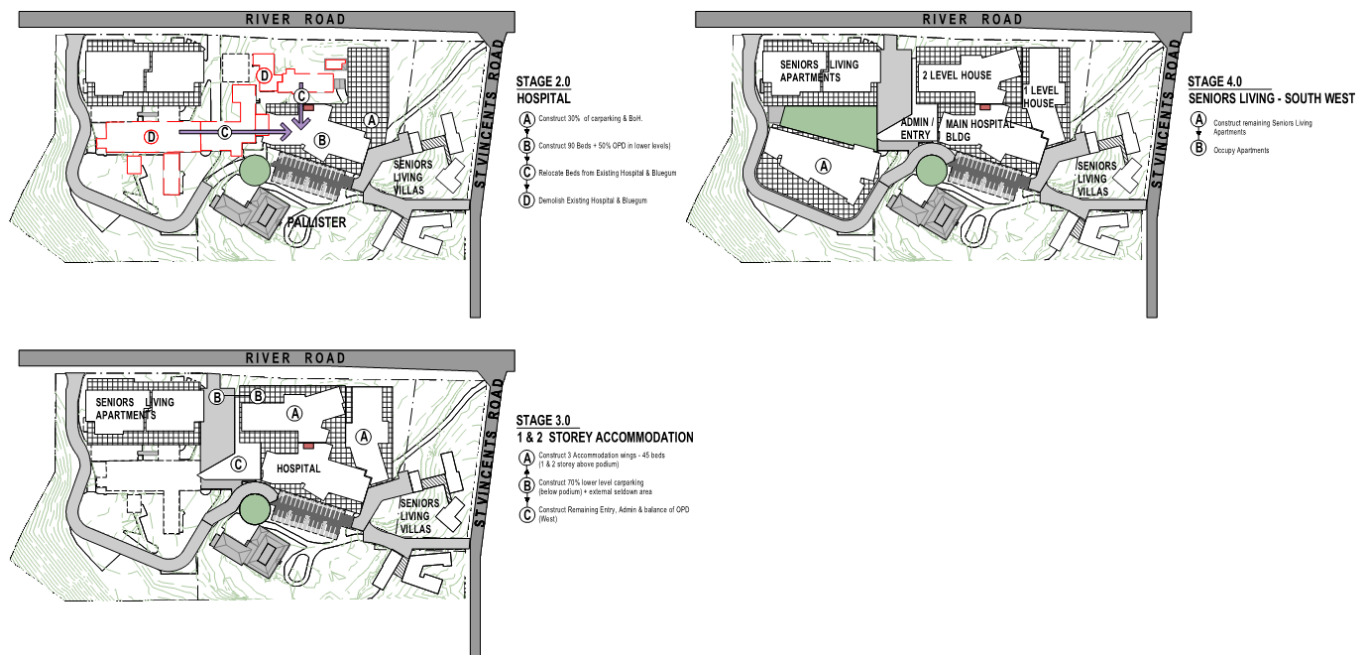


Figure 48: Indicative Staging Plans

10.4 Transport and Accessibility (SEAR 6)

SEAR 6 requires that the application addresses the following:

Prepare a transport and accessibility impact assessment including, but not limited to the following:

- the existing and proposed pedestrian and bicycle movements and facilities within the vicinity of the site and to public transport facilities as well as measures to maintain road and personal safety in line with CPTED principles;
- an estimate of the total daily and peak hour trips generated by the proposal, including vehicle, public transport, pedestrian and bicycle trips;
- the adequacy of public transport to meet the likely future demand of the proposed development;
- impact of the proposed development on existing and future public transport infrastructure within the vicinity of the site;
- measures to promote travel choices that support sustainable travel, such as a location-specific sustainable travel plan, provision of end-of-trip facilities, green travel plans and wayfinding strategies;
- the daily and peak (AM, PM and events) transport trip movements impact on nearby intersections, with consideration of the cumulative impacts from other approved developments in the vicinity, and the need/associated funding for upgrading or road improvement works (if required);
- the proposed active transport access arrangements and connections to public transport services;
- the proposed access arrangements, including car and bus pickup/drop-off facilities, and measures to mitigate any associated traffic impacts and impacts on public transport, pedestrian and bicycle networks;
- proposed car and bicycle parking provision, including consideration of the availability of public transport and the requirements of the relevant parking codes and Australian Standards; and service vehicle access, delivery and loading arrangements and estimated service vehicle movements (including vehicle type and the likely arrival and departure times).

Barker Ryan Stewart have prepared a Traffic and Parking Impact Assessment Report to assess and address traffic, access and car parking impacts, which concluded:

This Traffic and Parking Impact Assessment has been prepared in accordance with the requirements of the Lane Cove Council DCP 2010, the Road and Maritime Services (RMS)

'Guide to Traffic Generating Developments' to accompany a Development Application to Lane Cove Council for the development of a new hospital campus and senior's living.

The proposed internal road network is considered practical and safe ensuring that all traffic generated by the development can enter and exit the site in a forward direction. The estimated required parking is able to be generally accommodated on-site.

Taking into account the estimated traffic generation from the proposed development, existing traffic flow conditions and speed environment along River Road, it is considered that the expected increase in traffic generated would have a minimal impact on the safety and operating efficiency to the road frontage.

There would be no nexus or warrant to upgrade River Road as a result of any additional traffic generated by the development.

The Traffic and Parking Impact Assessment concludes that the subject site is suitable for the proposed intensification of use of the site in relation to the impact of traffic, vehicle access, parking and safety considerations. The development is considered to have negligible effect on the safety and operating outcome of the surrounding transport network.

As outlined in Section 3.1, the site has convenient access to public transport, including a bus stop (service route: 261) located immediately east of the signalised access on River Road, operating with a 10-minute service frequency. This route connects the site to surrounding key centres and the Sydney Central Business District.

The proposed development will maintain existing pedestrian access at the corner of River Road and St Vincent's Road and establishing pedestrian entries adjacent to the driveways on both River Road and St Vincent's Road. Internal pedestrian links connect buildings, facilities and common area across the site to encourage patients, residents, staff and visitors to traverse the site.

Although exact parking numbers have not been finalised at this time, there is sufficient space on the site and in basement parking to accommodate the required parking for each use, as detailed in the assessment report.

Based on the traffic assessment it can be concluded that the proposal will not have significant impacts on the surrounding transport network. Further the location of the site makes it well placed for public transport and access to nearby services.

10.5 Noise and Vibration (SEAR 7)

SEAR 7 requires that the application addresses the following:

- *Identify and provide a quantitative assessment of the main noise and vibration generating sources during operation. Outline measures and mitigate the potential noise impacts on surrounding occupiers of land; and*
- *Address the relevant policies and guidelines, including: NSW Industrial Noise Policy (EPA).*

An acoustic report was prepared by Acoustic Logic which considered noise and vibration impacts during and after construction. Specific details of the report are included in Section 10.2 above, with the report included in Appendix Q.

A construction management plan will be provided with the subsequent detailed development application and will address potential noise and vibration impacts and provide mitigation strategies to minimise any impacts or disturbances during construction and operation. Details of what should be included in this report was considered in the Acoustic report included in Appendix Q.

The site currently operates as a hospital and the proposed redevelopment is unlikely to substantially change noise levels between existing and proposed scenarios. The main noise sources during operation will be generated by car movements and mechanical plant. The acoustic report concludes the impact from traffic noise will be negligible and the mechanical plant can be appropriately attenuated.

The proposed basement car parking will also aid in the reduction of car movement noise, in comparison to the current situation where cars are parked at grade and without any physical barriers to minimise noise transmission to neighbouring properties. The upgraded hospital will result in the replacement of ageing mechanical plant with modern equipment and appropriate acoustic attenuation measures.

Accordingly, noise and vibration measures will mainly be a concern during construction and should be managed appropriately as detailed in the Acoustic report.

10.6 Ecologically Sustainable Development (SEAR 8)

SEAR 8 requires that the application addresses the following:

- *Detail how ESD principles will be incorporated in the design, construction and ongoing operation phases of the development; and*
- *Include a description of the measures that would be implemented to minimise consumption of resources, water (including water sensitive urban design) and energy.*

The proposed redevelopment of Greenwich Hospital campus has been designed with regard for key ecological sustainable development (ESD) principles as defined in Clause 7(4) of Schedule 2 of Environmental Planning and Assessment Regulation 2000.

A variety of ecologically sustainable development measures have been adopted and included in the proposed development, such as:

- Designed to minimise building footprint and maximise deep soil planting to maintain important landscape on the site;
- Materials will be recycled and reused where possible during the demolition and construction process;
- Building materials and fabrics will be selected according to their environmental performance and rating;
- Buildings have been oriented predominantly to the north-east to maximise solar access and minimise heating and lighting requirements;
- Inclusion of cross-ventilation for the seniors living units to minimise air conditioning requirements;
- Inclusion of rainwater tanks to enable for reuse for landscape irrigation;
- Inclusion of OSD and water quality treatment to control stormwater run-off and maintain downstream water quality; and
- Retention of substantial stands of vegetation through the site.

A number of mitigation measures and recommendations will be adopted in the final detailed design to ensure the proposed development does not result in any unacceptable impacts to the environment.

Additional building related energy and water saving measures will be specified in the subsequent detailed DA stage and will be supported by a detailed ESD Report. Appropriate BASIX certification for the dwellings and NatHERS details will also be provided for the detailed design. The concept design complies where possible with sustainable design, however the detailed design phase will include the specific compliance and measurable detail.

Refer to table included in section 12.5 for additional information on sustainability compliance.

10.7 Biodiversity (SEAR 9)

SEAR 9 requires that the application addresses the following:

Biodiversity impacts related to the proposed and the preparation of a Biodiversity Assessment are to be addressed in accordance with the requirements of the Biodiversity Conservation Act 2016

A Biodiversity Development Assessment Report (BDAR) has been prepared by Keystone Ecological to consider the biodiversity on the site and identify protective measures to minimise the likely impacts of the proposed development. The report concluded that:

The proposed redevelopment of Greenwich Hospital at Lot 3 DP 584287 (97-115 River Road, Greenwich) and Lot 4 DP 584287 (95 River Road, Greenwich) in the Lane Cove LGA has been assessed by way of a BDAR, as per request of the SEARs (dated 14th September 2017).

The site occupies approximately 3.38 hectares and encompasses the historic lot of Pallister House, including the historic gardens.

The proposed redevelopment will be staged to include the demolition of some of the existing hospital buildings, the construction of the new proposed hospital facilities, senior living apartments and seniors living villas. The historic building of Pallister House will not be altered by the proposal and majority of the historic gardens will remain.

The proposal will require the removal and modification to approximately 0.44 hectares of native vegetation identified across the site as PCT 1776 Smooth-barked Apple - Red Bloodwood open forest on enriched sandstone slopes around Sydney and the Central Coast. A further 0.87 hectares of landscaped gardens identified as PCT 684 Blackbutt - Narrow-leaved White Mahogany shrubby tall open forest of coastal ranges, northern Sydney Basin Bioregion will be removed and modified by the proposal.

The removal of vegetation within the extent of PCT 1776 on site will remove suitable foraging habitat for at least three threatened species recorded on site during survey:

- *Pteropus poliocephalus* Grey-headed Flying-fox
- *Saccolaimus flaviventris* Yellow-bellied Sheath-tail-bat
- *Chalinolobus dwyeri* Large-eared Pied Bat

Removal of potential foraging resources within PCT 684 have not been assessed under the BAM due to the very low condition of vegetation recorded.

No threatened flora species or endangered ecological communities were recorded across the development site during survey.

Native vegetation of concern is restricted to within the historic garden of Pallister House along the eastern boundary of the site and impacts to this vegetation have attempted to avoid and minimise the impacts to the extent of native vegetation identified on site.

The loss of non-native vegetation on site will be ameliorated by the implementation of a Landscape Plan. This will aim to reinstate native vegetation associated with PCT 1776 across the site in the post development landscape.

A total of 4 hollow-bearing trees within the extent of PCT 1776 and non-native vegetation on site will be removed by the proposed development. The loss of hollow-bearing trees will be ameliorated by the installation of suitable nest boxes within the retained vegetation on the site and within the western portion of the site, downslope of the hospital grounds.

Overall, the proposed development will be required to offset the extent of native vegetation identified on site and the associated predicted threatened species by obtaining 7 Ecosystem credit species.

Impacts to *Chalinolobus dwyeri* Large-eared Pied Bat habitat will also require 11 Species credits to be obtained.

In order to reduce potential impacts to vegetation and available habitats on site, a set of management actions have been recommended that will further avoid and ameliorate potential impacts during the construction phase:

- All works in and around retained native trees are to be supervised by the Project Arborist.
- All suitable Tree Protection Zone and Structural Root Zone controls are to be implemented under supervision of the Project Arborist.
- Species to be planted as part of the Landscape Plan are to be informed by locally native species listed as occurring within the vegetation community Coastal Enriched Sandstone Dry Forest S_DSFO4 (OEH 2013).

It is considered that the proposed development is not likely to impose significant adverse impacts on any matters of import and that it does not trigger the Biodiversity Offset Scheme.

Direct impacts on natural vegetation and habitats have been minimised by the location of new buildings within previously disturbed areas. A number of protective measures have been identified to retain trees during the construction process, these include:

- Protective fencing and signage around retained native vegetation and isolated native trees;
- Use of qualified and experience arborists. Minor limb removal may be required to clear access for proposed works. All works are to be undertaken by a qualified arborist and supervised by the project arborist;
- Certification of works by the project arborist;
- Monitoring of works throughout the project at regular intervals.

It has also been recommended that the species included in any landscape plans be informed by locally native species.

The proposal has therefore appropriately considered the biodiversity values on the site and complies with the relevant local, State and Federal legislation.

Refer to the BDAR included in Appendix N for further details.

10.8 Heritage (SEAR 10)

SEAR 10 requires that the application addresses the following:

- Provide a statement of heritage impact which identifies the following: All heritage items within and in the vicinity of the site including built heritage, landscapes and archaeology, detailed mapping of these items and why the items and site is of heritage significance; what impact the proposed works will have on their significance, including any impacts from the works, and any impacts on views to and from heritage items; and detailed mitigation measures to offset potential impacts on heritage values; and
- Address any archaeological potential and significance on the site and the impacts the development may have on this significance.

The L-shape heritage curtilage is legally known as Lot 4 DP 584287 and contains the two-storey late Victorian house known as 'Pallister' and grounds. 'Pallister' is listed as state heritage item SHR 00574. The following statement of significance for Pallister is sourced from the Office of Environment and heritage database (ref: 5045388).

Pallister incorporates the late Victorian house known as Standish, which was built as a residence for John St Vincent Welch and his family in 1892, and is evidence of residential development and the suburbanisation of the Municipalities of Lane Cove, Willoughby and North Sydney. Standish is a rare example of a late Victorian Gentleman's residence within Greenwich. The house embodies the lifestyle and aspiration of Mr John St Vincent Welch and his family. It is the best surviving example of a late Victorian gentleman's villa and remnant garden setting, including a tear-drop shaped carriage loop in Greenwich. It is associated with John St Vincent Welch and his family. John St Vincent Welch was a prominent businessman, who served the insurance business and the general community on Sydney in a number of ways including: Alderman to Willoughby Council, one of the first aldermen to the Borough of Lane Cove, co-founder of the Sydney Liedertafel (Later called the Apollo Club), member of the Amateur Orchestra Society, trustee of the Art Gallery of New South Wales. The house was the childhood home of Dr Kenyon St Vincent Welch who was the first doctor appointed to the Flying Doctor Service. The buildings has been associated with the Anglican Deaconess Institute Sydney since 1946, and with a wide range of welfare and community activities, particularly in relation to adolescent girls and based on the vision and principles established by Miss Anna Pallister (CMP 2004).

NBRS Architecture have been engaged to provide a statement of heritage impact and have identified the following components of the curtilage area that contribute to interpreting and understanding the significance of Pallister:

- *Pallister the two-storey late Victorian house;*
- *Tear-drop shaped carriage loop;*
- *Mature fig tree; and*
- *Bridle path from the corner of River Road and St Vincent's Road towards 'Pallister'.*

Pallister currently houses the hospitals dementia centre, research facilities and education services, it is intended to continue these uses. No demolition, alterations, additions or works of any kind are proposed to Pallister. Proposed works in the immediate setting of Pallister include:

- *Formalising of the car parking spaces accessed of the relined internal road;*
- *Extension of the bridle path across the access road from St Vincent's Road, into the garden of Pallister and across the front of the house;*
- *Reintroduction of the garden plantings between the carriage loop path and the parking area; and*
- *Paving at the western side of the house.*

The statement of heritage impact confirms that the concept proposal is acceptable from a heritage perspective. The following considerations and design measures have been adopted to minimise any impacts on Pallister, including its significance, curtilage and setting:

- *The removal of unsympathetic ad hoc parking and vehicular access arrangements allow for the provisions of additional garden beds and will improve the immediate setting of Pallister;*
- *The proposed layout provides the opportunity to create a garden interface to the front of the primary house façade. This action supports the setting of the carriage loop;*
- *The bridle path will be retained and where it traverses the access road from St Vincent's Road it will be upgraded and continued across to Pallister to improve the visual and physical connectivity of the two components of the curtilage area;*
- *The hospital has been designed as a podium-tower typology, with a series of faceted wings to minimise the appearance of bulk;*
- *Views across the site have been retained along the access corridors created by the internal road network. These view corridors also provide a physical distance between the heritage item and the new development; and*

- *The seniors housing (villas) have been designed to step down the slope of the land, generally sit within the existing trees and employ a 'pier and beam' construction system to achieve a reduced level of intervention to the curtilage area.*

The statement of heritage impact addresses the provisions established by Lane Cove Council and NSW Office of Environment and Heritage, Heritage branch guidelines. NBRs Architecture have made the following recommendations regarding the concept proposal:

R1 – That should future changes be contemplated for the Pallister building, that the 2004 Conservation Management Plan be updated to reflect subsequent changes to the place.

R2 – That any archaeological evidence uncovered in relation to the bridge over the creek during the course of the project be included in the updated CMP.

R3 – That a suitable qualified heritage landscape consultant be commissioned to detail and specify appropriate garden plantings, edging and paving materials to the immediate setting of the heritage item for inclusion.

R4 – That as part of any consent the preparation of a construction management plan that specifically identifies all protective, managing and monitoring systems and strategies for Pallister be prepared and that it is approved by the consent authority prior to work commencing. This CMP is to be reviewed by the heritage consultant and any feedback implemented as required.

The consent authority should have no hesitation in approving this application from a heritage perspective.

The proposed development has therefore considered the impacts of the proposed development on the heritage item and has designed the development accordingly. In the detailed design phase, the recommendations of the assessment and any further comments from Council and the Office of Environment and Heritage will be considered and used to form the design of the buildings and their relationship to the site and surrounds.

10.9 Aboriginal Heritage (SEAR 11)

SEAR 11 requires that the application addresses the following:

Where relevant, address Aboriginal Cultural Heritage in accordance with the Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011) and Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010.

Following a preliminary assessment of the site by GML, a detailed Aboriginal Cultural Heritage Assessment (ACHA) was undertaken by Cultural Heritage Connections and is included in Appendix R. This assessment included consultation with local Aboriginal communities and concluded the following:

The project area is sloping in nature and does not include a significant water source. Although Gore Creek is within 100 metres, the project area is elevated above the creek at the top of a steep slope. The project area is therefore unlikely to have been a favoured camping location. Some rock overhangs are located near the eastern perimeter facing St Vincent Street. These have some potential to contain evidence of past occupation.

The most likely location of sites in the locality is within shelters. The original landform steep slope with limited soil preservation is unlikely to have been conducive to preserving open sites, even prior to additional ground surface disturbance due to the site's development. The site has been developed since the late 1800s and was extensively re built from the 1960s for its current use as a hospital. This development would likely have removed some if not all physical evidence of past Aboriginal occupation that may have previously been present.

One portion of the project area (shown in Figure 5) has some potential for Aboriginal objects within rock overhangs that are currently inaccessible. Visibility is low in this area.

Figure 5 from the ACHA is included below as Figure 50 and shows the areas of medium level potential for archaeological evidence of Aboriginal occupation.

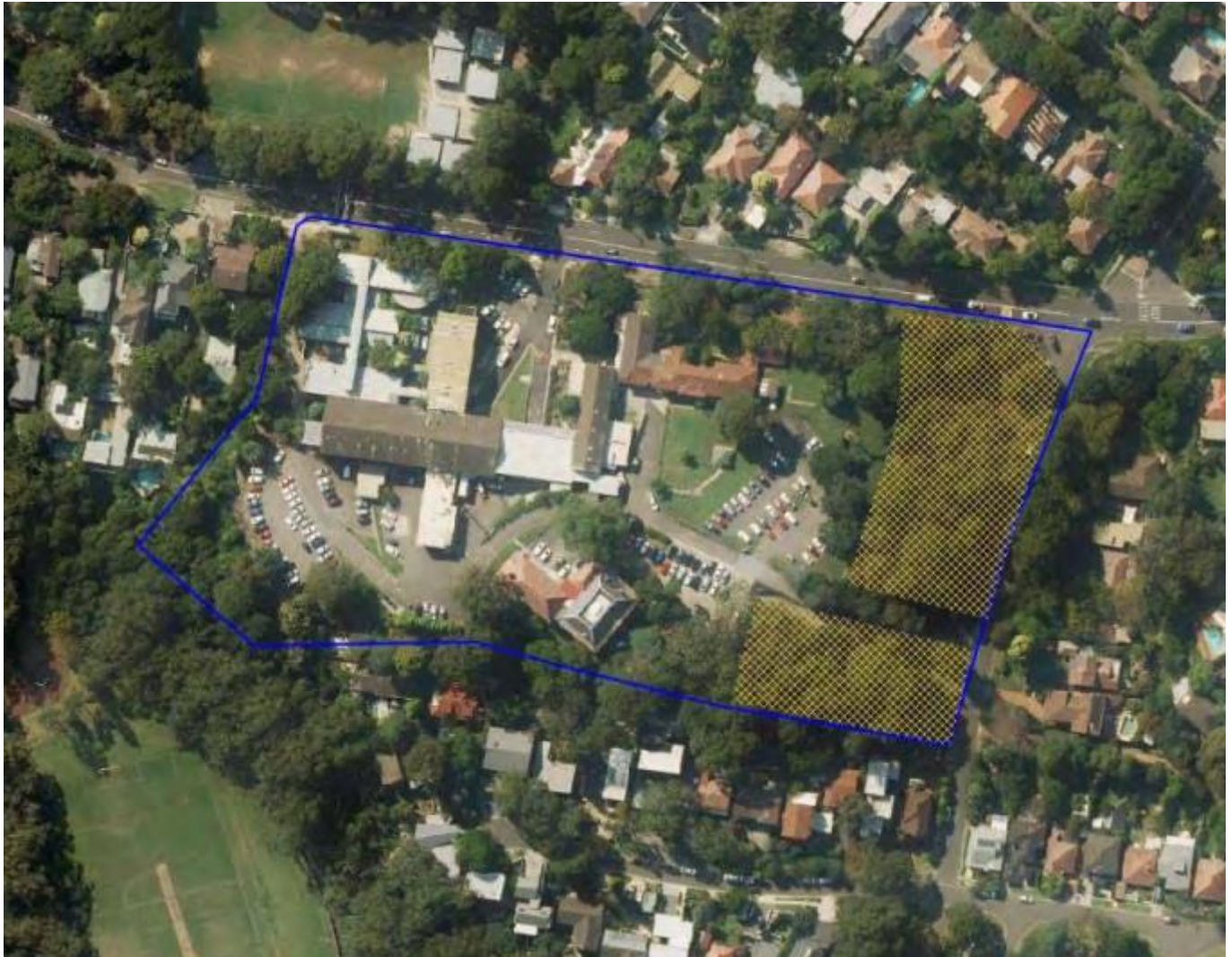


Figure 49: Areas of Moderate Archaeological Potential (extract from ACHA)

Following from the above conclusion the ACHA recommends the following:

On the basis of the findings of the above assessment and the legislative framework for protecting and assessing Aboriginal archaeological sites in NSW, the following recommendations are provided:

- 1) *In the parts of the project area assessed as having low archaeological potential and low potential to contain Aboriginal objects, it is recommended that there are no objections to the development on Aboriginal archaeological grounds.*
- 2) *In the area identified as having moderate potential to contain Aboriginal objects (Figure 5) impacts should be minimised.*
 - a) *If rock overhangs are uncovered / made accessible during landscaping works further archaeological inspection should be undertaken to determine whether Aboriginal objects are present. If necessary, a cultural heritage management plan should be put in place to prevent unforeseen indirect or direct impacts to Aboriginal objects.*

- b) *As development consent is being sought for Concept proposal approval, development impacts in the area of moderate archaeological potential can be minimised by design refinements, if required, at the subsequent detailed DA stage. These design refinements could include minor repositioning of building footprints; and/or a pier and beam structural system to avoid extensive excavation. Many trees in the area will be retained and disturbance to ground surface area will be kept to a minimum. In light of this, the likelihood of impact to Aboriginal objects in this area is low. When the development footprint and construction methods are finalised, impacts should be managed via a construction management plan.*
- c) *Consideration should be given to interpretation of cultural values to be incorporated in to the open space areas within the development.*
- 3) *A protocol should be put in place to deal with any unexpected Aboriginal objects that may be located during the course of the project. This should be included in the construction management plan or equivalent documentation. A draft protocol is presented below.*
- 4) *In the extremely unlikely event that suspected human remains are found the Coroners Act 2009 requires that all work must cease, the site should be secured and the NSW Police and the NSW Coroner's Office should be notified. If the remains are found to be Aboriginal, OEH and the LALC should be contacted to assist in determining appropriate management.*

Therefore, the proposed development can be undertaken so long as the above recommendations are considered in future development applications and in relation to the actual development of the site. Further on-going management recommendations have also been recommended to ensure there are no impacts during construction as an Aboriginal Heritage Impact Permit (AHIP) is not required as part of an SSD application process. If items are found during construction the following if the procedure is to be followed to deal with unexpected finds:

- *On-site employees or contractors involved in ground surface disturbance should be made aware of the statutory obligations that apply to the discovery of Aboriginal objects prior to the commencement of works.*
- *If a suspected Aboriginal object is located during construction, works should cease in the vicinity of the find and a fully qualified archaeologist with experience in archaeological excavation and identifying Aboriginal objects and should be called to site to determine the nature of the object.*
 - *If it is confirmed that it is an Aboriginal object and it is in an isolated context (i.e. it is not likely that in situ deposit or further items will be present), its location can be recorded and it can be removed and the works continue. The RAPs should be contacted regarding appropriate long-term management of the object.*
 - *If it is confirmed that it is an Aboriginal object and it is suspected that further material or in situ deposit could be present the RAPs should be contacted to determine an appropriate excavation strategy to salvage the in situ objects.*
- *Consideration should be given to relocating any Aboriginal objects removed from the site back into a secure place within the project area.*
- *If the item is found to not be an Aboriginal object, works may continue.*

10.10 Contributions (SEAR 12)

SEAR 12 requires that the application addresses the following:

Address Council's Section 94A Contribution Plan and/or details of any Voluntary Planning Agreement.

The Lane Cove Section 94 Plan dated August 1996 (revised 16 February 2004) applies to the site. The section 94 plan includes details of anticipated increased demand as a result of new development and links this to an increased demand for public services and amenities for which developer contributions will be sought.

The monetary contribution rate applies to residential, commercial and industrial development. The method of calculating contribution amounts depends on the extent of the redevelopment (net increase between existing and proposed works) and increased population rates. The contribution rate also varies subject to movements in CPI.

It is understood that Lane Cove Council will calculate an acceptable contribution rate during the detailed DA stage. Payments of the contribution amounts will be made in a staged sequence that reflects the staged construction of the development.

10.11 Flooding (SEAR 13)

SEAR 13 requires that the application addresses the following:

Assess any flood risk on site and consideration of any relevant provisions of the NSW Floodplain Development Manual (2005), including the potential effects of climate change, sea level rise and an increase in rainfall intensity.

The subject site is not identified as a flood prone area and therefore no flood investigation or mitigation works are required in this instance.

The potential effects of climate change include sea level rise; varied climatic conditions that may impact on temperatures, rainfall intensity and bushfire risk. Due to the topographical location of the site, future sea level rise will also not impact the proposed development on the site.

As outlined in SEAR 8, ESD measures will be implemented in the building for passive heating and cooling, rainwater reuse and water saving measures. The incorporation of passive ESD measures in the building will help manage climate variability over the longer term.

The sites location on a crest draining towards Gore Creek will ensure that any increases in rainfall intensity will be effectively managed through direction of overland stormwater flows primarily via the vegetated riparian corridor that runs along the western boundary of the site. Further the use of on-site detention and water quality measures will ensure that any flow off the site will meet the pre-development flows and reduce the potential for impacts on downstream flooding.

10.12 Bushfire (SEAR 14)

SEAR 14 requires that the application addresses the following:

Address bushfire hazard and if required, prepare a report that addresses the requirements for Special Fire Protection Purpose Development as detailed in Planning for Bush Fire Protection 2006 guidelines.

The subject site has been identified on Lane Cove Council's Bushfire Prone Lane Map as containing category 2 vegetation and is located within a 30m buffer zone of designated category 2 vegetation. A bushfire hazard assessment report has been prepared by Building Code & Bushfire Hazard Solutions and is included in Appendix J. The purpose of this report is to provide independent bushfire hazard determination together with appropriate recommendations and mitigation measures.

The vegetation identified as being the hazard is located to the southwest both within a small portion of the subject site and within Gore Creek Reserve.

The following recommendations have been provided as a minimum necessary for compliance *Planning for Bushfire Protection 2006* and Australian Standard 3959 'Construction of buildings in bushfire-prone areas' 2009.

General

1. That the development be in accordance with the Site Plan by Bickerton Masters Architecture (project 1213, dwg S.02, rev T3, dated 12/03/2018).

Asset Protection Zones

2. That all grounds within the subject site excluding the rainforest vegetation in the southwest corner (see Image 01 p13) and the heritage land associated with Pallister House (being Lot 4 DP 584287) be managed as an Inner Protection Area.
3. That the grounds within Lot 4 DP 584287 be subject to a specific VMP to ensure it is not a bushfire threat to any development and this will include:
 - Maintaining ground fuels to low level grasses less than 100mm in height;
 - No surface fuel accumulation (bark leaf and twigs) greater than 4 t/ha.
 - Restricting any shrub gardens to no more than 20% of the area and maintaining 2 – 5 metre separation from any tree limb to a shrub garden.
4. That a Fuel Management Plan be established to ensure the ongoing management of the Asset Protection Zones.

Construction

5. That new construction for the proposed new seniors living apartment buildings and Café shall comply with section 5 (BAL 12.5) Australian Standard AS3959- 2009 "Construction of buildings in bush fire-prone areas" and section A3.7 Addendum Appendix 3 of "Planning for Bush Fire Protection".

Note: All other buildings inclusive of the hospital and villas are located greater than 100 metres from the hazard interface and consequently they are in an area determined to be BAL Low, attracting no specific construction requirements under AS3959 – 2009.

Landscaping

6. That any new landscaping within the Asset Protection Zone is to comply with Appendix 5 'Landscaping and Property Maintenance' under Planning for Bush Fire Protection 2006.

Emergency Management

7. That a bushfire emergency / evacuation plan is prepared constant with the NSW Rural Fire Service Guidelines for the Preparation of Emergency / Evacuation Plan.

Water Supply

8. That new hydrants be installed in accordance with AS2419.1 – 2005

Access

9. That the new access roads are to comply with sections 4.2.7 & 4.1.3 of Planning for Bush Fire Protection 2006.

The proposed development has been designed in accordance with these recommendations. It can therefore be concluded that the proposed redevelopment of Greenwich Hospital campus can be safeguarded from the danger of bushfires.

11 Consultation

Consultation has been undertaken with the following stakeholders in accordance with the SEARs and has formed an integral part of the concept proposal. A summary of the consultation process, issues raised and where the design of the proposal has responded to these issues is included below.

- The Department of Planning and Environment
- Roads and Maritime Services (RMS)
- Lane Cove Council (LCC)
- Rural Fire Service (RFS)
- Office of Water
- Office of Environment & Heritage (OEH)
- Transport for NSW (TfNSW)
- Local Aboriginal Land Council
- Local Residents

11.1 Lane Cove Council Consultation

A meeting was held with Lane Cove Council on 25 October 2017 to discuss the proposed redevelopment of Greenwich Hospital campus. The Lane Cove Council Officers who were present at the meeting are listed below and the proposal was also referred to various Council staff for comment. The key issues raised at this meeting are summarised in Table 16. Meeting minutes are provided in Appendix O.

- Michael Mason – Executive Manager – Environmental Services
- Rajiv Shankar – Manager – Development Assessment
- Diep Hang – Senior Town Planner

Table 16: Lane Cove Council Consultation Summary

ISSUE	COUNCIL COMMENT	RESPONSE
Statutory Context	<ul style="list-style-type: none"> • Refer to meeting minutes detailing statutory context to be considered. 	Relevant statutory items have been considered in this environmental impact statement. Refer to Sections 6, 7 and 8.
Engineering	<ul style="list-style-type: none"> • The site is burdened by an existing Council stormwater pipe. No new infrastructure will be permitted over the existing pipe line in accordance with Part O of LCDCP 2010. • All new impervious areas should where practical drain into the existing stormwater line. 	A stormwater management plan and report have been prepared with regard for the existing site condition, site constraints, intended use and Part O 'Stormwater Management' of Lane Cove DCP 2010.
Car Parking	<ul style="list-style-type: none"> • All proposed new parking areas and driveways need to be designed to meet AS2890 series. • Any significant excavation or basement parking if any will require a geotechnical report to support the application. 	A traffic and parking impact assessment report has been prepared in accordance with the requirements of the Lane Cove Council DCP 2010 and the Road and Maritime Service's 'Guide to Traffic Generating Developments'. Proposed parking areas and driveways have been

ISSUE	COUNCIL COMMENT	RESPONSE
		<p>designed to meet AS2890 series.</p> <p>A preliminary geotechnical assessment was undertaken in 2010 to assess the existing stability of the site, evaluate current levels of risk and provide recommendations regarding future development at the site. Additional geotechnical investigations will be provided with the subsequent detailed development application.</p>
Consultation	<ul style="list-style-type: none"> Consultation with the adjoining neighbours and the community is recommended at the early concept stage to consider relevant and raised concerns at the design stage. 	Consultation with the community in accordance with SEAR 11. Refer to Section 11.3 below.
Liaison with External Bodies	<ul style="list-style-type: none"> Consultation with the Office of water is recommended to confirm if works proposed would require a controlled activity approval. Liaison with Ausgrid is recommended to establish whether the proposal would require additional services or the need for a substation. 	<p>Consultation with relevant stakeholders has been undertaken in accordance with SEAR 11. Refer to Section 11.2 below.</p> <p>Liaison with Ausgrid will be undertaken at the detailed DA stage.</p>
Construction Management Plan	<ul style="list-style-type: none"> Construction management plan is required. Construction parking impacts to be addressed. 	A construction management plan will be provided with the subsequent detailed development application.
Environmental Management Plan	<ul style="list-style-type: none"> An environmental management plan is required, specifically addressing dust management and sediment and erosion controls. 	An environmental management plan will be provided with the subsequent detailed development application.
Acoustic Report	<ul style="list-style-type: none"> Acoustic report to address the overall use of the facility including times of operation and the impact of plant and equipment. 	The existing hospital arrangements and activities will continue and seniors living units will not generate intrusive noise. If required, by an acoustic report can be prepared at the subsequent detailed development application.
Waste Management Plan	<ul style="list-style-type: none"> Waste management to be addressed – capacity for waste and recycling. 	A waste management plan will be provided with the subsequent detailed development application.

11.2 Authority Consultation

The issued SEARs required consultation with a number of government authorities. Table 17 includes a summary of the consultation, when it was undertaken, responses received, and any actions required to implement the responses. Copies of the correspondence to the Authorities and the minutes from the meetings are included in Appendix O.

Table 17: Authority Consultation

AUTHORITY	CONSULTATION PERIOD	RESPONSE RECEIVED	ACTION
Roads and Maritime Services (RMS)	25 October 2017	<p>RMS have requested that the following items are included in the traffic and parking report:</p> <ul style="list-style-type: none"> • Pre and post traffic generation and its impact on the road network; • Traffic generation for the proposed development needs to be support by a survey of similar developments; • Proposed changes to the slip lane to ensure the access arrangements meets the current standards; and • Car parking arrangements and its compliance with Australian standards. 	A traffic and parking impact assessment has been prepared with regard for the items raised by Roads and Maritime Services (RMS).
Rural Fire Service	26 October 2017	No objection held in principle to the proposed approach. A bushfire report shall be submitted with the development proposal which clearly outlines the above and provides information to support the hazard assessment.	A bushfire hazard assessment report has been prepared by Building Code & Bushfire Hazard Solutions (refer Appendix J). The purpose of this report is to provide independent bushfire hazard determination together with appropriate recommendations and mitigation measures.
Office of Water	October 2017	Contact was made with Office of Water to provide comment on and meet with the proponent to discuss the proposal. No response was received.	
Office of Environment & Heritage	October 2017	Contact was made with Office of Environment & Heritage to provide comment on and meet with the proponent to discuss the proposal. No response was received.	
Transport for NSW	October 2017	Contact was made with Transport for NSW to provide comment on and meet with the proponent to discuss the proposal. No response was received.	

11.3 Community Consultation

A community consultation 'drop-in session' was held at Pallister House on 2 November 2017 from 5.00pm to 7.00pm. A letter box drop was undertaken, inviting neighbours and residents in proximity to Greenwich Hospital campus to the consultation evening. Community groups, stakeholders and local members were invited by email.

A summary of key issues is provided below in Table 18. HammondCare have replied directly to all submissions received by the community.

Table 18: Community Consultation

ISSUE	RESPONSE
Privacy/Overshadowing	The concept proposal has been architecturally designed to protect the amenity and privacy of nearby residential developments through varying setbacks, landscaped areas, built form and separation. It should be noted that topography and existing vegetation contributes to the bulk of shadowing over the southern boundary of the site. Potential overshadowing impacts have been minimised by building separation and generous setbacks to adjoining properties.
Acoustic Impacts	The existing hospital arrangements and activities will continue and seniors living units will not generate intrusive noise. If required, an acoustic report can be prepared with the subsequent detailed development application.
Traffic/Parking	The Traffic and Parking Impact Assessment concludes that the subject site is suitable for the proposed intensified use. The proposed development has been designed with regard for the impact of traffic, vehicle access, parking and safety. The development is considered to have negligible effect on the safety and operating outcome of the surrounding transport network. Approximately 329 on-site parking spaces are proposed to accommodate the proposed development.
Access	The proposed development will generally maintain the existing access arrangement, with the exception of the unsignalised eastern access on River Road – this access will be restricted to left in/left out to address the sight distance deficiency to the east due to the crest.
Height/Visual Impacts	Photo montages indicate that the topography of the site and existing vegetation assist in reducing the prominence of the proposed development from River Road, St Vincents Road and various vantage points. Refer to Section 10.1 and in Appendix B.
Construction Issues	A construction management plan will be provided with the subsequent detailed development application.
Pallister House	Pallister House will be retained and continue to fulfil its present functions. No demolition, alterations or additions are proposed to Pallister.
Seniors living units (St Vincent's Road)	The Seniors Living units addressing St Vincents Road are small scale and light weight. They have been designed to sit below the canopy of existing trees and below Pallister, to provide a domestic scale along St Vincents Road.
Trees/Vegetation Removal	A comprehensive arborist report accompanies this EIS. The arborist report identifies trees worthy of retention and trees that can be removed due to their condition and significance. The recommendations of the Arborist report have informed the layout

ISSUE	RESPONSE
	and built form of the development to conserve significant trees and large trees to the perimeter of the site.
Bushfire Risk	A bushfire hazard assessment report has been prepared by Building Code & Bushfire Hazard Solutions. The proposed development has been designed in accordance with the recommended mitigation measures defined in this report. It can therefore be concluded that the proposed redevelopment of Greenwich Hospital campus can be safeguarded from the danger of bushfires.

Consultation was also held with the local Aboriginal communities as part of the preparation of the Aboriginal Cultural Heritage Assessment, the results of which are included in that report in Appendix R. No significant objections were raised to the proposal, however management measures for construction have been recommended in sensitive locations on the site.

12 Justification for the Proposed Development

12.1 Justification

The public interest is best served by promoting sustainable development that is rational, orderly and economic. The proposal is permissible with consent under the SP2 Infrastructure (Health Services Facilities) zoning of the site and SEPP Housing for Seniors; and will generate positive social, environmental and economic benefits. The following justification is provided in support of the proposed redevelopment of Greenwich Hospital campus;

- The proposal addresses an increase in demand and expectation for high quality health care services and facilities;
- The location of the site is highly suitable for the proposed development, given its proximity to public transport networks and a range of services and facilities; and
- Potential impacts arising from the proposed development can be mitigated, ensuring there will be no long-term or unreasonable impacts to the environment or surrounding developments.

12.2 Biophysical Considerations

This environmental impact statement and the various sub-consultant reports have been prepared to address the likely impacts of the proposed development on the environment. A number of mitigation measures and recommendations have been adopted to ensure that the proposed development will not result in any unacceptable impacts to the biophysical environment.

12.3 Economic Considerations

The proposed redevelopment of Greenwich Hospital campus will result in significant economic benefit on a local and regional level. The proposed development facilitates economic growth by replacing existing buildings with a campus of co-located, high quality health care facilities. In addition, the proposal will result in additional employment opportunities for the local community, including opportunities during construction for local tradespeople and business, as well professional roles for approximately 174 staff.

12.4 Social Considerations

The proposed development has been designed in accordance with existing and projected future needs of the community by delivering a high-quality, integrated facility that meets the day to day needs of residents, patients, visitors and the community. In addition, the proposal is a significant opportunity to futureproof the site through flexible and sustainable building design. Social benefits of the proposal include:

- The development will embrace those who are elderly, frail, disabled, lonely and those looking for security;
- Seniors living units and hospital facilities will provide accommodation and improved aged care services for a variety of people as they age;
- Increased diversity in housing stock allow ageing residents to stay in the local area, minimising social displacement; and
- Spaces, facilities and informal public access ensure visitors to the site and the wider community feel welcome.

12.5 Ecological Sustainable Development

The proposed redevelopment of Greenwich Hospital campus has been designed with regard for key ecological sustainable development (ESD) principles as defined in Clause 7(4) of Schedule 2 of Environmental Planning and Assessment Regulation 2000.

A detailed ESD report can be provided with the detailed development application.

The proposal achieves the following ESD outcomes:

- The proposal has been designed to minimise building footprint and maximise deep soil planting;
- During the demolition and construction process, materials will be recycled and reused where possible;
- Building materials and fabrics will be selected according to their environmental performance and rating; and
- A number of mitigation measures and recommendations have been adopted to ensure the proposed development does not result in any unacceptable impacts to the environment.

Table 19 outlines the principles of ecologically sustainable development as defined in Clause 7(4) of Schedule 2 of Environmental Planning and Assessment Regulation 2000.

Table 19: Principles of ecologically sustainable development

PRINCIPLE	COMMENT
(a) the precautionary principle , namely, that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. In the application of the precautionary principle, public and private decisions should be guided by: (i) careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment, and (ii) an assessment of the risk-weighted consequences of various options.	This EIS and specialist consultant reports recommend mitigation measures to avoid, minimise and offset potential impacts. This proposed redevelopment of the site will not result in any serious or irreversible environmental impacts.
(b) inter-generational equity , namely, that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations	The proposed development responds to the need for additional health care services. The proposal has been designed to ensure the health, diversity and productivity of the environment is maintained and enhanced for the benefit of future generations.
(c) conservation of biological diversity and ecological integrity , namely, that conservation of biological diversity and ecological integrity should be a fundamental consideration,	A biodiversity assessment has been prepared by Keystone Ecological to consider biodiversity matters and identify protective measures to minimise the likely impacts of the proposed development. Refer to Section 10.7.
(d) improved valuation, pricing and incentive mechanisms , namely, that environmental factors should be included in the valuation of assets and services, such as: (i) polluter pays, that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement,	The cost of development and associated quantity surveyors report includes measures to ensure an appropriate level of environmental performance is achieved.

PRINCIPLE	COMMENT
<p><i>(ii) the users of goods and services should pay prices based on the full life cycle of costs of providing goods and services, including the use of natural resources and assets and the ultimate disposal of any waste,</i></p> <p><i>(iii) environmental goals, having been established, should be pursued in the most cost effective way, by establishing incentive structures, including market mechanisms, that enable those best placed to maximise benefits or minimise costs to develop their own solutions and responses to environmental problems.</i></p>	

13 Environmental Risk Assessment and Mitigation Measures

Table 20 provides an assessment of environmental risk to identify the potential environment impacts associated with the proposed development and mitigation measures to avoid, minimise and offset predicted impacts.

Table 20: Environmental Risk Assessment and Mitigation Measures

RISK	MITIGATION MEASURES
Built Form and Urban Design	<ul style="list-style-type: none"> The proposed development has been articulated in depth and height, allowing for adequate separation and generous setback to reduce the appearance of bulk and scale; The form of the building aims to address the sites topography to minimise visual impacts to the surrounding area; and The architectural form assists in creating visual interest and will contribute to public amenity.
Amenity	<ul style="list-style-type: none"> The retention of significant trees, landscaped areas and communal open space areas create a visual buffer and improves the amenity of the streetscape; The proposed topography of the site and existing vegetation assist in reducing the prominence and bulk of buildings from a number of vantage points; No significant views or views of the sky line will be impacted as a result of the development; and Generous setbacks preserve levels of privacy, sunlight and visual amenity enjoyed by neighbouring dwellings.
Transport and Accessibility	<ul style="list-style-type: none"> On-site parking is proposed to accommodate the proposed development; The proposed internal road network has been designed to be practical and safe, ensuring that all traffic generated by the development can enter and exit the site in a forward direction; and The integrated built form with connecting walkways and lifts will enable future aged care residents to traverse the site and access public transport in accordance with accessibility guidelines.
Ecologically Sustainable Design (ESD)	<ul style="list-style-type: none"> The proposal has been designed to minimise building footprint and maximise deep soil planting; During the demolition and construction process, materials will be recycled and reused where possible; Building materials and fabrics will be selected according to their environmental performance and rating; Predominantly north-eastern orientation of buildings to maximise solar access and minimise heating and lighting requirements; Cross-ventilation to minimise air conditioning requirements for the seniors living units; Rainwater tanks for reuse with landscape irrigation; OSD tanks and water quality treatment to control stormwater run-off and maintain downstream water quality; Retention of substantial stands of vegetation; A number of mitigation measures and recommendations have been adopted to ensure the proposed development does not result in any unacceptance impacts to the environment; and

RISK	MITIGATION MEASURES
	<ul style="list-style-type: none"> Additional building related energy and water saving measures will be specified in the subsequent detailed DA stage and will be supported by an ESD Report.
Noise and Vibration	<ul style="list-style-type: none"> The site currently operates as a hospital and the proposed redevelopment is unlikely to result in additional noise and vibration levels. The main noise sources during operation will be generated by car movements and mechanical plant; The proposed basement car parking will aid in the reduction of car movement noise, compared with the current parking arrangement, whereby cars are parked at grade across the site without any physical barriers; The upgraded hospital will result in the replacement of ageing mechanical plant with modern equipment and appropriate acoustic attenuation; and Noise and vibration during construction will be managed through appropriate management measures similar to those included in the acoustic assessment included in Appendix Q.
Biodiversity	<ul style="list-style-type: none"> The proposed development will have negligible impact on existing Riparian Lands or bushland areas adjoining the site; and Direct impacts on natural vegetation and habitats have been minimised by the location of new buildings within previously disturbed areas. Protective measures to retain trees during construction will be implemented.
Non-Aboriginal Heritage	<ul style="list-style-type: none"> Communal open space areas have been designed along the primary axis, allowing for long distance views of Pallister from River Road; The proposal includes increased landscaped areas, planting and pathways to support and reinforce the 'gardensque' character of the setting; and The bridle path is to be conserved and reinstated where currently lost due to open ad hoc parking areas and vehicular access arrangements. It is anticipated that the immediate setting of Pallister will be improved as a result of the proposed development.
Aboriginal Heritage	<ul style="list-style-type: none"> Direct impacts on Aboriginal heritage have been minimised by the location of new buildings within previously disturbed areas; Development within potentially sensitive areas have been conceived as low-density residential spaces that employ a pier and beam structural system to avoid extensive excavation; and Management measures have been included in the ACHA report in Appendix R and will be implemented during construction.
Bushfire	<ul style="list-style-type: none"> The majority of the works are occurring outside land mapped as a bushfire hazard and buffer zone from a bushfire hazard; and A bushfire hazard assessment report has been prepared by Building Code & Bushfire Hazard Solutions. The proposed development has been designed in accordance with the recommended mitigation measures defined in this report.
Stormwater	<ul style="list-style-type: none"> The proposed redevelopment of Greenwich Hospital campus is capable of incorporating appropriate stormwater devices to provide acceptable levels of water quality and maintain pre-development site discharge.

RISK	MITIGATION MEASURES
Hazardous and Offensive Development (State Environmental Planning Policy No 33)	<ul style="list-style-type: none">• The redevelopment of Greenwich Hospital campus will continue to run in a similar manner as the existing hospital and no substantive changes to operational procedures or the materials stored on site are anticipated.
Contamination	<ul style="list-style-type: none">• A Preliminary Site Assessment was undertaken to determine whether the site is subject to contamination. The report concluded that the likelihood of significant contamination is low, and a detailed site assessment should be undertaken for the development application stages.
Geotechnical	<ul style="list-style-type: none">• A preliminary geotechnical assessment was undertaken in 2010 to assess the existing stability of the site, evaluate current levels of risk and provide recommendations regarding future development at the site;• Additional geotechnical investigations will be provided with the subsequent detailed development application.

14 Conclusion

The Environmental Impact Statement has been prepared in accordance with the Environmental Planning and Assessment Act 1979, Environmental Planning and Assessment Regulation 2000 and Secretary's Environmental Assessment Requirements.

Our assessment confirms that the concept proposal warrants approval for the following reason:

- The subject site is suitable for the proposed development and will not result in any significant or adverse overshadowing, acoustic, privacy or amenity issues;
- The design and built form of the proposed development has been articulated to complement the streetscape and surrounding locality;
- The design of the building will contribute to visual interest and overall amenity of the area;
- Mitigation measures have been identified to manage potential environmental risks and construction impacts; and
- The development will facilitate additional employment opportunities during and after construction.

The proposal represents rational, orderly, economic and sustainable use of the land and should therefore be supported.

*Appendix A – Secretary's Environmental Assessment
Requirements
NSW Department of Planning and Environment*

Provided under separate cover

Appendix B – Architectural Plans
Bickerton Masters Architecture

Provided under separate cover

Appendix C – Architectural Design Statement
Bickerton Masters Architecture

Provided under separate cover

Appendix D – Landscape Plans
Complete Urban

Provided under separate cover

*Appendix E – Site Survey
Lockley Land Title Solutions*

Provided under separate cover

Appendix F – Quantity Surveyors Report
Slattery QS

Provided under separate cover

Appendix G – Traffic & Parking Impact Assessment Report
Barker Ryan Stewart

Provided under separate cover

Appendix H – Heritage Impact Assessment
NBRS Architecture

Provided under separate cover

Appendix I – Civil Engineering
Barker Ryan Stewart

Provided under separate cover

*Appendix J – Bushfire Hazard Assessment
Building Code & Bushfire Hazard Solutions*

Provided under separate cover

Appendix K – Preliminary Geotechnical Assessment
Jeffery and Katauskas Pty Ltd

Provided under separate cover

Appendix L – Arborist Report
Redgum

Provided under separate cover

Appendix M – Archaeological Assessment and Impact Statement
GML Heritage

Provided under separate cover

Appendix N – Biodiversity Development Assessment Report
Keystone Ecological

Provided under separate cover

Appendix O – Consultation

Provided under separate cover

Appendix P – Preliminary Site Assessment
Douglas Partners

Provided under separate cover

Appendix Q – Acoustic Assessment

Acoustic Logic

Provided under separate cover

Appendix R – Aboriginal Cultural Heritage Assessment
Heritage Connections

Provided under separate cover

Appendix S – Owners Authority
HammondCare

Provided under separate cover