

12 March 2024

2190376

Tahlia Sexton  
A/ Principal Case Manager  
Office of the Independent Planning Commission  
Suite 15.02, Level 15, 135 King Street  
Sydney NSW 2000

Dear Tahlia,

**RESPONSE TO REQUEST FOR INFORMATION  
SSD 13619238 (GREENWICH HOSPITAL REDEVELOPMENT – DETAILED DESIGN)**

This letter has been prepared by Ethos Urban on behalf of HammondCare in response to the Request for Information (RFI) for SSD 13619238 issued by the Independent Planning Commission (IPC) dated 27 February 2024. The following documentation have been attached to this letter:

- Submitted Construction Management Plan prepared by Roberts Co (**Attachment A**);
- Submitted Geotechnical Investigation prepared by JK Geotechnics (**Attachment B**);
- Submitted Flood Assessment prepared by Solutions Water Modelling (**Attachment C**); and
- Submitted Vegetation Management Plan prepared by Travers Bushfire & Ecology (**Attachment D**).

A response to each of the items raised within the RFI has been provided in the table below.

Item	Response
<b>1. Landscaping and Vegetation</b>	
a. clarification as to whether any of the trees marked for retention along the western boundary, specifically in proximity to 117A and 117B River Road, Greenwich, have been previously removed;	<p>The 117a and 117b properties are adjacent to the southwest and western boundary of the site at the base of an embankment. The area is subject to a weed eradication plan prepared by Travers Bushfire &amp; Ecology in November 2020 (as noted in the submitted Vegetation Management Plan at Appendix H of the EIS; provided at <b>Attachment D</b> for the IPC's information) and a bushfire APZ.</p> <p>The weed management plan identifies listed tree weed species that that are captured in the Arborist report and tree removals and retention plan as being retained. Several trees identified in the Arborist report for retention were weed species and subject to a Bushfire Protection Assessment (Appendix HH of the EIS). As such any tree species under 4m that is on a weed species list will have been removed during weed clearing and revegetation works.</p> <p>This includes any Hackberry (<i>Celtis</i> sp.) <i>Celtis sinensis</i> and <i>Celtis australis</i> which are both listed as exempt species within Lane Cove Councils Private Tree guidelines and do not require a permit/approval to remove.</p>
b. clarification of proposed quantity, species, height at time of planting and height at maturity of vegetation proposed to be used for screening at the western boundary; and	<p>The submitted Vegetation Management Plan prepared by Travers Bushfire &amp; Ecology (<b>Attachment D</b>) lists out the vegetation proposed through the revegetation plan that extends along the boundaries and adjacent embankment.</p> <p>Page 4 of the document lists out the details of the revegetation planting.</p> <p>The planting density is to be 1 tree every 50m<sup>2</sup>, 1 Sub-canopy every 30m<sup>2</sup>, 1 shrub per 10m<sup>2</sup> and 3 groundcovers per 1m<sup>2</sup>.</p>

c. clarification of what vegetation will be removed in order to meet the APZ requirements along the western boundary and within the bushland regeneration area.

The vegetation will be managed to ensure that fuel loading meets the requirements of the Outer Protection zone of the APZ which is 8T/ha. Existing trees have been pruned to reduce fuel loading and canopies reduced so that the below conditions are maintained.

The weed species trees that have been retained to maintain screening and privacy to the boundary will be removed once the revegetation plantings are succeeding these trees in providing the same screening and privacy effect.

Trees are to be maintained to ensure:

- Canopy cover does not exceed 30%; and
- Canopies should be separated by 2 to 5m.

Shrubs are to be maintained to ensure:

- They do not form a continuous canopy;
  - Shrubs should be no more than 20% of ground cover; and
- Leaves and debris should be removed.

## 2. Construction Methodology

a. clarification of the methodology proposed for excavation, noting that at the Site Inspection for the Project, the Applicant outlined that rock breaking would not occur, instead that sawing would be undertaken, however the submitted Construction Management Plan identifies the use of rock breakers; and

The latest Construction Management Plan (CMP) prepared by Roberts Co (Appendix E of the RTS Report; provided for the IPC's information at **Attachment A**) should be relied upon for construction methodology and will inform a detailed Site Environmental Management Plan at construction certificate stage.

The CMP identifies that rock breaking may require small to medium size rock breakers for excavation of low and higher strength bedrock; however, it also notes that alternative excavation techniques including a rock grinder on the excavator, excavator mounted rock saw and ripping tyne attachment, and/or drill and split techniques will be explored and utilised where practicable.

Final methodology will be confirmed at construction certificate stage as is industry standard practice.

b. details on how the Applicant intends on ensuring the stability of the western embankment is maintained and monitored throughout construction

The Additional Geotechnical Investigation prepared by JK Geotechnics (Appendix W of the exhibited EIS; provided at **Attachment B**) notes that the existing fill batter slope over the western embankment is marginally stable and one of the following two options should be utilised to manage impacts of potential batter slope instability:

- Re-profile the batter slope to a flatter slope angle (no steeper than 1 Vertical (V) in 2 Horizontal (H)) and re-vegetate; or
- From the toe of the fill batter slope, project a theoretical failure plane at an angle no steeper than 1V in 2H and locate structures east of this theoretical failure plane line, or extend footings below this theoretical failure plane line and suspended paved areas, sections of buildings etc. between these footings.

The latest Construction Management Plan prepared by Roberts Co (Appendix E of RTS Report; provided at **Attachment A**) acknowledges the above findings, and notes that demolition and excavation will need to be carefully sequenced and completed by suitably experienced contractors to maintain the stability of the fill batter slope over the western end of the site. This includes ensuring that plant, equipment, or stockpiles of material do not operate or are located west of an exclusion zone defined by the theoretical failure plane line provided within the Additional Geotechnical Investigation.

Detailed methodology will be confirmed at construction certificate stage as is industry standard practice, including the need and extent of underpinning, propping and/or wall strengthening measures.

## 3. Stormwater and Sewerage

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a. address the concerns raised by the public submissions regarding the existing stormwater and sewerage issues on adjoining properties including:  
i. how the proposed stormwater management system will improve/eliminate existing stormwater and sewerage impacts on adjoining properties;

Stormwater from the proposed development for minor storm events will be controlled and discharge directly into Council's existing stormwater easement and roads.

For major storm events, the access road has been designed to direct overland flow from the new roads and building to a discharge location clear of adjoining properties. Cut off drains and landscaped berms have been designed to divert stormwater away from neighbouring properties along the southern boundary of the site.

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ii. whether any stormwater is proposed to be diverted or will run through adjoining properties, including 117A or 117B River Road, Greenwich; and

The access road has been designed to divert overland flow from the new roads and building to a discharge location clear of the properties at 117a and 117b River Road. Stormwater from the buildings and access roads will not flow into the low point adjoining these properties.

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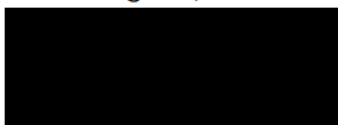
iii. the need to provide permanent on site measures to prevent flood water from overflowing into neighbouring properties on the western boundary

Permanent measures are not considered required to the western boundary as overflow of water across the boundary is not anticipated. As noted within the exhibited Updated Flood Assessment (submitted at Appendix K of the RTS Report; provided at **Attachment C**):

- Under existing conditions, there is an overland path at the western boundary in a 1% AEP event. The proposed development does not create any additional overland paths (refer to Appendix E-1 within the Flood Assessment).
  - Change in flood behaviour because of the proposed development for a 1%AEP event is shown in Appendix E-13 of the Flood Assessment, indicating that there would be a minor reduction in flood levels along the western boundary (in the order of 0.02 - 0.05m).
  - The assessment also compares 0.5% AEP and 0.2% AEP events to the 1% AEP (under proposed conditions), demonstrating minimal difference in the resulting flood risk between the three scenarios. This provides greater confidence that the proposed development will not be subject to increase flood risk under climate change conditions (refer Appendices E-15 and E-16 within the Flood Assessment).
  - Flood impacts have also been assessed in a PMF event and are presented in Appendix E-14 of the Flood Assessment. It demonstrates there is no change in hydraulic hazard in the PMF event, which indicates the distribution and severity of flow under proposed development has not materially changed.
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We trust that the above is sufficient to enable determination of SSD 13619238.

Kind regards,



**Yousheng Li**  
Senior Urbanist



**Karen Armstrong**  
Director

