22 October, 2020.

The Commissioners

Independent Planning Commission

Sydney NSW 2000

Dear Sirs

**RE: Submission on the Redevelopment of Greenwich Hospital for enlargement of Hospital Healthcare Facilities and new Seniors Living Development (SD8699).**

In considering the above proposal for the Greenwich Hospital Redevelopment Concept Plan (Revised) which is currently under consideration by your panel, the Developer, HammondCare, proposes a ‘campus style’ redevelopment of the existing hospital site. The proposal is to redevelop the site with a new Hospital building, a new Respite Centre and two Residential buildings which are proposed under the State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (SEPP Seniors Living). The proposed residential buildings include 89 apartments. The details of the projected number of permanent residents is undisclosed in the proposal. The subject site adjoins my own property which has a common boundary with the south western corner of the hospital site.

I wish to say, Firstly, that the Greenwich Hospital is an important local resource and provides invaluable functions in the matter of palliative & dementia care & rehabilitation services for this area and is valued by the local communities. As such its redevelopment is a very important consideration for its neighbours and clients and we all want the best possible plan for its redevelopment to result from these planning processes.

However, this plan must take into account the area in which the hospital is sited, its nearby neighbours (including its vulnerable school children), the need for its existing and proposed services and their enlargement and the repercussions that would likely arise from the kind of development that is proposed, the latter including impact on its bushland setting, on the state-registered, Heritage-zoned “Pallister House”, the resultant much increased traffic flows, both internal and external and all causative detrimental effects.

**1. My first objection is to the gross height, bulk and scale of the proposed new hospital Health Building.**

In the RtS this is planned at RL80, at 10 stories in height and, despite the podium underneath and the tower being set back above (the developer’s supposed concession to the vast proportion of objections to its original Concept Plan), this is a gross visual intrusion into its local residential area. This Health Building, at the planned height, in itsheight, bulk and scale, would cause the loss of amenity to hundreds of nearby residents, to its north, west, east and south, and it would be incompatible with the current expectations of residents, both in Greenwich and Northwood, where visual, light and noise intrusion into their lives would be a major environmental disaster.

What is more, it is entirely unnecessary, as the hospital tower could be lower in height and lower-lying wings could be built, spreading further out on the site. This would be more harmonious in its residential setting and lessen the impact on the Heritage “Pallister House”, on the streetscape & on the adjoining residents’ R2-zoned 1- and 2-storey houses. This is not an area with a large proportion of its land zoned for industrial buildings such as a hospital – Greenwich Hospital is an anomaly in the area & should be maintained in keeping with its surrounds. If the apartments were not built, the hospital could spread out further across the site and its height be lower and more in keeping with its locale.

**2.Secondly.** This leads me to highlight one of the other great disappointments that HammondCare’s re-development proposal has produced in the very communities that it aims to service.

It is that this company wishes to use the provisions of the SEPP it operates under to **re-purpose a large proportion of the site** (of almost 50% of the proposed development costs & the same in area, leaving aside Pallister House) **to a non-health services function**.

The **Development Type is listed as:**

SP2 zoning for Hospitals, medical centres and health research facilities and apartments are quite outside that category and not “incidental or ancillary” to the hospital.

However, despite the SEPP Seniors Living being permissible on hospital sites, the stated intent of the SEPP is “to make efficient use of existing infrastructure and services”. However, the sterilisation of this land for any future expansion of health services is not considered to be an “efficient use” of the land for the medium to long term. In short, there is an inability for any future expansion of hospital uses if this proposal is supported in its current form.

While the provisions of the SEPP Seniors Living do permit the proposed use of residential accommodation, it is the opinion of professional planners I have consulted that:

“the intention of the SP2 Infrastructure zone – Health Services Facility – would be diluted to such an extent that the principal use of the site is no longer a hospital. The documentation indicates that the cost of the works of $141.5 million is almost evenly split 50-50% across the proposed development for the two (2) proposed uses of hospital and residential accommodation. Further, the proposed floor space calculations indicate that approximately 50% of the proposed GFA would be allocated to the residential accommodation component of the overall redevelopment of the site” (leaving aside the existing “Pallister House”). The proportions are given as:

Health:

* 12,750 sqm, hospital building envelope
* 1,050 sqm “Pallister”

Seniors living:

* 13,000 sqm.

Additionally the capacities of each of the above components are given as: “Hospital – 150 beds and Seniors housing – 89 two-bed units”. Thus the housing component could also hold close to, or exceed, the same number of persons as the hospital.

Furthermore, the site cover of the proposed residential component of this development including internal roadways which are required to service the apartments is in excess of 50% of the site.

These are effectively a commercial investment and the 55-year plus occupants of these units will likely have no need of ancillary facilities for a decade or more. A development should not be driven by, or justifiable, because of funding needs, it ought to stand on its own merits.

Importantly, apartment construction on zoned Health Services’ land, would ensure that this land would forever more be sanitised against further development for the very services it is designed. There is little other suitable land available for hospitals in the lower North Shore.

Also, such Seniors apartments are already in abundance or in planning mode in Lane Cove and would not be needed for very many years. The Lane Cove Council’s submission lists 9 recent applications, 4 of them within 1 km. of the hospital site, so the applicant’s claim to be meeting need in this respect is hardly valid.

In the long term therefore, it is not an efficient use of services and conflicts with the objectives of the overarching zoning of the land.

HammondCare’s Submission to the IPC includes the following paragraph in its Our Vision statement:

“Inclusion of Serviced Seniors Living with care into the home is **integral to address demand as well as to capital fund the proposal.”** The emphasis by emboldening and underlining is mine.

**3.Thirdly**, the proposed 2 large blocks of **Seniors Living units**, of immense height, bulk and scale, are out of place in this residential zone and would grossly overlook residences to the north, west and south of the site.

Importantly, I wish to advise the Commission that the initial public information session between the applicant’s consultants and the immediate community showed the low-scale residential use proposed on the site had a residential development with a maximum of three (3) storeys’ height being planned. My notes from this meeting state this and several other people who attended this meeting have told me they were also given this information. Thus, three storeys are mandated at RL 55.1 and I believe that that should be their limit – if, indeed, they are approved.

In addition, the proposal is far in excess of what was conveyed to the community, which does not instill confidence within the surrounding community nor meet the underlying objectives of public consultation.

The DPIE recommends that the Northern block should be no higher than the existing hospital building at 5 storeys and the southern one no higher than “Pallister House”, equalling 6 storeys, but H/Care has ignored these recommended restrictions on limits in its revised proposal, as well largely failing to address the concerns over many and varied aspects of the Seniors Living Apartments expressed in a very high proportion of submissions to the DPIE relating to the initial Concept Proposal.

It also recommends a transition in height on the western face to limit the impact on nearby residents and this should also be applied to a greater extent than the current RL 56.0 on the southern side of the southern block . In any case, 5 & 6 stories are still much too high and such large multi-dwellings were removed by Lane Cove Council from R2 zoning, showing that they have no place in this locale. (This zoning is mainly restricted to a 9.5m. height control.)

The **Visual Impact** by the LCVIA assesses that the proposal would have moderate to high impact on private properties along Gore St and in Northwood and moderate ones from Bob Campbell Oval, & French St, and the River Rd-St Vincents Street intersection.

Additionally, Figures 47 & 48 show significant winter overshadowing during mornings to 11am over my house and most of its land. This is intolerable & unacceptable.

The Seniors Housing SEPP in Clause 33 Neighbourhood and Streetscape requires:

1. “…that new buildings contribute to the quality and identity of the area;
2. “retain, complement and sensitively harmonise with any heritage conservation areas in the vicinity and any relevant heritage items that are identified in a local environmental plan”;
3. “maintain reasonable neighbourhood amenity and appropriate residential character by –
4. providing building setbacks to reduce bulk and overshadowing, and
5. using building form and siting that relates to the site’s land form, and
6. adopting building heights at the street frontage that are compatible in scale with adjacent development, and
7. considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours, and…..”

It is not evident in the Revised Proposal that the above requirements have, by any means, been met. If asking the question to these points as to their applicability to the site, my answers would have to unequivacably be “NO”. On the points in (c) alone, the whole project is out of harmony with the neighbourhood, the setbacks are insufficient to minimise their height and bulk sufficiently to be inoffensive to residents, the buildings do not relate to the land form, in that the Seniors Housing block to the south is insufficiently stepped down to follow the land form, with the result that this building towers over residents below it, over Bob Campbell oval and over the Gore Creek Valley and present an intimidating form to those across the Valley in Northwood. Nor are any of the proposed buildings compatible in scale with adjacent development and the walls of both Seniors blocks intrude into the visual and sky space of nearby residents. When the Commissioners examine the above points in Clause 33 in relation to the actual site, I believe they would have to concur with me and many others that the Revised Proposal fails on all counts.

I do not agree that justification has been provided within the application to to satisfy the above. Of note, the desirable elements of the neighbourhood have not been expressed adequately within the documentation. The approach into this neighbourhood reveals a dominance of single detached dwellings within landscaped settings and a dominance of urban bushland. The natural landscaped areas on the eastern side of the hospital grounds provide a significant buffer between the built development located on the hospital site and low density development of the eastern side of St Vincents Street. This setting continues into the hospital site and provides spatial separation around the Heritage Item, which also includes the curtilage of the building.

It further appears that the requirements of fire safety will require understories to be limited to reduce fuel loads. Given the proximity of my home to the proposed multi-storey apartments it is unlikely that any form of vegetation would be sufficient to screen my home from the new development and it towering over my whole property.

If the Commissioners make the decision to insist on reduced height and bulk profiles of the Seniors Apartments for all the reasons given or, better, to rule against their being built, the neighbourhood would be spared the excesses that are currently proposed.

**4. Environmental Impacts.**

* **To begin, the 6-foot high Elevated Roadway** running around the back of the site will cause huge noise, dust and visual impact, at all hours of the day & night, for evermore for the residents in Gore St behind. There is no good reason for this road to be elevated and it should be kept at ground level. Apartments and their access roads would take bushland and valuable wildlife habitat that many have worked hard to preserve, including Lane Cove Council.
* Tree Retention and Health. The plans show that 86 trees will be removed (in addition to those that have already been removed or have died) and only 60 will be planted. I appreciate that many important trees will be retained, but many are planned to go and new plantings cannot take their place as “mature specimens”.
* The developer’s report states that a “significant area of excavation is proposed for the Hospital, Seniors Apartments and the Car park”, but the size and depth of this will adversely affect the longevity and viability of large trees on the site, especially those on the southern border and within the existing Heritage Wildlife corridor. This excavation would disrupt the groundwater supply which seeps downhill from the heights on the north side of River Road, through the site and down to Gore Creek, and whilst so flowing it supplies essential deep-level water to those trees. If this is diverted or hindered, the likelihood of those trees’ survival would be minimal and certainly compromised, with the result that they will at some time fail. (One of those trees is a huge Eucalyptus ‘Grandis’, the tallest tree that grows in NSW and is a magnificent specimen and rare, especially in urban habitat.) When either of the 2 largest trees on the southern boundary fail, it will fall on houses in Gore Street bordering the site, specifically my house, killing all those inside. This is a matter of life and death to me and others living nearby, as well as a hazard to the existing environment.
* Visual and aural privacy. Given the proximity of the closest residential apartments to the southern boundary there would be a consequential loss of aural and visual privacy to me, which would be made worse by the inclusion of balconies to the south, where residents there would expect to gain “water views”.
* Lights, visitor and service people and traffic movements causing noise and odors. Given that HammondCare intends to operate its facility for 24 hours per day, 7 days per week, these resultant environmental impacts will seriously affect all close-by residents. Even the lights and noise from existing middle-of-the-night traffic is disruptive of sleep for residents as far away as Northwood.
* Street Traffic. Traffic along River Road is already at a highly-congested rate during morning and afternoon peak times, viz. 7:15 – 10:00 am and 3:00 – 6:30 pm. These are the majority of the day for most people and, by increasing the traffic immeasurably, it is certain that accidents will occur. In particular, school children will be at risk, as the road is too narrow to permit a purpose-built lane for school pick-ups and drop-offs and, when driver frustrations build up, maybe due to banked up parents’ cars, accidents are more likely to occur. This most important matter has not been seriously addressed in the Proposal and, to my mind, it is a “must”. Additionally, egress and exit from St Vincents Road to/from River Road will be difficult and hazardous.

**5. Heritage matters and the Respite Centre**.

* The total area of Lot 4 is part of the Pallister House grounds and, as such, is protected under the NSW Heritage Act, making it illegal to build anything on it, including a Respite Centre. The siting of a 3-storey respite centre on Heritage-zoned land is an improper use of that land. That Lot is also part of the remnant bush and gardens of Pallister House and deserves to be preserved for that reason alone. The height of the proposed main hospital building causes it to dominate Pallister House and forever impair the immediate environment of this Heritage-registered grand residence. Pushing the hospital building back further from River Road will only cause it to loom further over Pallister House.
* The Respite Centre should be included in the main hospital building or the central zone, as it would be difficult to access by people needing it and their carers, as it is out of the-way and no nearby parking is available.

**In conclusion.**

Overall, the proposal would fail to provide a good planning outcome for the immediate community, the wider community and myself on key aspects including but not restricted to –

• the retention of land for health services for which the site has been zoned for;

• loss of amenity to the surrounding residential community due to a combination of factors including reductions in aural and visual privacy to dwellings and outdoor spaces;

• visual intrusion into current outlooks from homes within this neighbourhood due to the height of the Seniors residential apartments which are proposed;

• removal of such a large proportion of trees on the site;

• consequential loss of a buffer zone which has existed between the hospital and adjacent residential properties since the hospital was first developed in the 1960’s;

• loss of habitat for which this area is renowned;

* destruction of the heritage significance of the heritage item by development of the curtilage of the building where no need has been demonstrated;

• increased traffic onto and off the site and the need to construct internal roadways which would not be required if the site was retained for its primary use under the zoning of health services facility use, and

• change to the existing character of this precinct and to the adjoining properties and to many of the surrounding properties.

I consider that the size of this development is too large. It is far too high and too big for the area. I ask that the size and height be reduced to a more acceptable/suitable level to comply with planning law that it be compatible with its neighbourhood.

* The residents of the area are deserving of better amenities, infrastructure and services as well as a plan for roads with less congestion rather than more seniors units living. The traffic around the intersection of River Road and both St Vincents Road and Greenwich Road is already at capacity and accidents are likely if the plan proceeds as the developer presents.

I ask that the Commissioners kindly give weight to the arguments I have given in this my Submission and reject this development application for one of much smaller sized structures, one allowing for future development of hospital facilities and one more in tune with the residential area in which the Greenwich Hospital is sited.

**Hilma A. Else**

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