

Redevelopment of Greenwich Hospital SSD-8699

Submission to Independent Planning Commission

I would like to submit the following comments on the current concept proposal for redevelopment of Greenwich Hospital. I am a long-term Lane Cove resident with a keen interest in bushland as evidenced by active membership of Council's Bushland Management Advisory Committee. This submission is made on my own behalf as a resident, but it will focus predominantly on bushland, native vegetation, biodiversity and related matters.

I fundamentally disagree with two important aspects of the DPIE Assessment report for this development:

1. That a Biodiversity Development Assessment Report (BDAR) that only considers biodiversity impacts on the development site itself is sufficient. This site is not 'surrounded by urban development' (Assessment Report p.44). It lies adjacent to E2 zoned bushland on the western side. Intensive development on sites above bushland slopes pose considerable threat of impacts on downslope bushland. Such developments gain considerable amenity advantages from their location adjacent to bushland that adds to their value. They must therefore protect that asset and they have a substantial responsibility to ensure there are no impacts from their development on that bushland.

In addition, habitat does not stop at a lot boundary. Sites adjacent to bushland have multiple biodiversity relationships with that bushland and they must be considered as a unit from a biodiversity perspective.

2. The statement (p.82) that *the proposal would result in the loss of biodiversity values on the site, but the impacts can be adequately compensated* (p.82).

Any loss of native vegetation and habitat in Lane Cove should be avoided, and the use of biodiversity offsets to 'compensate'. Purchasing offsets which may be within 100km of the development site for vegetation and anywhere in NSW for animals is a flawed concept when applied to loss in inner urban areas like Lane Cove. Here loss of any remnant of native vegetation is serious as there is so little left, and all remnants are precious as both historical records and in the provision of networked habitats and corridors. Historical records cannot be replicated by replacement planting, nor purchases elsewhere and the local wildlife (bats, possums, birds) have so little habitat that the loss of anything they use locally may bring on a tipping point for their viability.

Specific concerns

1. Need for an adequate Ecological Impact Assessment

Ecological or biodiversity impact has only been assessed for the development site itself. This is inadequate for sites located adjacent to bushland, particularly when they are upslope from that bushland. Even in regard only to the development site, details of the vegetation and slopes in the southwest corner are sketchy and poorly considered.

A full ecological impact assessment encompassing both the site's own bushland on the west and the reserve downslope should be required, as was required for the proposed development at 266 Longueville Road Lane Cove which also sits upslope of bushland.

In fact, all large developments adjacent to bushland, such as this one, should produce an Ecological Impact Statement in regard to that adjacent bushland, particularly where that bushland lies downslope of the development. Of particular concern are:

- impacts during construction,
- site stormwater management and impacts downslope

- the final building's ongoing over-shadowing and night light shedding into the bushland, which are both detrimental to vegetation, habitat and wildlife.

2. Scale of the Seniors Living blocks, including bushland and visual impacts

I agree with the Assessment Report (Section 6.2) that considers the Seniors Living blocks out of scale with the surrounding area and recommends modifying the building envelopes. The two seniors living blocks occupy so much of the developable site (i.e. excluding Pallister House and its curtilage) that they exclude further development of health-related uses on the site in future years as needs change and grow with increasing population. Taken just on GFA, the seniors living still comprises almost half (47.3%). The notion that these buildings could be converted to other health-related uses in the future (p.11 *Response to Submissions Report*) is fanciful given the prospect of dispossessing many elderly people from their units. Moreover, the internal structure of these buildings is unlikely to be suitably configured for other uses, and would require extensive modification.

It is not clear that the DPIE recommendations for building envelope and other modifications would prevent these buildings being visually obtrusive. They remain large buildings with extensive basement carparking, to be built close to bushland with these likely impacts:

- **Construction:** Potential surface demolition and construction impacts on the bush below (both the on-site bush and the reserve below) may be considerable, with soil and rock movement downslope. While some of these may be able to be addressed through careful building methods and tight monitoring and enforcement of protections and protocols, some damage is likely even if all this is in place (which is rare for building sites).
- **Long-term stormwater and drainage:** While plans to deal with the increase in impervious surfaces and consequent stormwater generation have been addressed, the **loss** of water to bushland slopes has not. Carving large basement carparks out of the higher ground may result in major disruption to water flow in the rock shelves and to the percolation of water downhill into the bush, potentially resulting in permanent drought conditions for that bush and its trees.
- **Other impacts:** Noise, particularly during construction, light shedding from the completed seniors apartments and increased shadowing downslope from the seniors blocks in spring and summer could all be predicted to impact on both vegetation and animals (The Assessment Report notes community and Council concern re overshadowing bushland, but does not address the shadowing of on-site bushland). The large mass of these buildings will also act as a substantial absorber and re-radiator of heat into the atmosphere and into bushland. In addition, all the hot air expelled by air conditioners on all the glass-walled units facing west will create an additional heat load on bushland at a time when climate change is already raising summertime temperatures.

2. Biodiversity loss

Loss of tress and bush remnants and the impact on habitat (for birds, bats, arboreal mammals etc) has not been adequately addressed anywhere, including the Assessment Report. As noted previously purchasing offsets for loss of habitat on this site is not adequate for areas such as Lane Cove.

Under the current proposal 86 trees are to be removed. This is a significant improvement on the 131 trees to be removed under the original proposal, but it will still result in immediate habitat impact. Staging the development and attendant tree removal is critical so that trees are not lost all at once. Replacement with advanced specimens with excellent post-planting care is also important to ensure habitat is replaced as soon as possible.

Of the trees to be removed in the current proposal, 10 are significant local tree species: 6 x *Euc. Pilularis* (blackbutt), 1 x *Euc. saligna*, 2 x *Angophora costata* and 1 x *A. bakeri*. Two of these (blackbutts) are rated as of high significance even by the Arborists report.

We are opposed to loss of native species, especially tree species of the original vegetation anywhere on site, and any stands of remnant bush which include at least some of the key habitat of mid- and/or ground story species. These represent important components of Lane Cove's history and heritage.

The three-storey respite facility will significantly impact the patch north of the access road, removing trees and almost cutting the patch into two even smaller fragments, particularly once paths and other exterior paving is added. This disrupts the connectivity of this corridor to the nearby bushland identified in the ecological report (Appendix N1). Of the 10 significant local trees lost with the second proposal, four (one each of Blackbutt, Bluegum (*E. saligna*), *A. costata*, and *A bakeri*), are for the respite facility.

Relocation of the respite facility to within the main hospital complex would avoid fragmentation of this bush patch and reduce the loss of indigenous trees.

3. Landscaping

Lane Cove LGA has a strongly leafy character, based on bushland and planting of locally indigenous species. Lane Cove Council has had landscape policies in place since the 1970s to foster this character with indigenous landscaping requirements for all medium/high density residential, commercial and industrial development. A primary aim of the current Lane Cove LEP (2009) 'to preserve and, where appropriate, improve the existing character, amenity and environmental quality of the land to which this plan applies'. This is currently laid out in DCP Part J Landscaping in which the first clause of the objectives is: *For medium/high density residential, commercial and industrial development, all substantial trees and that part of the landscaping scheme visible from the public domain shall comprise indigenous plants.*

In this proposal, for trees being removed the arborists report notes the work as 'Remove & replace with new plantings as per Landscape Plan'. However, there is no landscape plan at present. There is a 'Landscape Package' (Appendix L) which outlines the major landscaping zones and their key design principles but is 'broad brush' in nature. It does not describe, recommend or mandate indigenous planting, nor make any reference to Lane Cove Council's DCP Part J Landscaping. The summary of key changes, Table 1 in section 3.1, p.21 'Response to Submissions Report', indicates very little focus on indigenous species, being limited to retention around boundaries to 'soften edges and screen buildings'.

The assessment Report notes proposed use of 'native species' in landscaping – but this does not appear strongly in the development documentations. In addition, this should be *Lane Cove* native species.

The site has the potential to make a very valuable contribution to local bushland character and to provide an extension to the bushland habitat on-site and in the nearby reserve, as well as adding to wildlife corridor connectivity in the local area. This potential is ignored in the Landscape Package. Use of Lane Cove indigenous species should be part of the plans at this concept stage.

Conclusion

Despite some positive improvements and the DPIE recommended modifications, the current proposal still represents an overdevelopment of the site with residential, rather than health uses. The integrated seniors care model needs much better explanation and closer scrutiny, given the internal structure of these buildings is unlikely to be suitably configured for other uses, but even with this, the seniors living blocks are still too large for their proximity to bushland and their general context and are likely to have significant downslope impacts both during construction and after completion.

In terms of biodiversity, there is insufficient recognition of the function of trees on site as habitat, the impacts of removal of so many trees on local habitat availability, and the need for appropriate local indigenous landscaping. The respite facility should be relocated to within the main built complex so that the bush north of the access road, which provides historic context for the 'bridle path' can also be preserved.

Thank you for the opportunity to present a submission to the Commission.