

**Re: Objection to - Greenwich Hospital Redevelopment (Concept) Modification 1**  
**And**  
**Re: Objection to - Greenwich Hospital Redevelopment – Detailed Design**  
**SSD13610238**

**Preamble**

Please register my objections and concerns regarding both of the above proposals. This submission is to be considered a separate submission for both of the above exhibited items.

Please also respond with additional information or advise location of information where it is requested.

For both submission purposes, this submission contains main points and may be added to.

**Main Content**

Object to the intensification of use of the whole site which is unsuitable for such further intensification.

Object to the requested increase in GFA of the Seniors Living buildings by 11.4%

Object to the further enlargement of bulk and scale produced by terraces and balconies of the Seniors Living building;  
while not being included in the GFA these outdoor areas shown walled with planters and vegetation will have significant adverse impact.

Object to the 22 % increase in number of bedrooms in the Seniors Living buildings, from 150 bedrooms to a requested 183 bedrooms. Number of bedrooms should not be increased.

Object to the increase in number of apartments from 75 to 89.

If it is desired to have a greater diversity of apartment types by number of bedrooms, then depending on the mix, the number of apartments in total may reduce from 75. For example, 74 apartments can be provided with the following bedroom mix: 11x 1 bed, 50 x 2 bed, and 13 x 3 bed, which gives a total of 150 bedrooms, as currently approved.

Object to the requested increase in GFA of the Health & Care building by 9%.

Object to the increase in traffic and parking needs which will result from the requested expansion/intensification of use.

Object to the added road safety risk which be imposed on school children and carers with prams and toddlers, on both sides of River Road , due to the increased traffic volume at the signalised intersection from western internal access Road – a volume increased by not only the requested enlargement of the total facility, but also by the unsuitability of the site to the expanded use due to the traffic implications, and RMS left-in/left out rule at Main entry, which has necessitated the linking of the main entry traffic into the western access road via the underground parking area.

Object to the lack of proof for this statement p 15 in App. K – Traffic & Parking report:

*It is noted that the average people moving into the proposed housing will be 80 years.*

And request clarification or proof.

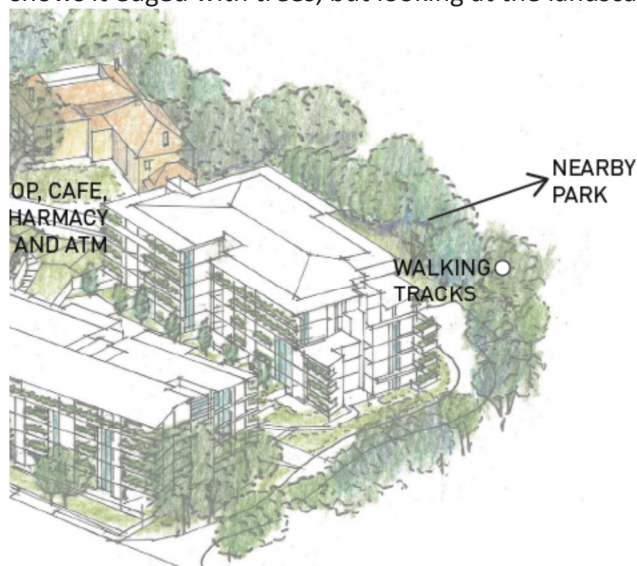
In another report it is stated that the average age of residents of the Seniors building will be 75 years – again, where is the proof of that?

But say, average age of **55 years** : Request comparison traffic and parking figures are prepared assuming persons moving into the proposed housing with an average age of 55 years – which is what the legislation permits, as well as permitting younger occupants to live with a person of 55 years or older.

Object to the adverse impacts created by intensification of use of the western access road such as increased traffic noise, increased vehicle lights shining onto residential and bushland during the dim hours.

Object to the above ground carpark for 12 cars in front of the southern seniors living. The road is elevated compared to existing lower carpark, the lights and noise will have a worse impact on Northwood across the valley and on nearby Greenwich residents.. The road is not screened by vegetation from the Northwood viewers, because the Hammondcare operators are ensuring they can maximise view and hence appeal to 'inmates' to maximises returns.

The following artists impression, p 31 of Urban Design report, misleads strongly about the access road – it shows it edged with trees, but looking at the landscaping plans, it is quite the opposite.



Object to the Southern Seniors Living not being re-oriented as suggested by DPIE in about 2020, which was insincerely investigated . The reorientation the building by rotating the eastern end of the long axis slightly to the north would have a significant benefit for many Northwood residents. It would create less of a side view of the building so open up more view of greened areas, and allow less blocking of the view of Pallister House from Northwood. The detriment to the landscaped court between the two buildings would be slight only, as it would still be a wedge shape, but just a be little narrower at the north end. The real estate agent's distorted photography was used to make out to the world that it make little difference – but the whole Visual impact report was a distortion – if you can't start with fair and honest photography methods, you won't get an honest investigation.

Object to the misleading or slapdash use of terminology relating to – for example, building heights, envelope and articulation zone, which are sometimes used interchangeably. This is both by the Applicant, and perhaps even by the DPIE and the IPC ( subject to review).

The Concept approval was for an envelope, it was not for a building height. Below is an extract of the approval:

- building envelopes, comprising:
  - main hospital building envelope with an integrated basement;
  - two seniors living building envelopes with an integrated basement; and
  - respite care building envelope;

Lift overruns, plant, solar panels, must be contained within the approved envelope.

Object to the introduction of a new term, “**development area**” used on the Concept drawings A, B and C legends. The way the term is used is very narrow, and also confuses with other words such as height, and envelope, and so on. The titles of the Appendix A, B and C Concept drawing packages add further to confuse, when some packages are called Building Envelope Plans, some are called Development Area Plans, and some are called Detailed Design Envelope Plans. The terms should be consistent and they should not be used interchangeably. The Concept approval is about envelopes, not about development areas. Once again, a sleight of hand at work so that statements can be made about what is in the “development areas” and what is not. It is not surprising that one of the statements made in the self –or-client-serving letter from LTS app. OO is this one:

*“As per the proposed site plans (provided by Bickerton Masters) no development will be taking place to the area of question”*

Clearly all through the process, the site has been the whole site, Lots 3 and 4 in DP584287, and includes the areas outside the envelopes, such as the bushland slope in south west corner.

Object to the misleading and disingenuous confusion created by for example, the use of the words **height** and **no higher than** and **no taller than** in the following extract, p19 of the Mod Report, when what is meant is the **envelope** because that was the approval.

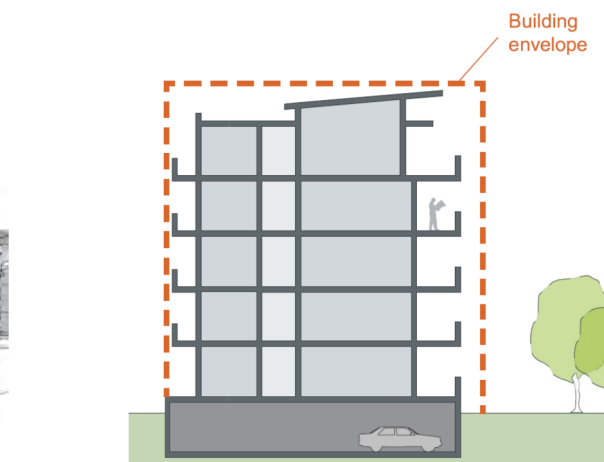
Building Envelopes  
and Urban Design

The proposed modifications do not affect the development’s consistency with the character of area considerations of the Seniors SEPP. Importantly, whilst the GFA will increase, no change is proposed to the height or scale of the seniors living buildings which will comply with the approved building envelopes (as modified by Condition A4). This achieves the key consideration of the Department / IPC’s assessment in that the northern building will be no higher than the existing development (equivalent to five storeys) and the southern building will be no taller than the height of Pallister.

Below are three extracts from the Apartment Design Guide, p29, Section 2B, on Building Envelopes



Figure 2B.1 Perspective of a proposed building design within the building envelope



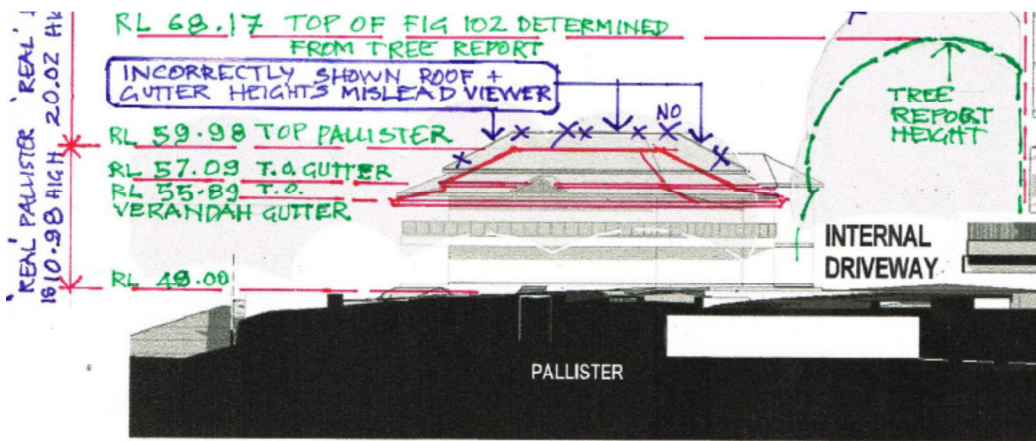
A building envelope should be 25-30% greater than the achievable floor area (see section 2D Floor space ratio) to allow for building components that do not count as floor space but contribute to building design and articulation such as balconies, lifts, stairs and open circulation space.

Note: Envelope should be 25 – 30 % greater

Above is from Apartment Design Guide, p29, Section 2B.

### Object to the misleading use of the wrong ridge height for Pallister House.

Pallister House is the slate roofed building built in 1892. Its maximum ridge line is **RL 59.98** . Attached is a markup submitted by this author previously, alerting to the exaggerated roof height shown for Pallister in the architectural drawings.



It seems now that a disingenuous course of action has been followed, wherein the Applicant and architect have adopted and depicted the wrong ridgeline to use as the maximum ENVELOPE height for the southern Seniors Living building, as shown in the misleading depiction in the drawing extract above and the disingenuous statement p19 of the Mod Report reproduced here for clarity,

p19 of the Mod Report

*"This achieves the key consideration of the Department / IPC's assessment in that the northern building will be no higher than the existing development (equivalent to five storeys) and the southern building will be no taller than the height of Pallister."*

It is very disappointing that despite being alerted to the exaggerated roof height shown for Pallister in my architectural drawings markup previously (see above) no notice has been taken by Hammondcare or their architects, or the DPIT, as the misleading is continuing in this exhibition.

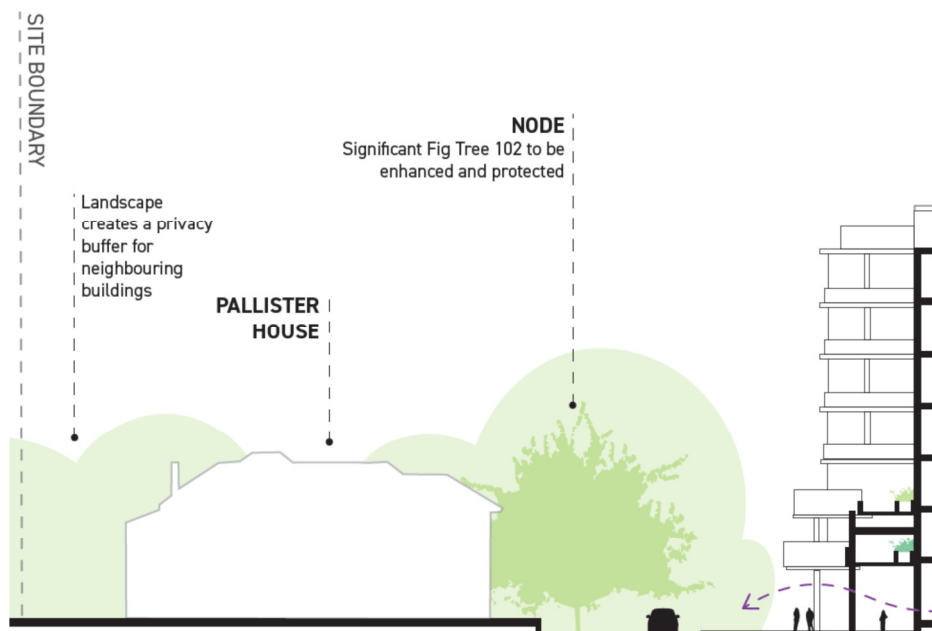
The page shows a drawing of how the roof line of Pallister has a sunken middle :



App. B – Urban Design Report , p22

- if it is shown p22 correctly, why is it wrong on page 23?

The below extract is from App. B – Urban Design Report , p23, yet again shows a weird and incorrect roofline drawn for Pallister House. The roof is not as high, nor the shape shown, below, nor Fig 102 is not as high.



App. B – Urban Design Report , p23

**The maximum envelope height for the southern Seniors Building is required by consent conditions to be RL 59.98 because that is the height of the ridge of Pallister House. It is not and never was RL 60.65.**

Following are extracts from the earlier Concept application App. H – Heritage Impact statement which proved that Pallister House is the building constructed with a slate roof and internal skylight, in 1892.

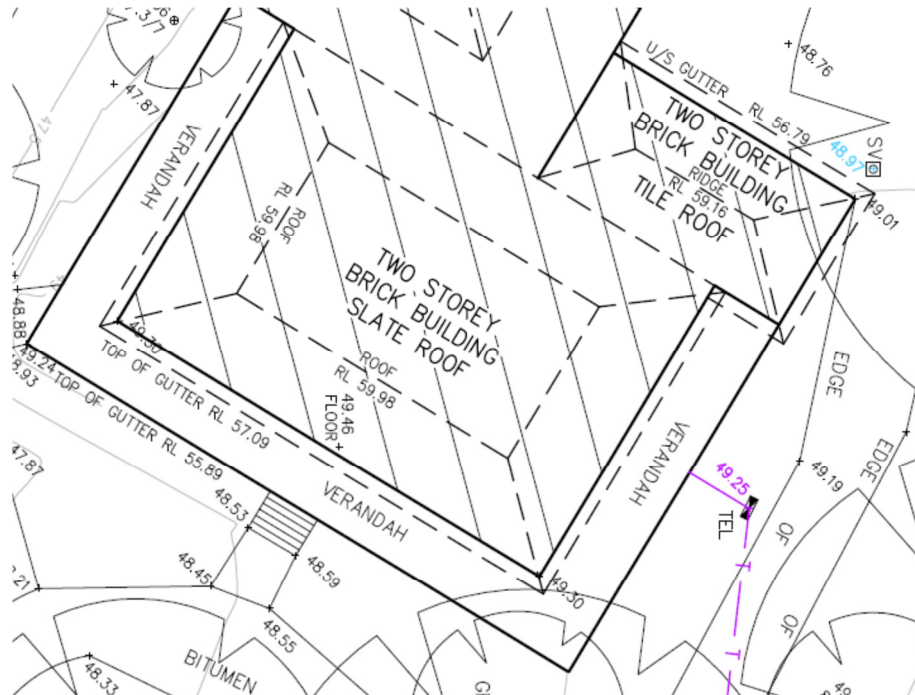
### 2.3 HISTORY OF STANDISH (NOW PALLISTER)

The following history of Standish, now Pallister, is reproduced in full from the NSW Heritage Inventory Listing.<sup>1</sup>

*Originally named Standish, the villa was constructed in 1892 for John St Vincent Welch. Welch, born in Devonshire England in 1847, moved to Australia in 1876. He is alleged to have designed Standish himself, although the unusual features of the house, such as the stair hall and roof light, suggest an architect's involvement. Many materials are believed to have been selected during his family's visit to England including the mahogany for the grand stair, the Bangor roof slates, the marble fireplace in the drawing room, plus various pieces of furniture and paintings.*







Portion of earlier Survey E p5 which shows rectangular ridgeline shape of Pallister, at RL 59.98

Object to some misleading statements in the App LL Social Impact report, such as this one which is disguised as a benefit:

“

A Stormwater Management Plan has been prepared with the EIS and new works will ensure no drainage impacts to the existing overland flow.

Ethos Urban | 2190376

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“

It is scant comfort to be told that *“new works will ensure no drainage impacts to the existing overland flow”* which is the same as saying, **the existing overland flow will remain the same**, when the existing overland flow is already excessive, poorly controlled and results in repeated inundation of land and buildings on properties to the south and west, as well as repeated inundation of the bushland to the south and west, including both Hammondcare land and Gore Creek Reserve, with associated weed dispersal.

Incomplete Arborist Report : Object that Hammondcare have not produced a tree survey of the of the south-west bushland slope ON THEIR LAND which adjoins the Gore Creek Reserve. It is essential to have the trees positioned on the full area of the bushland south western area. Without this information, it is not possible to know the content of the bushland, monitor impact of the development on

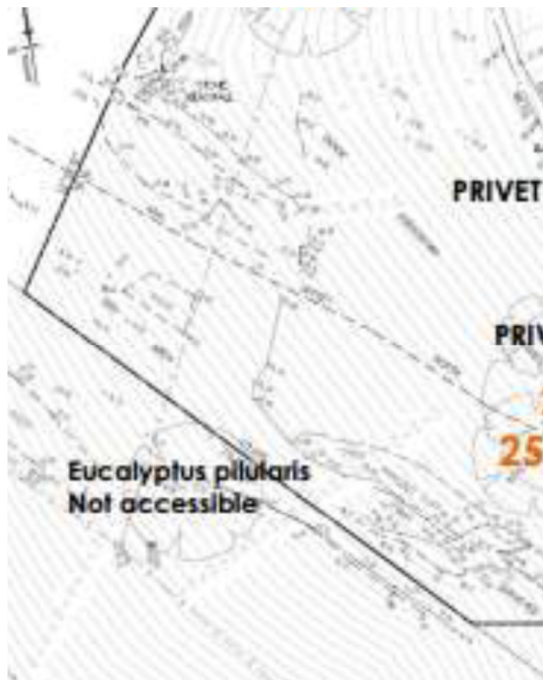
A Biodiversity Report of the Gore Creek Reserve adjoining Hammondcare land must be produced (this was done for other developments adjoining bushland such as behind 266 Longueville Rd).

Bushland on south-west slope of Hammondcare has been repeatedly ignored by Hammondcare despite their initially showing landscaper’s drawings of paths meandering down the same slope, and making statements about how they will respect the landscape setting of the site and rehabilitate it.

App. I, by Travers, Biodiversity Development report has done some work there but it is inadequate because it identifies only for eg what % of canopy cover there is in certain quadrats, but does not state how many of each species were found in that quadrat – nor, for that matter, on the whole slope.

Survey ignores it and has produced a disingenuous letter about it. Problem is it again ignores the bushland corner.

*R Tree Impact Assessment Report*, again ignores the bushland slope in the south-west corner. Location of trees on bushland slope in the report are essential for identifying assets and for monitoring the environment. It incorrectly states that for example, that certain features are not accessible.



Extract from *R Tree Impact Assessment Report* p445



Photograph of the *Eucalyptus pilularis*, which is actually accessible although not by wheelchair or pram. The green vertical sewer vent can be seen to the left.

Site boundary with bushland has not been surveyed nor delineated. Hammondcare need to know where the edge of their site is, as do LCC,. This should be essential.

The Lighting Statement is totally inadequate. It is known from the content of the lighting report done for adjoining Bob Campbell Oval, that AS/NZS 4282:2019 - Outdoor Lighting Obtrusive Effects is totally inadequate for assessing light spill in bushland and on fauna..

Impose a condition that Light Spill in Bushland and onto fauna must be assessed and shown prior to any approval.

Impose a condition that LCC's Light Spill standard, now in preparation, must be complied with retrospectively. Refer to the study by Threfall et al. on impact of urban light on microbats – one of the study areas was in Gore Creek valley.

Dementia and aging in place is being used as justification for the increase in bulk and size of both Seniors Living and Health & Care buildings, yet the Seniors Living has no dementia suitable SOUs in it. (dementia needs to be isolated within secure controlled access and surrounded by 1.5 m high railings/fences to prevent escape).

Request information on which levels and which building and which wards will have dementia patients.

Request a revised perspective of the Health and Care building from River Rd, and other directions. Visual impact of enlarged Health and Care building - has it been assessed? Where is it?

Request a total area of all balconies included on each building, level by level.

There is nothing to stop HammondCare subdividing their property after completion of the Seniors blocks, and selling off the buildings as a whole. The management plan is that Seniors will be occupied on a license basis, so there is no lease to break, and tax-free profit can be made if the apartment blocks are sold off.

Is this "substantially the same development" ? given that Hammondcare appear to be saying there can be dementia patients everywhere , and hospital rooms everywhere (ie, in both Seniors building, in Health & Care building, and Respite building) - it is now a different development. Units will apparently be built to Class 9C standards to 'permit flexibility for their usage to be changed from "owner/lessee occupancy", the usage which is approved for them, to traditional aged care or hospital related uses as required. These uses are not approved in the current approved concept . I object strongly to the applicant being given approval to willy-nilly change the usage of seniors living occupancies to that of a hospital use, without having to go through a planning and assessment process. The continuum of care model is a clever marketing jingle.

Hospital – convertible rooms being optioned everywhere means that hospital will be in the Seniors building or wherever they choose. How can an assessment be made on such vague terms?  
For example, there will be more difficult patient evacuation in event of bushfire or facility fire – where is this assessment please?

The Surveyors letter App. OO is self-serving and disingenuous, stating in part:

*3. The area is steep and heavily overgrown with weed, includes considerable embankments and represents a high risk environment to those completing any surveying works;*

This could not be true because Travis Ecology have done flora and fauna survey work in this bushland slope, see page 14, item 2.2 of App. I Biodiversity Report which states:

*" Flora survey was undertaken on 18 October 2021 and 8 Feb 2022 for a combined time of 8 hours"*

Surveyors have surveyed an adjoining steep bushland slope on 24 Gore St, and somehow managed. Likewise, large areas of steep and densely vegetated Gore Creek valley further upstream, have been surveyed. Travers BDAR has been in the area, and worked. Surveyors have been there and have actually



surveyed it, as will be shown. The survey layer used in the underlay to App. I2 Civil Engineering Plan is exactly the same as the App. E Survey (2019 exhibition) by LTS - with one exception - the south-west bushland slope has been omitted from the App. E Survey and replaced with an alternate reality version - even though it shows up in App. I2 Civil Engineering Plan. The correct contours have been known since 2009.

LTS Surveyor Letter App. OO states goes on to claim that the bushland slope can only be surveyed if “*the existing vegetation would require poisoning and removal with the use of a crane to allow for an environment that is both safe and has the ability to obtain the relevant survey details*”

The letter notes that Hammondcare have started vegetation management plan, an admission that the Concept approval conditions have been breached,.

Sadly the surveyor knows little of bushcare management techniques. Also, it is quite surprising that the surveyor somehow knows (which he doesn't) what is on the bushland slope, without ever having been there!!!

*5. Any removal of vegetation may increase bank instability and would require HammondCare to expedite their current vegetation management plan to which they were undertaking over an extended period to allow for adequate growth between plantings.*

This is generally not true because in App. H - Vegetation Management, by Travis Ecology, the major portion of the bushland slope is not designated for any vegetation management - note that only cross-hatched areas on the higher parts of the bushland slope are designated for restoration. These restoration areas make up by far the lesser part of the bushland slope, on App. H Map (pdf page 7).

The justification for the proposal is not sufficient. If making building corridors wider for “future proofing” makes the building envelope and GFA bigger, obviously the accommodated functions must reduce.

Mod Report, P 9, s 4.2 – what is justification for this?? :

*“as well as requirements for smaller households with direct access to external terraces.”*

And this: p10 s 4.3 –

*“It is also noted that the GFA proposed is a result of securing the financial sustainability of the health care campus”*

If Hammondcare, receiving about 70% of its revenue from government funds,(from taxpayers), can't afford to build all this, then don't build it. Make it smaller and it will cost less.

Request where to find a table setting out responses to all the SEARS as issued on 24 February 2021 for the SSD.

Some may be in traffic report, some in the other reports.

For example, where to find the response to this SEARS conditions? :-

likely interactions between the development and existing, approved and proposed operations in the vicinity of the site.

Urban Design Report – page 5 – refers to a Report section 5.7.

There is no section 5.7 in this report. Please provide it.

The assessment in the Social Report looks only at impact on those within the facility. It does not consider the impact on residents and others.

The visual impact report uses photos from a real estate agent "V-Mark Design Real Estate Photography and Floor Plans" with a fisheye lens and are misleading. It uses "distorted" lens photography typical of a real estate photographer. What is the focal length used? A human eye's cone of vision" is represented better at about a 55 mm lens. See in the "fisheye" Photo at 17 Upper Cliff Rd, Northwood - all the red roof houses on street opposite are in a straight line but appear to be on a sharp curve. This kind of very wide angle lens downplays the impact of the item (new seniors blgs and Hospital ) in the middle distance.

Noise monitors have been placed in inadequate number of locations. As before, the noise monitors (map, p9 of Noise assessment) are located at edges, down banks, where they are not receiving the worst that their overnight noises make. Extremely loud noises are generated at night ( usually 3.27 am) when Hammondcare has the big bins emptied. many residents complain of this.

Consultation woefully inadequate, and misrepresented in the reports. No detail drawings were shown. Questions asked in the zoom meetings were not responded to, and questions posted in the Chat windows during the meeting were still visible, awaiting a response, when one of the meetings closed 15 minutes early.

Erosion control inadequate. Severe damage has been caused to bushland where erosion controls failed.

Bushfire assessment from RFS is missing ( PBP has been updated since original application, also maybe land designations)

Water table will be affected by further lowering of water table due to more car parking ( check this)

Population projections do not take into account the recent downgrading of the population growth anticipated.

Request to know the location of Nurses stations on most lower levels – one can find very large dining and lounges.

There are solar panels on the roofs of both Seniors blgs, and Health & Care add to the bulk/height but not shown clearly if they fit within the building envelope, which they should - and which needs reducing .

Pets. What will be the situation with pets, given the sensitive nature of the site adjacent to a wildlife corridor?

What will be the situation with residents feeding birds on their private balconies? There is abundant bird life here but feeding the birds is undesirable but how will it be prevented?

Weeds risk spreading from planters along terraces and balconies – the image here is from Urban Design report –



The dripping foliage if it is invasive or weedy, will spread to bushland. Incomplete Vegetation Management Plan. Only a small portion of the bushland slope is shown hatched, see map p7 -

Hammondcare have started work on the Concept project in contravention of the consent conditions. They have begun vegetation programs while they have refused to provide requested information on what is actually

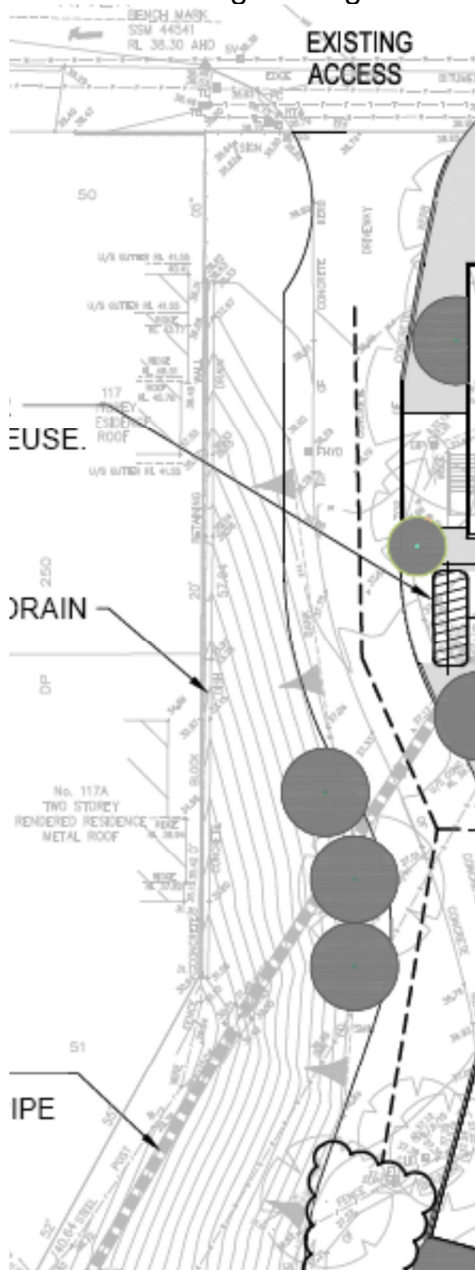
on the site. A disingenuous justification is given, that it is not part of the 'development' site, and that they are responding to a Weed notification letter issued by Lane Cove Council's weed officer, in August 2020. This letter was sent as part of Lane Cove Council's inspection program of private properties adjacent to bushland assets, one such being the Gore Creek Reserve bushland, where private property adjoined it, such as the lower part of the bushland slope on Hammondcare land.. It requested removal of weeds which were at risk of re-invading the bushland areas, specifically including tobacco bush, madeira vine, morning glory vine, and privets.

### Underlying Survey layer in Civil Engineering Plan is the same as Survey by LTS

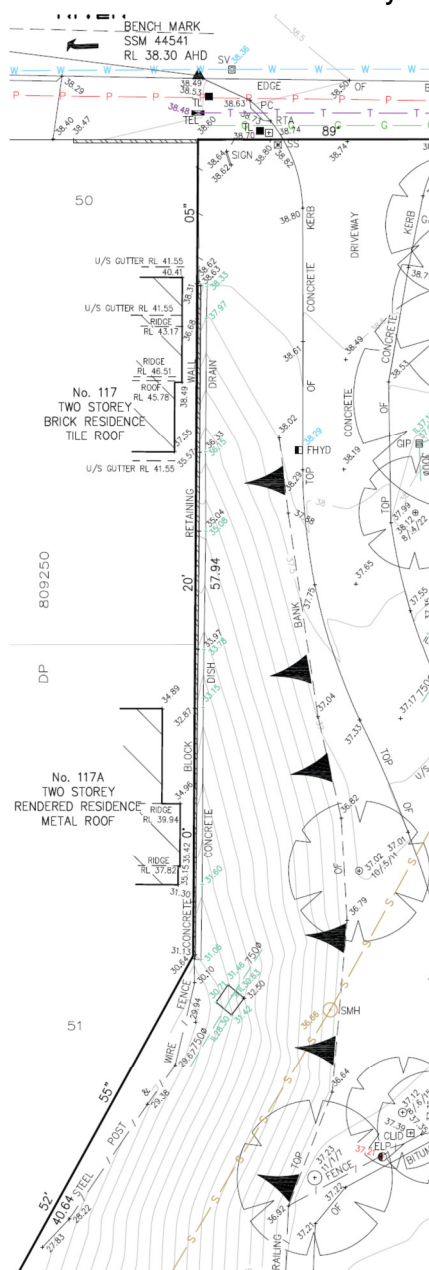
This can be shown by comparing extracted portions from both plans.

The **exception** is that portion of S-w Bushland slope in Survey is not the same as shown in Civil Eng. Plan

Date of Civil Engineering Plan 23/2/2018



Date of LTS Survey 4/2/2009



Left: App I 2 Civil Eng. Plan extract western boundary Right: Appendix E Survey – Page 2 - extract of same portion . Note that Civil Eng. Diagrams overlaid have obscured some of survey linework but it is the same. Clearly, the underlying Survey layer is the same in each extract above.

The same can be seen elsewhere on the Survey from LTS dated 4/2/2009 (more examples exist)

Yours sincerely,  
A Northwood Resident.