

Greenwich Hospital Redevelopment– Detailed Design (SSD-13619238)

Submission

As part of a group of residents of Lane Cove concerned about the bushland on, and adjacent to this site, I made submissions to the various stages of the concept plans for this hospital site.

Given my interest in, and concerns about, the bushland, this submission focuses largely on that aspect, particularly the bushland in the southwest corner of the site and adjacent to this in Gore Creek Reserve,

I wish to examine four aspects of the plans in detail in regard to this bushland:

- site assessment and planning
- slope protection
- regeneration and restoration
- light spillage into bushland

However, before I do, I would like to reiterate some general concerns with this proposal:

- The large proportion of the site taken up by non-hospital uses (seniors living), sterilising it for future hospital uses expansion.
- The scale of the buildings, particularly Seniors Living South close to the bushland slope, intruding on views from surrounding areas and impacting the bush below, particularly light spillage.
- The extent of native tree removal (even after the modifications to the original concept plans). This becomes particularly concerning with the impacts of developing and maintaining an APZ through all the bush in the eastern part of the site, resulting in substantial impacts on that bush. The extent of the APZ is baffling where the bush is adjacent to roads and houses and it is difficult to see where a fire could originate to threaten this area.

Bushland in the Southwest of the Site

There are two categories of bushland I refer to here:

- Southwest corner of the proponent's site which contains remnant bushland on the upper section of a bushland slope (SW corner bushland)
- Bushland downslope of the area above which is C2 zoned protected bushland, part of Gore Creek Reserve ('Reserve bushland')

Site assessment and planning

Need for more appropriate assessment of existing vegetation and potential biodiversity impacts:

The SW corner bushland

This area has been inconsistently assessed and there is inadequate description of what exists here. Neither the 2018 Redgum Arborist Report, nor the Mark Bury Consulting Tree Impact Assessment Report (Appendix R) map and name the trees present in this area – surely a fundamental requirement of an Arborist report. The letter at Appendix OO claiming it is too difficult to get into this area is nonsense as the Travers Biodiversity Assessment Report (BDAR) clearly shows their flora survey track right through this area (Figure 3.2, p35). Likewise, the simplistic description of the area as 'existing dense vegetation' with no further detail on the Bury Report map on p448, or a broad labelling of areas as PRIVET on map p445 is completely inadequate. The labelling of a tree just outside their boundary as 'Eucalyptus pilularis Not accessible' (map p445) as local residents have been easily able to access this tree.

The Travers BDAR does a much better job of providing a picture of the vegetation in this area but it does not actually locate the species identified for Plot 2 in Table 3.1 (pp22-23) as it is providing a broader vegetation community assessment. ***It is obviously possible to identify the trees in this zone and this should be done prior to any works in this area, to ensure their retention can be monitored.***

The statement in third par section 7.6, p93 that all trees on site have been assessed and appear in the schedule, with the condition, dimensions, structure, and health of each, is thus apparently incorrect.

The reserve bushland downslope

This development, specifically the Seniors Living South block sits above a bushland reserve with potential for significant impacts both during construction and afterwards. There does not appear to be any biodiversity assessment of the adjacent bushland, given the extent to which the onsite bushland adjoins and relates to it and the building works could impact upon it. It is all part of the one habitat and the same vegetation communities. ***Site ecological assessment should include adjacent bushland***, as was required by the SNPP for a similar scale development planned at 266 Longueville Road, Lane Cove.

It should also be noted that while the EIS covers many topics and impacts, it does not include sufficient assessment of impacts/potential impacts on bushland (Including the adjacent reserve) as a whole. This is inadequate, given the bushland in both east and west parts of the site, and adjacent.

Slope protection

In recent years, Lane Cove has experienced major impacts on bushland, including a Threatened Ecological Community, from uncontrolled sediment flows off two large developments on steep sites above bushland. It is critical that Erosion and Sediment Control Plans are clearly specified in DA documents, and for development above bushland on steep slopes these plans must upgrade the controls to a minimum of two high steel fences, approx. two metres apart lined with silt fabric to a height of one metre. Photo 1 in the appendix to this submission shows the inadequacy of regular sediment controls on one of the recent Lane Cove development sites. Photo 2 shows single steel fencing put in place after the inadequate original controls were overwhelmed and sediment spread through the bush on a wide front below the site. However, the original inadequate fencing still forms the second layer and should be replaced with the higher and stronger steel version. This double fencing should be mandatory on such steep sites and it must be in place on such sites before disaster strikes.

In these DA documents:

- The VMP specifies erosion control fencing/sediment fencing protection for the bushland under both 'aims' and 'site preparation,' but provides no specifications.
- In the EIS, there is no mention of bushland protection, while an Erosion and Sediment Control Plan (ESCP) is mentioned under 'Stormwater and Flooding' but only referenced to the *Stormwater Management Report*.
- The BDAR, section 6.2 (b) notes as a mitigation measure *Sediment and erosion control measures in accordance with Managing Urban Stormwater: Soils and Construction (Landcom 2004) to minimise impact of possible sedimentation to local drainage lines*. However, this document does not appear to include measures for sites directly comparable to high density development on steep slopes above bushland in inner urban areas, such as we have in Lane Cove.
- The *Construction Management Plan* mentions an ESCP on p.27 and at 4.4.6.9, p31 but these only pertain to drain protection and truck washing.
- The *Stormwater Management Plan* shows details for Erosion and Sediment Control for Stage 3 in a plan on p.18. this includes a perimeter sediment control fence for the entire Stage 3 works, accompanied by a drawing with some details of this fence. While specifications indicate a stronger fence than the sediment fencing in Appendix Photo 1, as a single fence apparently less than a metre high, it would not be enough to hold the sediment flows we have seen from the site in Photos 1 and 2. ***The fencing should be higher and the controls strengthened to a double fence across the bushland slope portion of the perimeter.***

This is particularly important, given the *Construction Management Plan* shows the area immediately adjacent inside the works area of Stage 3 to be a truck marshalling area and a lot of truck movements will be occurring here through the project.

There two further concerns regarding sediment:

- The *Stormwater Management Plan* shows a potential sediment basin in the area adjacent to the bushland slope. This has potential for overflows causing damage for bushland. If there is to be such a basin in this area, mitigation measures to prevent overflow must be clearly stated.
- Stockpiling of topsoil is a potential threat to downslope areas unless it is carefully contained. Simple siting out of drainage lines (SMP Erosion and Sediment Notes) is not sufficient under the weather conditions experienced this year in Sydney. Provisions to ensure containment should be specified.

Regeneration and Restoration

The Travers *Vegetation Management Plan* is not clear in its coverage of the entire bushland corner. Apart from replanting and restoration clearly shown by crosshatching on Schedule 1, the important weeding and regeneration which needs to be part of this project in the remainder of the PICT 1841 (green) and PICT 1828 (yellow) areas on Schedule 1, may be covered under the VMP aims but it is not clear and not shown on Schedule 1 or otherwise mapped in this document. Any approval should ensure that regeneration of all remnant bushland of the site to high quality bushland is a key component of the work.

Post-construction Impacts

Light spillage into bushland

Light at night presents a significant disturbance to wildlife. No measures articulated to prevent or minimise light spillage into bushland have been found for this development. The Lighting Statement (document II) addresses only a standard for lighting obtrusive to people. While there are no Australian Standards for lighting adjacent to bushland, there are the Australian Government *National Light Pollution Guidelines for Wildlife* (January 2020) found here:

<https://www.agriculture.gov.au/sites/default/files/documents/national-light-pollution-guidelines-wildlife.pdf>.

For Greenwich Hospital, the documents relating to biodiversity and environmental impact do not consider this issue, yet the development includes a large building with significant areas of glass windows overlooking bushland, as well as outdoor areas, roads and paths near, or on the edge of bushland. ***Minimising light spillage into the bushland must be addressed at this design stage.***

In summary, there a range of aspects in which the planning for this development could improve in its documentation, treatment and protection of bushland, a scarce and very valuable resource in inner urban areas such as Greenwich.

Appendix 1



Photo1: Steep slope of unconsolidated excavated rock and sediment with a totally inadequate low silt fence on the edge of bushland reserve



Photo 2: A single layer fabric-lined steel fence can also be breached in extreme weather. A second layer is required to act as a failsafe. For either fence on a steep slope the traditional low green fencing is totally inadequate.