
The Northwood Action Group Inc

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President: Margaret Curley

Secretary: Stephen Curley

Subject: Objection to Redevelopment of Greenwich Hospital (Concept) Modification (SSD-8699-Mod-1)

The Northwood Action Group Inc (aka NAG) is an active community group that delivers its newsletters to some 300 households in Northwood. NAG wishes to respond to the Environmental Impact Statement and other material lodged with the Department of Planning and Environment by HammondCare in relation to Detailed Design SSD 13619238 and Section 4.55(1A) Modification Application Concept Plan SSD 8699. Our objections for both SSD 13619238 and SSD 8699 are common and each objection lodged is identical as both development applications only relate to the Greenwich Hospital Development.

NAG had previously lodged an objection to Redevelopment of Greenwich Hospital SSD 17-8699 in March 2019 and further background to our objections is detailed in our March 2019 objection. Our objections numbered 3. to 8. below are similar to our objection lodged in March 2019 but have been revised to provide our current view in relation to the current modified proposal.

Our objections to SSD 13619238 and the current SSD 8699 are as follows:

1. This development should be separated into two distinct developments. Its predominately a multi-dwelling high rise housing development and a separate upgraded Hospital and ancillary care, not **only** a Hospital with ancillary Health Care Facilities. We ask that the approving authority reconsider the position that was previously taken in that this whole development was deemed an integrated health campus and separate this development into two parts.

Over 45% of the proposed FSR has been allocated to private apartment development. The very size of the private apartment component of this development clearly shows that there are two separate developments, and we ask the approving authority to treat this as is it clearly is:

- a. A new Hospital with associated services such as dementia care and respite services.
- b. Two senior living apartment towers

The purpose and use of the Hospital and the related Health facilities are clearly distinct from Seniors Living apartments. Further, the modifications proposed to the approved concept plan make the two senior living towers even further removed from being ancillary to the new Hospital. The adding of 15 three bedroom apartments shows clearly that the apartment towers are designed for long term residential use.

The convenient ploy of linking the car parking facilities for the two developments doesn't make it an integrated campus. 'Hospital in the Home or 'Age in place' is able to be

provided in any independent residential development. Simply co-existing adjacent to a hospital does not change its nature.

One other argument raised by the proponent is that the funding for the hospital can be undertaken at least in part because of the funding generated by the residential towers. This funding rationale is not an argument to link the two developments as an integrated campus.

2. The proposed modifications increase the number of bedrooms by 22% from what has been approved in the Concept Plan. This intensification of use should not be allowed by the approving authority.

The modifications proposed are a blatant push to over-ride the approving authority requirement to lessen the bulk and scale that it approved previously. The arguments from the proponent that this is an immaterial change should be rejected. A 22% increase in the number of bedrooms is a major change to the proposal and should lead the approving authority to review the entire proposal as well as its prior approval. Further the introduction of fifteen 3 bedroom apartments change the nature of the apartment towers and the bulk and scale should be scaled back.

3. Permanent loss of land zoned SP2 infrastructure, for Health Services Facilities

This land has special purpose zoning benefits by virtue of its zoning use. Once this land zoning is over-ridden/ignored and used for privately occupied residential apartments, whether under a loan license agreement or other title type, or within any further subdivision, the land is permanently unavailable for the purpose for which is intended, i.e. Health Services Facilities. We also wonder whether one of the reasons HammondCare is going to use a licence model for the Senior Living Apartments is that this facilitates the saleability of an entire apartment building. The recent sale of the 99 year lease of 266 Longueville Road by Australian Unity to a developer could be a precedent. The modifications proposed to the approved concept plan further strengthen the argument that this will be a loss of land zoned for Health Services as the residential apartments are clearly for long term residential use akin to the surrounding area and not used for SP2 purposes.

4. Character of Multi-dwellings is inconsistent with LEP and desired character and feel of all surrounding residential zones R2

The Lane Cove LEP prohibits multi-dwelling housing in R2 Low Density Residential Zone. The entire area around the hospital site is zoned R2 and consist of low density residential properties. Not only is high rise residential development contrary to all the properties around this site, the skyline from Bob Campbell Oval and Gore Creek reserve will be dominated by these two residential towers.

5. Environmental Damage to E2 zoned bushland Reserve and waterways and community assets including Bob Campbell Oval is threatened by the two high rise senior living towers and associated underground works and access roads on the edge of this E2 land. This is exacerbated because of the intense slope from the site though the bushland reserve.

The Gore Creek Reserve adjacent to the Greenwich Hospital site is a key access corridor for native animals and birds to access the greater Lane Cove National Park. The Gore Creek Reserve provides direct access for animals and birds to connect from the Lane Cove National Park to the Harbour. A good example is the pair of breeding

goshawks and their offspring that are currently nesting in the reserve. These beautiful animals have frequented the reserve over the last few years and continue to raise their young in the warmer months. These birds featured in the Lane Cove Bushland publication 'The Golden Whistler'. These hawks are in addition to the more traditional bushland inhabitants such as powerful owls and tawny frogmouths that use the reserve as their wildlife corridor.

There appears to be no detailed environmental plan to rehabilitate bushland in the South Western portion of the site. It is stated that the area is weed infested and too difficult to survey. Refer to the letter from LTS Registered Surveyors. The proposal appears to be misleading in their bushland management, because there doesn't appear to be any bushland management plan. How is the duty of care during construction and future management of the bushland corridor adjoining the site being managed? There is a lack of information as to how this bushland corridor will be preserved.

It is also stated in the Environmental Impact Statement, that 'Vegetation Removal and Protection' (p13), that the design will be integrated into the landscape. What is planned apart from around the hospital site itself? Surely if this development sits on the edge of a bushland corridor then it sits within the bushland landscape. There is clear duty of care to work with council staff and bushcare groups to maintain and protect this area for the future. We ask that a biodiversity study on the reserve be carried out and an arborist report on existing trees on the South Western slope that adjoins the Gore Creek wildlife corridor.

We would also like to know what provisions will be put in place to protect the bushland corridor during site preparation works, demolition of existing buildings and construction. Given the damage to bushland behind the Pathways development site at 4 Northwood Road the community is very concerned about what safeguards have been put in place to protect the Gore Creek wildlife corridor. We see a lot of words but little detail.

The Gore Creek Reserve is of immense value for Lane Cove particularly with as a buffer against continuing further development in the area. We must preserve the existing bushland and its flora and fauna and not allow development along its border as envisaged by the hire-rise residential towers in the Greenwich Senior Living proposal.

6. Negative impact of Loss of Trees on and off the site compounding effect of Reserve tree death

Many mature trees are planned to be removed from the site. Although the proponents are planning to replace these trees, it is impossible to replace a mature canopy of trees. Any loss of mature trees impacts the core bushland corridor that currently exist on the western and southern boundary of the site and in the bushland zone E2 land which fills the area between the hospital site and Bob Campbell Oval. Currently the proposal notes that 85 trees will be removed from the site. The removal of these trees will be a loss that will take a generation to recover and worsen the visual and noise impact from the site.

7. Bushfire Prone land: danger to persons, subject site, nearby sites, public assets and infrastructure

The south-western Seniors block is on bushfire prone land and the proposal states that the proposal is 'capable of compliance with the relevant bushfire requirements'. This proposal should not be approved where a development is only 'capable of compliance'. It should be a requirement that a detailed fire assessment is conducted on bushfire prone land prior to any approval of a detailed design proposal. It is illogical to finalise the detailed design plans and then complete the bushfire assessment. We ask that the approving authority require the bushfire assessment be completed before it finalises the assessment of this DA.

8. Adverse impact on Traffic and local road network due to site intensification and the accumulated impact because of other high rise developments along River Road/Northwood Road.

The adverse impact of traffic on the area because of the modifications to the proposal and the accumulated impact of other high rise developments have not been considered in its entirety. The traffic assessment should be conducted to understand the cumulative effect of St Leonards South, 266 Longueville Road, 4 Northwood Road, Sports and Recreation Precinct which all have significant impact on River Road. Prior to any approval of this modification a new traffic assessment should be required.

9. Consultation effectiveness and claims

The EIS has stated that substantial engagement with the local community was carried out. This engagement has been hit and miss. For example the claim that briefings were offered to Northwood Action Group is wrong. No offer was made.

The effectiveness of the communication is also questionable. The authors attended one of the online information sessions in March 2022 and were no wiser after the event. It was purely a marketing presentation and a number of the questions raised by participants were not answered. Although this was partly caused by the cumbersome process because of COVID requirements to have it online, its effectiveness was doubtful. For example the session was terminated 15 minutes before scheduled ending at a time when there had been a number of questions submitted that were not answered.

NAG wrote to HammondCare last week with a number of questions relating to the material supplied to the Department of Planning and Environment. At the date of submission of this objection these questions were still to be answered.

Conclusion

We ask that the approving authority review the decision made for the concept approval to regard this as one development of an integrated health campus and look at the development as two distinct developments. The arguments raised initially with the Concept Plan were at best marketing arguments and not driven by the core purpose of the two developments. This is now more clearly shown by the proposed modifications to the residential towers and inclusion of 15 three bedroom apartments is well and truly removed from an integrated health campus.