



# Greenwich Community Association Inc

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For current committee contact details see [www.greenwich.org.au](http://www.greenwich.org.au)

17 December 2019

Ms Megan Fu  
Contact Planner  
NSW Department of Planning, Industry and Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Ms Fu

## **State Significant Development SSD 8699 Redevelopment of Greenwich Hospital (Concept)**

### **Status of Greenwich Community Association Inc**

The Greenwich Community Association (GCA) is a non-profit incorporated community association dedicated to gathering and promoting the views and interests of the residents of Greenwich. It was established over 70 years ago and has extensive experience in the planning issues affecting the community – see our website: <http://www.greenwich.org.au/>

The GCA acknowledges the need for quality health services for the aged and infirm community.

Notwithstanding this need, the GCA objects to the proposal on the grounds outlined below.

### **Grounds of objection**

#### **1. The proposal does not meet the requirements for assessment as a State Significant Development**

Section 8(1) of State Environmental Planning Policy (State and Regional Development) 2011 outlines the requirements for a proposal to be assessed as a State Significant Development:-

*(a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and*

(b) *the development is specified in Schedule 1 or 2.*

**1.1 *the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act***

The subject site is zoned SP2 – Health Services Facility in the Lane Cove Council Local Environmental Plan 2009.

A “health services facility” is defined as follows:-

*health services facility* means a building or place used to provide medical or other services relating to the maintenance or improvement of the health, or the restoration to health, of persons or the prevention of disease in or treatment of injury to persons, and includes any of the following:

- (a) a medical centre,
- (b) community health service facilities,
- (c) health consulting rooms,
- (d) patient transport facilities, including helipads and ambulance facilities,
- (e) hospital.

The residential apartments/villas contemplated in the proposal do not fall within any of the uses listed above.

Furthermore, the apartments /villas are not “incidental or ancillary” to development of a health services facility in terms of the uses permitted with consent under the Zone SP2 Infrastructure provisions.

**The proposed residential apartments/ villas are not a permitted use with or without consent under the provisions of the Lane Cove Local Environmental Plan 2009. The proposed use is, therefore, a prohibited use in terms of the relevant environmental planning instrument.**

**1.2 *the development is specified in Schedule 1 or 2***

Only part of the proposal falls within Clause 14 of Schedule 1 - Hospitals, medical centres and health research facilities.

The balance of the development – the seniors’ living accommodation – is not sufficiently related to uses contemplated in Clause 14 and should, therefore, not be declared to be State significant development.

**2. Site inappropriate for seniors housing**

The proposed site is inappropriate for seniors’ housing:-

- the topography of the site mitigates against easy access to public transport links

- the site is not located within easy access of services – retail and medical
- the site is not located near community facilities.

It is appropriate to assess the proposed apartments/villas against the requirements of the State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004. The proposed apartments/villas would not meet many of the standards mandated under this SEPP.

**The proposed development of apartments/villas for seniors housing should be refused on the grounds that the site is incompatible with such use and fails to meet the standards for seniors' housing in the State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004.**

### **3. Additional concerns**

#### **3.1 Tree loss**

The construction of the proposed apartments will require significant mature tree loss with little opportunity for replacement planting, given the extent of hard surfaces proposed around the perimeter of the apartments.

The construction of the villas will require removal of a large number of mature trees. These trees enhance the significance of Pallister House.

**The proposal should be reviewed to minimise tree loss and to ensure that the curtilage around Pallister House is consistent with its heritage significance.**

#### **3.2 Failure to meet key elements of Clause 33 of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004**

The built form of both the hospital development and the proposed apartments will detract from, rather than contribute to, the quality and identity of the area in which Greenwich Hospital is located.

The building form and siting relative to the topography of the site will result in a development that will dominate the adjacent residential area.

#### **3.3 The apartment building on the southern portion of the site disrupts the significant natural landscape features of the environs**

The proposed development will extend significantly above the trees and bushland that form the backdrop to Bob Campbell Oval. The height and presentation of the building will dominate the bushland setting – the development is completely out of character with the residential developments along the ridge above Bob Campbell Oval that all blend with their bushland setting.

**The design of the proposed apartment building on the southern boundary is inconsistent with Objective H1.5 of the Lane Cove Development Control Plan and should be revised.**

For the above reasons we object to this proposal and request the Minister to refuse it.

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