

## **Submission - Staged Redevelopment of Greenwich Hospital - [REDACTED]**

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### **1. Summary**

This submission examines the various reports for the Staged Redevelopment of Greenwich Hospital.

The submission draws attention to the fact that the zoning restrictions in the parcel are not allowing the development of senior living housing. It examines the negative impact this development will have on parking and traffic in the area. It brings to your attention the grave bushfire hazards from developing an industrial site next to a reserve and the additional risks for accidents from children trying to access the schools in the area. Finally, the submission argues that the planned senior living buildings will destroy the heritage value of the landscape, taking away a part of our local history.

The submission will point at the various inadequacies of the reports, asking for better planning around alleviating traffic and parking issues.

This submission argues that the area cannot accommodate such a development, as we are already suffering from the shortcomings of the existing arrangement. Doubling up the size of the current development sounds incomprehensible to the local residents. The Applicant should reconsider the scale of the development, and plan to redevelop the site to a hospital of the current size, but with parking and traffic management options that will correct the mistakes of the past. Applying for a development of double the size of the current hospital and without even addressing the current site issues is simply an affront.

Regards,

[REDACTED]  
[REDACTED]

## **2. Senior living housing on LEP SP2 land**

The hospital is in a SP2-Health Services Facility Zone. State Environmental Planning Policy (Infrastructure) 2007 defines as health services facility a facility 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 the following:

- (a) day surgeries and medical centres,
- (b) community health service facilities,
- (c) health consulting rooms,
- (d) facilities for the transport of patients, including helipads and ambulance facilities,
- (e) hospitals.

Senior living is not a health services facility. The State Environmental Planning Policy (Housing for Seniors or People with a Disability) defines as seniors people aged 55 or more years. In the proposed senior living housing, any person above 55 years old could occupy those new dwellings. SP2 is not for residential living and people over 55 years old are not in need of health services by default. Most of them will experience ten more years of employment before they even retire.

If we consider every healthy person above the age of 55 as in need to live near a health services facility, then SP2-Health Services Facility Zone can be used to build any other type of commercial activity that a 55 years old person would want to access, including entertainment venues, restaurants and supermarkets.

The parcel where the hospital stands was categorised specifically as Health Services Facility Zone in order to have facilities that will service the health of NSW residents, not need for luxury housing.

**On these grounds, we are against the proposal for developing senior living housing, as it is not applicable to the LEP SP2 zone.**

## **3. Inadequate Parking**

The current hospital has 78 beds and 150 parking spots, which have not been adequate and St Vincents Road has been used to accommodate the remaining parking needs, creating major traffic on this small local road. The new development will have 150 beds and 89 senior living units, bringing the total to 239 beds. Following the current resident to parking ratio of 1.92, which is already inadequate, the new parking spots should be 458. This means that the new development is short of 129 new spots, as it only proposes the allocation of a total of 329 parking places.

The parking assessment notes the minimum public transport available in the area.

The State Environmental Planning Policy (Housing for Seniors or People with a Disability) defines as seniors people aged 55 or more years. These proposed senior living units will have residents that will be more than able to have cars and willing to visit all the nearby shopping areas, or have friends to visit them all through the week. The topography around the Villas and the elevation of St Vincents

Road will make it impossible for seniors with disability to move around without a car. These units are targeting abled and mobile residents of 55 years old and older. The traffic they will generate will be greater than any in-hospital patient.

HammondCare has built in other areas a number of senior living units, called independent living housing in their brochures, where residents can “enjoy an independent lifestyle and a vibrant community”. One of them is in Hammondville, NSW. HammondCare can provide statistics on the need for parking spaces before they built those units and after. That can prove the true need for car parking spaces from senior living units.

**On these grounds, we are against the proposal, as it does not accommodate for the parking needs it will generate.**

#### **4. Access Road at St Vincents Road**

The current access road at St Vincents was built with a promise to the residents that it will be used only as an emergency. Today it is used by all staff to bypass the traffic deadlocks at River Road during peak time.

The proposal will not only generate more traffic on that access road, but it will change it from timed access that it is today to 24 hours access to the residents of the new villas.

St Vincents Road is a local road that already experiences heavy traffic loads at peak times, making it difficult for residents to enter and exit their driveways. The change of the time controlled access road to 24 hours usage for the residents of the villa will create even more traffic and make it even more hazardous for local residents to use St Vincents Road.

**On these grounds, we are against the proposal, as St Vincents Road cannot accommodate for the increase of traffic.**

#### **5. Heritage**

The proposal includes the building of senior living villas at Lot 4, DP 584287. That area is a Heritage Listing area in the State Heritage Register. The heritage item is not just the house in the middle of that lot, but the whole landscape, as the reason why it is significant is that Lot 4 is all that is left as an example of European settlement, including the use of the gardens and driveways, fenced paddock and pools.

The heritage report states that the context of this heritage area will be affected by the new development: “The development does alter the context of the heritage item by creating a denser built context, however Pallister can still be clearly understood and interpreted as a former substantial Victorian residence.”

The heritage reports focus on the house and the views FROM the house. Those views are only enjoyed by hospital staff, as the house is not open to the public. The heritage views are for the whole landscape, as it is enjoyed by the local residents. It is the whole Lot 4 with the heritage restrictions, not just the house. Pallister house is not visible from St Vincents Road, but the whole landscape is.

The current proposal will totally change the landscape, as from an open garden and trees area it will become the setting for two large housing complexes. The proposal has the removal of 50 trees from the heritage area and it is also mentioning the need of pruning down the remaining trees. Besides this affecting the connectivity of the local bushland corridor, it will translate this heritage area to a totally different landscape.

In addition, there is the proposal of the construction of new visitors parking at Pallister House and new landscaping within the heritage lot, changing the heritage landscape with new cemented footpaths, roadways and modern landscaping. The heritage report calls as an improvement the changing of the existing landscape by creating a formalised car parking arrangement. This might be an improvement of the car park arrangements, but it is also a degradation of the heritage value of the landscape. Heritage control is applied to maintain the heritage aspects of the area, not improve parking arrangements.

Through the years, to assist with growth and development of the area, most of the land that used to be part of the Standish property were given for resident housing and then to the hospital. The only space left was Lot 4, clearly marked as a heritage listed area, as a historic example of how the area was during the first century of European settlement. Allowing the development of those villas within this heritage listed landscape will steal from future generations the ability to experience the landscape of that significant period in Australia's history.

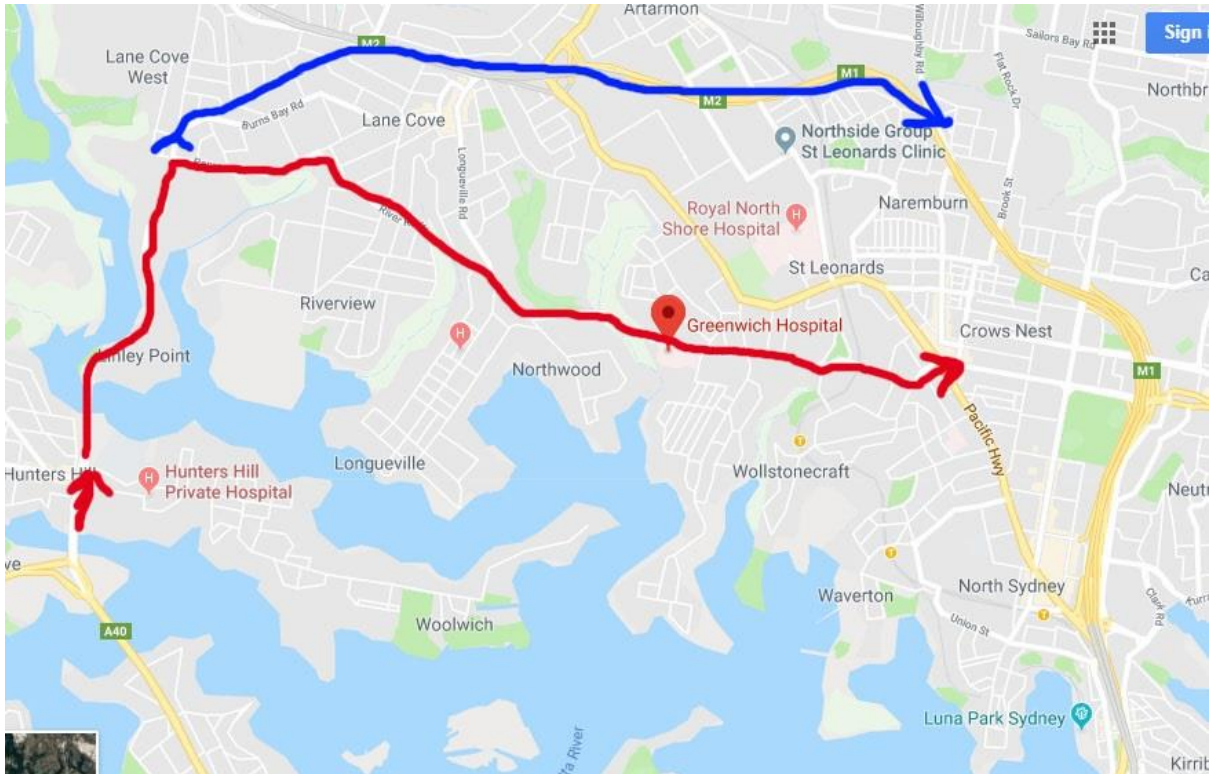
**On these grounds, we are against the proposal, as the senior villas will destroy the heritage value of Lot 4.**

## **6. Traffic**

The traffic report is grossly inadequate for the development and the area. It refuses to calculate the traffic patterns generated by drivers' behaviour to avoid traffic deadlocks in the area. The report concedes that "This rational behaviour of drivers optimizing their travel times is not reflected in the model as SIDRA is a micro-analytic tool". The traffic issues in the area are largely generated because of drivers' behaviour.

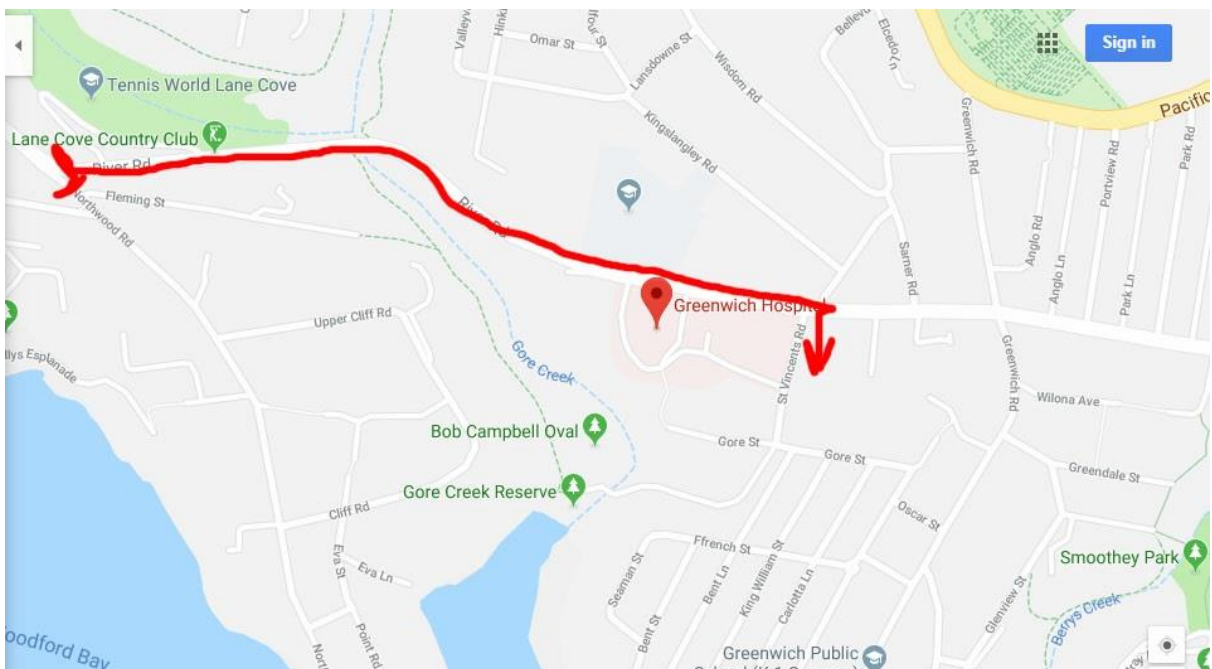
River Road is a 50km residential road, where a school operates next to it. However, the road network at the north shore of Sydney is funnelling a vast number of cars to this small residential road. The reason is that River Road is the first and quickest access drivers have entering the North Shore from Gladesville Bridge heading to North Sydney or Neutral Bay (see red line below).

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The other available option is to use Epping Road (see blue line above), which is not a preferred one as Epping Road experiences even worse traffic since the creation of the Lane Cove tunnel. At peak times, drivers will use River Road, even if it has large traffic volumes, as other alternatives are even worse for them.

St Vincents Road also experiences heavier traffic volumes than normal. There is a one kilometre stretch of road at River Road in front of the hospital that there are no left or right turns (see red line below).



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St Vincents Road is the first exit of River Road to the Greenwich peninsula. East bound drivers will turn right at St Vincents Road, to avoid the traffic deadlock at the top of the hill at Greenwich Road. Those are the drivers to Greenwich peninsula, including parents driving their children to Greenwich School (K-1 Campus), private school buses picking up children from Greenwich and staff accessing the hospital from the side access road.

See this video (<https://1drv.ms/v/s!ApFfH4x6m3-5gSDUw5xGCwhkb8J6>) to appreciate how this small residential road becomes a traffic hazard. The video was shot in front of the access road to the hospital. Cars have to wait behind parked cars for the oncoming traffic to clear and local residents have to be extra careful when they exit their driveways and parked cars block the view to the oncoming traffic.

The additional traffic issue from the intersection of St Vincents and River Road is that the two lane east bound traffic becomes just one lane when cars turning right into St Vincent Road have to wait for the oncoming traffic to clear. This creates even more traffic issues during peak time, as the two lane road becomes a one lane. The cars waiting to turn are piling up and after 5 or more cars are stopped, the tail reaches the top of the hill, which becomes a traffic hazard when cars find suddenly that lane blocked with no early visual warning due to the crest.



This is exactly the reason why the traffic report suggests blocking the right turn to the Emergency hospital entry for east bound traffic. However, this will just push all that traffic at the St Vincents Road, 100 meters down the road. It will not help the traffic on River Road at all, as those cars will still turn right at St Vincents Road and it will make the traffic at St Vincents Road even heavier.

All these issues are current. The traffic deadlock and hazards at St Vincents Road are current. The application has no suggestions to address the current traffic issues and on top, suggested that doubling the traffic will create no additional hazards.

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A proper traffic report would include comparison traffic volumes to similar residential roads in the area that are not affected by this preferred drivers' route. That would have brought up that River Road and St Vincents Road are not typical residential roads, but main traffic arteries in the area, serviced by basically a one lane access lane.

In addition, HammondCare can produce comparison reports on the traffic effects of their building by providing traffic volume surveys before and after construction on other buildings they manage, like in Hammondville, NSW.

**On these grounds, we are against the proposal, as the locality that the hospital is built upon has special traffic needs that cannot accommodate a development as the proposed one is.**

### **7. Bushfire Hazard**

The area is next to a reserve which already has Bushfire hazards associated with the development. While the Bushfire Hazard Assessment considers how to minimise risk from a bushfire, we all need to understand that if a fire does occur from one of those new buildings within that area, the results could be catastrophic.

The fire can spread to the adjacent reserve and threaten many residential houses next to it. It can also engulf other buildings in the hospital, asking for the evacuation of 600 patients and staff. It is one thing to consider the risk of fire from a residential building and the way to control it, and another to have a fire generated from industrial hospital machinery. It is unwise to allow this heavy industrial development so close to a reserve.

Hammondcare has not been bushfire sensitive on the current Lot 4, where the area has accumulated bushfire fuel, with bark, leaf litter and cut-off logs creating a hazardous blanket in the area. Lot 4 is left unmaintained, to prepare it for the intended flattening (see attachment "photos"). Paid bushfire reports could be voluminous, but they do not ensure that the written suggestions are followed. It will only take a small oversight, like what we can witness today in Lot 4, and the whole area will be lost forever, even taking human lives in the process. This is why we need to look beyond reports and do a risk analysis on the damage that the worst case scenario can create. This is why it is not prudent to allow these building to be developed so close to the reserve.

**On these grounds, we are against the proposal, as the hospital extending its building closer to the reserve will elevate the danger of fire spreading throughout the reserve.**

### **8. Greenwich Public School**

The hospital is opposite to Greenwich Public School. The limited parking in the area makes it very hard for parents to access the school. The intersection at St Vincents Road makes it impossible to



drive through River Road to the other side of St Vincent Road and access the school from the side streets.

In addition, children coming from Greenwich peninsula have only one crossing to reach the school: the main traffic lights at the hospital. Increasing the volume of traffic to double will mean that children will have to navigate daily through all the extra traffic, both pedestrian and cars accessing the hospital car parks.

**On these grounds, we are against the proposal, as there has been no accommodation for the safety of the children attending the school opposite to the hospital.**

## **9. Construction**

The construction site will be of a major scale. It has two major issues: access and disturbance to residents.

The area is basically at the edge of a cliff. There is only access for heavy vehicles from the main entrance with very limited access on the side entry due to large elevation from the road. The entrance to the hospital is from the very busy River Road and any vehicles accessing the street after 7 am will create a deadlock. In addition, any traffic interruption to the slow flow of River Road will create traffic that will see cars at a standstill from outside the suburb wanting to pass through. There is no "rear access" that can be utilised. The whole construction will take place right in front of the main street, at the footpath that children use to access their school. Development approval should not be granted until the applicant can produce a working solution that will not block access to the whole suburb.

The construction will have major impact on the residents. As the land is at the top of the hill and with construction extended many levels up, the noise and dust pollution will affect residents from many blocks away. Strict controls should be placed on hours work will take place, the days of the week, and the total duration of the project. Local residents should be screened off from noise and dust. If houses are affected by dust or mud, cleaning services should be offered on a regular basis to upkeep the houses to a liveable state. If roads and footpaths are affected during construction, they should be fixed on the day, not at the end of the project. As this is not an industrial area, but a residential area, construction should take place with extra care not to affect the enjoyment of living in the area of the local residents.

**As no serious allowances are made to ensure that residents will not be affected by the construction of the development, we are found to be against this proposal.**