

3 March 2019

Secretary  
NSW Department of Planning & Environment  
GPO Box 39,  
Sydney NSW 2001

Submitted via Department of Planning & Environment Major Projects web site

Dear Madam

**RE: State Significant Development SSD 17\_8699 – Greenwich Hospital, 97 – 115 River Road, Greenwich**

Please accept this as my submission for your consideration on the State Significant Development SSD 17\_8699 Staged Redevelopment of Greenwich Hospital (Concept Proposal) which is currently on public exhibition until 15 March 2019 by the New South Wales Department of Planning & Environment.

Attached is a report prepared by Assiduity with comments for your consideration.

The Concept Proposal is for the redevelopment of Greenwich Hospital, comprising of;

- 150 place Hospital health care facility with a mix of inpatient hospital beds, palliative care beds and residential aged care beds (currently 78 thus an increase of 72);
- Inpatient and outpatient support services;
- 80 new seniors living units (apartments) addressing River Road and 9 new seniors living units (villas) addressing St Vincents Road (currently Nil thus increase of 89);
- Heritage listed Pallister House will be retained; and
- 329 onsite car parks (currently 150 thus an increase of 179)

The concept proposal seeks to double the height and size of the hospital, add 80 new Seniors Living Apartments in two 6 level (including above ground podium carpark) buildings plus 9 new Seniors Living Villas, remove in excess of 50 trees from the site and double traffic volumes on the site.

I have reviewed the Environment Impact Statement submitted for the Concept Proposal and provides the attached report of comments for your consideration. This review of the EIS is constructive and should be informative to the Department of Planning & Environment when submitted by you.

This Concept Proposal, if approved, is highly likely to have a significantly adverse effect on my home and family both in the current quiet enjoyment of our property, privacy and the future value of our property. The Concept Proposal's inclusion of the Seniors Living Apartments at the bulk and scale proposed and the siting of the Seniors Living Apartments, offers no community benefit to the citizens of Greenwich and Northwood.

The State Significant Development approval pathway adopted by the development applicant, HammondCare, offers the applicant the opportunity to exploit the State Significant Development status of a health facility development and combine this with the lack of existing town planning controls on the site under the Special Purpose zoning. This pathway is detrimental to the local community in this instance as the Senior Living Apartments and Villas which are included in the Concept Proposal are not health related accommodation. In effect this pathway enables the bypassing of planning application processes legislated in New South Wales that seek to protect the interests of the community and local citizens.

We currently have a harmonious relationship with the hospital despite its 24 hour 7 day a week operations without complaint however the Concept Proposal appears to have little regard for the impact on us as a neighbour immediately adjacent to the hospital.

I object to this proposal as it is presented but do not object to development and refurbishment of the hospital in some form and the continued delivery of high quality aged care services to the community however the bulk, scale and density of the proposal is disproportionate to the surrounding urban context, is not required for a health facility and the siting of the development heavily impacts your properties as well as those other properties to the west of the hospital.

Find attached detailed comments on the issues and challenges that impact the residents and the community for review and consideration for inclusion in your submission to the NSW State Government.

Yours faithfully

A solid black rectangular box used to redact the signature and name of the sender.

**RE: State Significant Development SSD 17\_8699 – Greenwich Hospital, 97 – 115 River Road, Greenwich**

Comments on the Staged Redevelopment of Greenwich Hospital (Concept Proposal) as exhibited by NSW Department of Planning & Environment:

**1. State Significant Development planning approval pathway.**

- The State Significant Development approval pathway adopted by the development applicant, HammondCare, offers the applicant the opportunity to exploit the State Significant Development status of a health facility development and combine this with the lack of existing town planning controls on the site under the Special Purpose zoning and seek approval for non health related commercial activities.
- The applicant is seeking to include the seniors living accommodation under the State Significant Development approval pathway noting that “The proposed development is predominantly a hospital campus with a main hospital facility that includes inpatient hospital beds, palliative care beds, residential care beds and outpatient services. The associated seniors living units are an integral part of the hospital campus and the HammondCare ‘continuum of care’ model”. This statement should be challenged as the utilisation model proposed by the applicant is for the accommodations units to be occupied under a “bonding” model and thus are a separate commercial venture.
- The SSD pathway is detrimental to the local community in this instance as the Senior Living Apartments which are included in the Concept Proposal are not health related accommodation. In effect this pathway enables the bypassing of planning application processes legislated in New South Wales that seek to protect the interests of the community and local citizens.

**2. EP&A Act compliance.**

- It is noted in the EIS in section 7 .1.1 Environmental Planning and Assessment Act 1979 in Table 6 (g) that “The proposed development is appropriately located and proportioned and will assist in creating visual interest and contribute to public amenity”. As noted throughout this submission, the bulk and scale of the proposed development is not sympathetic to the surrounding urban context and has significant adverse impact on the surrounding residents.
- Further in Table 7 (b) it is noted that “The proposed development has been designed with regard for potential impacts on both the natural and built environment. Appropriate mitigation measures and recommendations have been sought”. As noted above and throughout this submission, the mitigation measures fail to properly address the impact of this development, its bulk and scale, the increase in traffic and the elimination of mature and established landscaping which should be preserved to mitigate the impact.

**3. SEPP compliances.**

- The EIS notes in section 7.2.3 that the proposed Seniors Living Apartments complies with the 9 design principles of SEPP65. However with the bulk and scale that is not sympathetic to the surrounding urban context, it is unlikely that appropriate compliance with SEPP65 can be

achieved. Further the building form layout is unlikely to be fully compliant with Principle 6 Amenity for solar access.

- The architect Bickerton Masters is a reputable and experienced firm that specialises in Health, Aged Care and Education facilities with the majority of their work in Queensland. Residential Apartment Design in New South Wales must comply with SEPP65 and the Apartment Design Guide. This is a specialist field of design and one in which the NSW Government, the property development industry and the residents of New South Wales embrace. It is apparent in reviewing the EIS and the architectural designs that SEPP65 compliance and Apartment Design have not been given the due respect and consideration that is expected of residential design. Seniors are residents and deserve compliance with the rigorous design guidelines that residents and taxpayers of New South Wales expect.

#### **4. Height of the proposed seniors living apartment buildings.**

- The current planning controls for the site do not have height limits and the Concept Proposal exploits this without any proper regard to the surrounding urban context of the site.
- The building heights for the Seniors Living Apartment buildings to be located to the west of the site, are excessive and will have a detrimental impact to the surrounding area.
- This is further extenuated with the proposed location of the buildings to the west of the site.
- The view montages in Annexure B1 are taken from strategic locations to support the height in the submission. They do not demonstrate properly the impact of the height from areas where the view impact is significant.
- The site photos in section 3.6 of the EIS exclude a picture of the west entrance to the hospital off River Road and such that the Department cannot properly assess the impact of the proposed height on neighbouring properties to the west.



Figure 1: Western entrance to Greenwich Hospital from River Road with 117 River Road residence shown

- Photograph 11 only shows one of the vehicle access points.



- The houses to the west of the site will be dwarfed by the seniors living apartment building height.



Figure 2: Current buildings on the north west corner of the site with western entrance shown. Current height is single level with pitched roof. Submission has not provided a comparative photomontage of this location to demonstrate the proposed changes with the 6 level Senior Living Apartment building.

- Figure 16 of the EIS does not accurately demonstrate how the bulk and scale of the proposed Seniors Living Apartment buildings fits with the houses to the west.
- The photomontage pictures provided in Appendix B1 Architectural Plans are strategic and do not accurately illustrate the impact of the bulk and scale of the proposal along River Road to the north west of the site. They are taken before a crest in River Road to distort the impact.



Figure 3: View west along River Road showing west entrance. This photo is to the west of the road crest that is shown in Appendix B2 to the ESI.

- The Department of Planning cannot properly assess the impact of the proposal to the surrounding area with the incomplete information it has been provided with. Further the EIS fails to properly attend to the SEAR's item 3 Built Form and Urban Design on the impact of bulk and scale on surrounding built form and item 4 Amenity.

#### 5. **Tree removal and landscaping:**

- The proposal identifies the removal of a significant number of established trees and landscaping to the north west corner and the west perimeter of the site to cater for the widening of the access road and the footprint of the Senior Living Apartments and visitor parking at grade.
- Figure 4 of the EIS is incorrect and does not accurately show the extent of established trees to the west of the site. Further as noted above, the EIS excludes a site photograph of this western boundary which would accurately show the extent of established trees and landscaping along the western perimeter. Figure 2 Aerial Photo of Locality in the EIS evidences this discrepancy.
- Table 3 of the EIS notes a benefit of the preferred concept is the retention of perimeter landscaping however the landscaping plan proposes significant removal of established trees to the west exposing the neighbouring properties to the significant bulk and scale of the Seniors Living Apartments.
- The western access road is significantly higher than the residential properties to the west due to the fall of the land away to the south west. This height difference impacts on the privacy of the houses as pedestrians and car occupants overlook the properties. This is currently mitigated by the existing established trees and the low volume of traffic that use the road. With the road proposed to be widened, moved closer to the western boundary and pedestrianised, the proposal has a significant detrimental effect on the residents of the houses to the west.



- With inaccurate information the Department is not able to accurately assess the impact of the proposal nor the impact of the bulk and scale of the proposed Seniors Living Apartments on the area and the neighbouring properties.

**6. Proposed widening of western access road**

- The proposed widening of the western access road is only to allow for the footprint of the Seniors Living Apartments to move closer to the western boundary. This is unnecessary if the building was moved to the east.
- The road widening requires the installation of a gabion retention system which requires more of the existing landscaped area to the western perimeter to be removed. Retention of the existing road western edge location would enable preservation of the established trees and not require the retention infrastructure.



Figure 4: View of backyard of 117 River Road across to hospital roadway. Note the elevation of the road above the rear yard boundary fence. The red arrow indicates the roadway. The hospital site trees in this picture are proposed to be removed.

- The installation of the gabion retention infrastructure brings the proposed development closer to the houses on the western boundary to the site thus bringing traffic closer to residential houses.
- Figure 20 of the EIS does not show the location of the residential houses to the west and thus does not enable the Department to assess the impact of the proposal.
- The western access road is significantly higher than the residential properties to the west due to the fall of the land away to the south west. This height difference impacts on the privacy of the houses as pedestrians and car occupants overlook the properties. This is currently mitigated by the existing established trees and the low volume of traffic that use the road. With the road proposed to be widened, moved closer to the western boundary and pedestrianised, the proposal has a significant detrimental effect on the residents of the houses to the west.

**7. Stormwater impact of proposed alterations to western boundary and road widening**

- The landscape area to the west drains to a dish drain which runs along the boundary of the hospital and the houses to the west. This is currently damaged and with excessive rain the properties to the west are inundated with water during heavy rain events. The proposed narrowing of this area, the installation of a retention system to support the road widening which is impervious and the removal of existing mature established trees, there is a potential for the rain inundation to increase.
- The Stormwater Management Report at Appendix I1 to the EIS does not note this issue.
- Notwithstanding that stormwater infrastructure may be installed to attend to this, the extent of the infrastructure could be significantly reduced and thus reduce the development impact if the established landscape area to the west is not impacted by the development.

**8. Basement carparking entrance**

- The proposal has the basement car park entrances and exits under the Seniors Living Apartments coming off the western access road. This appears to be the car park for residents and staff. The traffic movements will have a significant detrimental effect to the residents of the houses to the west of the site as all traffic movements will come through this pincer point.
- The residents of the houses to the west should not have to be adversely impacted by this proposal. There are a number of design alternatives that could be explored to relocate these entrances and eliminate this impact on the residents.

**9. Traffic**

- The Traffic and Parking Impact Assessment report notes that the development will increase traffic generated by the development by 100%.
- It is noted that the traffic studies were conducted over one day being Thursday 12th October 2017. This data is not representative due to the limited sample dates and the fact that a Thursday is the lightest traffic day for River Road as experienced by the local Greenwich residents.
- River Road has become a major road with increased traffic since the State Government altered Epping Road in an effort to force traffic into the Lane Cove Tunnel. Traffic that is travelling to Burns Bay Road that would have used Epping Road now use River Road.
- If the Department is to properly assess this development proposal then it should rely on accurate and balanced data and the Traffic and Parking Impact Assessment report is not such a document.
- The proposal sees the west road as the main roadway for the hospital employees, service vehicles and patients. The more effective solution for mass traffic movement would be to signalise the intersection of St Vincents and River Road and amplify the St Vincents Road entrance.

**10. Noise**

- The proposal for the widening of the west access road, the movement of the road closer to the residential properties on the west boundary, the increase in traffic movements and the intensification of care operations will have a significant adverse impact on the residents due to the noise generated.



- Currently heavy service vehicles (trucks) enter the site during the night after 10pm and before 7am which disturbs the residents to the west. With more hospital beds this is likely to amplify activity.
- The movement of the car park entrance and exit to be opposite the residential properties to the west and against bedroom will also significantly disturb the residents.
- The basement car park will have a ramp exit and this will result in vehicles accelerating to move up the ramp. With the vehicle in the basement which will be an acoustic amplifier, this will further disturb the residents.
- Currently the residents are not significantly impacted by the traffic noise of the hospital in the evenings or overnight however this development is likely to reverse this significantly.
- The fence between the hospital and [REDACTED] River Road and [REDACTED] River Road is part timber and part wire mesh. This is an insufficient barrier to noise being generated from the hospital.

#### **11. Impact on Greenwich State School**

- The NSW State Government is currently investing substantial capital expenditure in increasing the size of the Greenwich Public School to cater for the increase in school enrolments.
- Greenwich Public School is located on the north side of River Road opposite the hospital.
- The combination of the increased traffic generated from the Greenwich Hospital Development with the increased traffic, both pedestrian and vehicle, that results from the Greenwich Public school has the potential to compromise the health and safety of the schools pupils.
- The Traffic Management Report makes no reference to the Greenwich Public School works and does not address this impact.
- Further the bulk and scale of the senior living apartments combined with the eradication of mature and established trees and landscaping compromises the visual amenity available to the pupils.