

**Re SSD 17\_8699 - HammondCare, Redevelopment Greenwich Hospital Site, EIS and Concept Plan Exhibition**  
**SUBMISSION BY: Bryan Le Bransky 29 Upper Cliff Road, NORTHWOOD, NSW 2066**

10 Environmental Impact Assessment	Page ref	COMPLAINT	COMMENT
General		<p>HammondCare proposal over-develops the site, including non-health related residential apartments and villas. The redevelopment is focussed on financial profit. The proposed non-health related residential apartments and villas contravene the land SP2 land zone definition which refers to hospital buildings and facilities.</p> <p>Proposed built form and urban design produces an extensive concentration and solid mass of buildings and facilities that are not well integrated with the local residential communities and bushland areas of Greenwich and Northwood.</p> <p>HammondCare ESD design is minimal, excludes solar arrays for electricity generation; solar hot water for hot water services; vertical gardens; stormwater and waste water recycling and reuse; pre-treatment of waste products to significantly reduce contribution to landfill waste.</p> <p>HammondCare development ignores community amenities that can be shared by patients, visitors and employees. Needs to include recreational and fitness facilities that pro-active support health care and prevent the onset of preventable illnesses.</p> <p>HammondCare development will significantly cause an escalation in noise amplification,</p>	<p>HammondCare should dispose of the Greenwich site. The site is nested in a residential area and the site is better suited for residential development, especially given the lack of affordable accommodation and rental opportunities in the area. Lane Cove Council planning controls will ensure a well integrated, well scaled and environmentally sensitive development supporting local community and residential needs.</p> <p>NSW Government and Lane Cove Council should stop HammondCare developing this site because the large proportion of residences do not refer to the SP2 Zone, specifically defined for health facilities and services only.</p> <p>HammondCare should be requested to relocate proposed services to a more suitable site, preferably in a health precinct similar to the RNSH/Ramsay Health at St Leonards. The Greenwich Hospital is no longer fit for purpose, and the proposed development shows HammondCare will only deliver a limit level of health facilities and services.</p> <p>See EIA sections for further details.</p>

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		traffic congestion. The dense mass and tall building structures escalate noise reflection, amplification, echo towards Northwood residents.	
10.1 Built Form and Urban Design (SEAR 3)	67	<p>Zone SP2 EXCLUDES the provision of general residential for seniors/over 50s/retirees.</p> <p>Built Form indicates 75% of extensive hard surfaces (buildings, car spaces, roads, landscapes) which significantly damage the natural/conserved environment.</p> <p>Extensive shadowing events are caused by the new buildings, causing significant shadowing and darkness across all areas of the site and outside the site.</p>	<p>Development contravenes land zone (SP2) definition is specified for health facilities only. The proposed residential developments (apartments and villas) appear to involve seniors/over 50s/retiree apartment living, and do not represent a so called “continuum of care” as defined by HammondCare (EIS, p39).</p> <p>In accordance with schedule 1 clause 14 of the State and Regional Development SEPP the proposed development is classified as State significant development because it is predominantly a hospital as defined below:</p> <p>14 Hospitals, medical centres and health research facilities Development that has a capital investment value of more than \$30 million for any of the following purposes:</p> <ul style="list-style-type: none"> <li>(a) hospitals,</li> <li>(b) medical centres,</li> <li>(c) health, medical or related research facilities (which may also be associated with the facilities or research activities of a NSW local health district board, a University or an independent medical research institute).</li> </ul>
		<p>Lost opportunity for more extensive ESD and building services that better integrate with the proposed HammondCare health campus, local surrounding community and environment.</p>	<p>ESD is severely limited. No solar arrays. No solar hot water. No vertical gardens for cooling, shade or integration with surroundings. No recycling of large volumes of stormwater for community use (eg Bob Campbell Oval, Greenwich Primary School). No mention of waste recycling to reduce landfill impacts. No mention of cross flow ventilation and vertical gardens to cool built and natural environments, reduce reliance on air conditioning.</p>

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		Proposed proportion of building infrastructure, car parking, road ways, and other hard surfaces, covers almost 75% of the site, greatly restricting the area available for green spaces, such as gardens, and natural habitats for flora and fauna.	Approx two thirds (2/3) of the total site involves residences for seniors/over 50s. And the built form footprint, including all hard artificial surfaces, appears to cover about 75% of the total site, leaving only about 25% of the site for any chance of minimal disturbance to native flora and fauna, concentrated on the perimeter of the proposed concentration and widespread footprint of building and hard landscape surfaces.
		Significant generation of noise , generated from River Road traffic ,and site building plant and equipment, will be reflected and amplified directly to Northwood residents, especially on Upper Cliff Road and Private Road, due to the massive solid mass of the two proposed apartment buildings established directly above the remnants quarry. The solid western face of the aggregated apartments will be represent a massive vertical monolith of 7,000 m2, according to the proposed buildings' height 70 m and buildings' width of 100 metres.	The built form on the western side of the site (facing Northwood) proposes a massive solid block of two residential buildings, approx 60-70 m high (6 to 7 storeys) and 100 metres wide, representing a massive vertical monolith with as surface area of 7,000 m2 . Any noise will rebound off and become amplified from the proposed massive solid structure of aggregated apartments on the western side of the site, located directly above the remnant quarry, Bob Campbell Oval and Gore Hill Reserve. The combination of these massive buildings on the edge of the quarry face will create an acute level of amplified and rebounded sound from: constant traffic flows on River Road; major building (mechanical) plant, air conditioning units, and machinery and equipment from the site; and regular passenger jet/aeroplane noise travelling west to east directly over the Northwood-Greenwich area. Northwood homes and residents will experience an escalation and intensification of noise from both the major plant of the new buildings/facilities; the increasing traffic volumes along River Road (trucks, buses, cars, motor cycles); and intensification of aeroplane noise from passenger jets flying on the regular west to east flight path towards Sydney Harbour and Heads; and the amplification of noise from various sport activities on the oval below.

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		Significant disturbance from heat and glare to residents, flora and fauna due to the immense development of residential apartments located on the western side of the site, directly above the remnant quarry, Bob Campbell Oval and Gore Hill Reserve.	The mass of building structure created by the two apartment blocks will be a significant heat sink in hotter months. Facing directly west, the radiant heat and reflection from glazing will be directed towards Northwood residents, local flora and fauna.
10.2 Amenity (SEAR 4)	76	<p>Lacks fitness/health facilities for a healthy/fit lifestyle. Loss of opportunity to the health campus and the local community.</p> <p>Lacks campus or community services/spaces eg film-TV theatre, meeting/conversation rooms, meditation rooms, laundry facilities. Loss of opportunity to the health campus and the local community.</p>	<p>According to the land zoning (SP2), all proposed residences depend on medical attention or intervention or aide (24/7).</p> <p>The proposed development only indicates amenity in the form of a canteen, campus landscapes/gardens and a limited walkway for patients, residents, visitors and employees.</p> <p>Apart from a canteen, there are no shopping outlets for household/personal needs, hairdresser/beauty therapy services.</p> <p>There are no sports or gym facilities to support a healthy/fit lifestyle or activity. There are no active facilities for swimming, spa, sauna, badminton, table tennis, squash etc. There is no consideration for the general public for access to such facilities either.</p> <p>Do HammondCare want the residents and local neighbours to remain unhealthy or is HammondCare providing a healthy lifestyle for healthy resident, or residents post-medical intervention, or patients pre/post medical intervention or expecting neighbours to relocate to the HammondCare campus when they get sick or become unhealthy?</p> <p>There are no onsite general shopping services available for the proposed living units, proposed as follows:</p> <ul style="list-style-type: none"> <li>➤ 80 new seniors living units (apartments) addressing River Road, and</li> <li>➤ 9 new seniors living units (villas)</li> </ul> <p>The total number of (over 50s?) residents is not mentioned, however, the proposed number of "living units" could total 140-160, depending on the number of bedrooms and/or size of bed (single, double). This suggests the residents will need to seek household supplies "off</p>

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10.3 Staging (SEAR 5)	80	No indication of how long the development will take to complete.	No indication of how long the development will take to complete. EIS Table 15 p81 lists possible stages but no estimated timeframe. For example, will it take 2 years, 3 years, 5 years, 7 years to fully complete the overall project work according to the concept plan?
10.4 Transport and Accessibility (SEAR 6)	82	<p>Not objective.</p> <p>Not detailed.</p> <p>Conflict of interest &amp; influence with NSW Government eg RMS.</p> <p>Misleading insincere report.</p>	<p>Appendix G - Traffic and Parking Impact Assessment Report</p> <p>ROAD CONDITION – River Road is a “rat run” for increasing volumes of traffic. Significant volumes of heavy vehicles have cause major deterioration of the road structure. A significant renovation and underpinning of River Road took place in the last 3-5 Years near Greenwich Hospital, highlighting the intensity of road usage, especially heavy vehicles. River Road is NOT a highway but it is a relied on by RMS as a major arterial roadway. River Road does not have a multiple lanes from Shirley Road to Gore Hill Reserve but the RMS is reliant on River Road to carry 1000s of car per day to the detriment of pedestrians, cyclists. Between Shirley Road and Blaxland Corner (about 3 km), there is only one set of traffic lights for pedestrian crossing (located near Greenwich Hospital) opposite Greenwich Primary School to facilitate a safe crossing point for school children and bus commuters.</p> <p>TRAFFIC - This study appears to be unduly influenced by NSW RMS consultation/directives, and endangers future road users because of the large and escalating volume of traffic using River Road. Study says an increase in car movements by approx 100 cars AM and PM appear to be considered insignificant by this report/consulted experts/agencies. However, the estimated increase in cars is flawed because it only focuses on the proposed hospital redevelopment, and does not refer to the escalation of car numbers from neighbouring suburbs of higher density housing developments, and the increasing congestion from traffic flows.</p>

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			<p>Identified “peak hours” period for traffic counts is not only misleading but fails to recognise the traffic flow volumes during the morning and afternoon that last for more than one hour.</p> <p>Lack of objective criticism for forecast car movements from St Vincents Road, especially during peak periods. Serious impacts on River Road are not analysed objectively or effectively indicating serious bias from the Consultant. Increased probabilities for rat-run behaviours through back roads (via Gore Road) of the Greenwich area are ignored.</p> <p>Right-hand turn dangers from River Road into and out of St Vincents Road, especially during peak periods, or traffic disruptions, is not seriously/objectively covered by the Consultant.</p> <p>SERVICE VEHICLES - There is no reference to service vehicle like waste collection trucks, supply vehicles (eg food, health etc). The frequency and timing of waste collection services impacts on noise disturbance to the local area.</p> <p>PARKING - estimate of almost either 330 spaces (p14 of the special study) or required minimum 200 spaces (est 181 spaces of the special study) is not detailed in relation to the site provision of car spaces, either the EIS/concept plan or this special study (Appendix G).</p>
10.5 Noise and Vibration (SEAR 7)	83	<p>Lack of information.</p> <p>Lack of details.</p> <p>Misleading insincere report.</p>	<p>Lack of information/detail about proposed noise levels during construction especially for proposed excavation works for foundations, car parking and land forming.</p> <p>No details about level of noise and proposed mitigation treatment for major building plants, cooling towers, air conditioners for all hospital facilities and residential units/apartments/villas.</p> <p>No mention or details about operational controls for major plant, air conditioning and other site equipment.</p> <p>No details about noise levels from waste and delivery services eg waste pick-up, time, day.</p> <p>No details about the location of waste containment and pick-up areas.</p> <p>No details about ambulance parking/delivery location/s/frequency of ambulance traffic movements, expected change in noise impacts post-</p>

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			development completion
		<p>Significant noise levels , generated from River Road traffic and building plant and equipment, will be concentrated and intensified, amplified, reflected and echoed directly to Northwood residents, especially on Upper Cliff Road and Private Road, due to the two proposed apartment buildings to be established directly above the remnants of the quarry.</p> <p>These two buildings alone (excluding the proposed Hospital building and facilities, the Pallister Building and open car parking areas) represent a massive monolith with a surface area of approx 7,000 m2 (according to the proposed building height of 70 m and total combined width of 100 m).</p>	<p>The built form on the western side of the site (facing Northwood) proposes a massive solid block of two residential buildings, approx 60-70 m high (6 to 7 storeys) and 100 metres wide, representing a massive vertical monolith with as surface area of 7,000 m2 . Any noise will rebound off and become amplified from the proposed massive solid structure of aggregated apartments on the western side of the site, located directly above the remnant quarry, Bob Campbell Oval and Gore Hill Reserve. The combination of these massive buildings on the edge of the quarry face will create an acute level of amplified and rebounded sound from: constant traffic flows on River Road; major building (mechanical) plant, air conditioning units, and machinery and equipment from the site; and regular passenger jet/aeroplane noise travelling west to east directly over the Northwood-Greenwich area. Northwood homes and residents will experience an escalation and intensification of noise from both the major plant of the new buildings/facilities; the increasing traffic volumes along River Road (trucks, buses, cars, motor cycles); and intensification of aeroplane noise from passenger jets flying on the regular west to east flight path towards Sydney Harbour and Heads; and the amplification of noise from various sport activities on the oval below.</p>
10.6 Ecologically Sustainable Development (SEAR 8)	84	<p>Lack of information.</p> <p>Lack of details.</p> <p>Lost opportunities not assessed or reported</p> <p>Misleading insincere report.</p>	<p>No details about ESD rating of buildings, facilities or equipment eg NABERS, Greenstar.</p> <p>Neglects any inclusion of solar arrays, solar hot water, vertical gardens.</p> <p>There is no measure of lost opportunity to install solar arrays or solar hot water systems.</p> <p>There is no consideration for solar electricity and/or solar hot water generation that could support the local community/residents/school.</p> <p>No consideration of cross-flow ventilation and vertical gardens to cool interiors and exteriors of buildings and facilities, reduce reliance on artificial air-conditioning.</p> <p>No consideration of vertical gardens on buildings to integrate and harmonise with outside areas, reduce radiant and absorbed heat loads</p>

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			<p>especially during warm/hot months.</p> <p>There is no consideration for harvesting storm water for use by the local community, local park area (Gore Creek "Bob Campbell Oval"), Greenwich Primary School.</p> <p>There is no quantitative measure of the proposed volume of water harvesting (eg water tanks) that will/could occur onsite.</p> <p>There is no indication of what (if any) waste treatment methods will be established to reduce land fill, reduce volume of waste products, volume and types of waste materials for recognised (local) recycling processes, volume of hazardous waste (eg medical/surgical waste-products).</p> <p>No measure of impact and volume of sewerage waste, impact on local sewerage system or environs.</p> <p>No measure of impact of power/gas requirements, or impact on local infrastructure such as substations, cabling and piping.</p> <p>No indication of what UPS/auxillary power supply will be installed/operated during a power failure.</p> <p>No measure of impact on communications eg NBN, WiFi.</p> <p>Stormwater treatment appears to flow directly into the riparian/estuarine/river areas. There appears to be no study on the impact from the volume of stormwater entering these sensitive ecosystems.</p> <p>All proposed built forms and urban design principles SHOULD BE sustainable, and sensitive to both urban and environmental surrounds; SHOULD ensure all approved buildings maximise sensitive integration with the local urban and wildlife environments, and minimise disturbance to local residents and wildlife habitats.</p>
10.7 Biodiversity (SEAR 9)	85	<p>No factual account or survey of local endemic wildlife populations</p> <p>Empirical data of wildlife surveys are unreliable, misleading, insincere</p>	<p>Three (3) Reports (Appendix N1, N2, N3) - These three reports about approx 3.4 hectares (total site) only highlight the removal of 3 trees that are expected to provide a suitable roosting habitat for large footed Myotis (a vesper bat species) (N2 - p 61). However, the development maps clearly show that the footprint of buildings and car parks/spaces will remove a very large component of established shrubs/trees that provide significant habitat, shelter and connective corridors for various local wildlife populations that involve small contained populations (TEC,</p>



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			<p>Principle 2).</p> <p>Therefore, expect HIGHLY SIGNIFICANT DISTURBANCE &amp; IMPACT on unique endemic flora and fauna across the whole site.</p> <p>These 3 reports DO NOT list the names or show images/pictures of endemic species that survive in small populations on the site such as owls eg powerful owl, tawny frogmouth; monotremes eg echidnas; reptiles eg water dragons, skinks, snakes; bush turkeys; parrots &amp; lorikeets eg king parrot, rainbow lorikeets; other LARGE birds like kookaburras, currawongs, magpies, honeyeaters, cockatoos, galahs; other SMALL birds like thornbills, wrens, whipbirds.</p> <p>There are no quantitative FACTS about the size of endemic populations, the report relies on “threatened species” reports that are out-of-date and/or do not directly relate to this site. So called “surveys” involve listening for wildlife calls in the early summer (Nov, Dec) during a drought period.</p> <p>No trapping methods (eg net or camera) were included in the area study. These reports do not bother to examine the rich diversity of the site, or indicate that this proposed development will severely impact on the local flora and fauna inhabiting the 3.4 ha.</p>
10.8 Heritage (SEAR 10)	86	Encroachment of new hospital building directly adjacent to Pallister Building undermines/threatens the integrity of the heritage value of the Pallister Building and landscape/site surrounds.	Due to intensive development and proximity, the proposed new hospital buildings and facilities, and the extensive scale of residential apartments and villas, severely undermines/threatens the integrity of the heritage value of the Pallister Building and landscape/site surrounds.
10.9 Aboriginal Heritage (SEAR 11)	88	No proper investigation. No consultation with aboriginal community and/or elders.	EIS does not provide any evidence of a conclusive site investigation. The EIS does not report any consultation with the regional aboriginal community and/or elders. Given the site will be excavated and totally rebuilt, the uncovering of aboriginal remains and artefacts would be expected.
10.10 Contributions (SEAR 12)	90	Pending development approval, and calculation of the S94A Contribution Plan or Voluntary Planning Agreement by Lane Cove Council. Any development of the 3.5 ha site must ensure significant contribution to local community/public infrastructure and	Pending development approval and calculation of the S94A Contribution Plan or Voluntary Planning Agreement by Lane Cove Council. The massive HammondCare development should involve a significant financial contribution to Lane Cove Council to support the upgrade of the community amenities, including the nearby Greenwich Library and Community Centre, local footpaths, local roads, pedestrian

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		services, develop and upgrade to meet future residential demand.	crossings, traffic calming devices and signage, wildlife signage and habitat protection measures, and support the development/upgrade of general amenities to the Greenwich and Northwood communities.
10.11 Flooding (SEAR 13)	91	Detailed building design (eg ESD) and engineering design is warranted to mitigate and recycle significant/severe stormwater and runoff events.	Rainwater/Stormwater runoff is likely, and will directly impact on the riparian areas associated with the site, local residents and the Gore Hill reserve. The harvesting and recycling of stormwater for site and local community applications requires investigation and direction. There appears to be a loss of opportunity that has not been articulated in the EIS, especially involving the management and exploitation of stormwater events.
10.12 Bushfire (SEAR 14)	91	Design is unclear about special building design, building materials, vertical gardens, irrigation and fire management that contribute to preventing or controlling the spread of fire.	Recognised bushfire zone. Landscape plant types recognised for low combustion. Need to clarify building materials and whether vertical gardens and irrigation systems can be installed to reduce the risk of fire impact.