

5/3/2019

Attention: Teresa.Gizzi@planning.nsw.gov.au
Department of NSW Planning

Proposal Name: Greenwich Hospital (SSD No. 8699) at 97-115 River Road, Greenwich

I write to object to the proposal for SSD No. 8699 for Greenwich Hospital redevelopment, incorporating residential aged care and seniors housing, based on the reasons discussed below.

Hospital Zone and Site: The Proposal for the redevelopment of Greenwich Hospital incorporating 2 towers of seniors living with 80 seniors apartments, 9 seniors living units and villas is excessive, out of scale, does not interface well with the site nor the local area.

The 2 towers and Villas are not part of the Greenwich Hospital Services and cannot be treated as hospital services. These ultimately will prevail as residential units and do not function as a hospital providing services to the public at large. These residential units do not warrant the same treatment as the rest of the site which should be strictly a hospital for the community use. It is clear looking at the site plans that the portion with the towers is out of place and character with Greenwich Hospital.

The residential units if approved will form a large dominant mass on the site overpowering the health services aspect. These residential units will deprive the community from the benefits of future health services expansion on this site in turn taking away the much needed space and even the services. In fact if these units are approved then Greenwich Hospital will be so over powered catering mainly for the senior residents of the units with much less capacity for the larger community. It is essential to remember that the purpose of this hospital is, and should remain, for the provisioning of medical services to the larger North Shore community. The hospital should continue to deliver the highest level of care with a range of unique support services. If these residential units are approved then it is very doubtful that the hospital will continue to provide high standard of services.

Any available and accessible free space on the site around the hospital should be left for the future expansion of the medical hospital and not dedicated to very tall buildings and units to few senior citizens. Additionally, in the future when there is a real requirement to expand the hospital space it will be too expensive and too late to find additional land for any expansion.

Guidelines and Principles (including SEPP): This development has the markings of a high density residential building without the necessary controls that should be in place. A site compatibility analysis and investigation should be undertaken for this development even if no SEPP is applicable to this application for such a large development with such magnitude, implications and scale.

There are several breaches with the guidelines and principles that are expected of such a development. Contrary to what has been acknowledged by the proposal / development the SEPP for aged care facility must be applied. This proposal does not have design flexibility that attempts to minimise impacts. Instead it impinges upon the locality and character of the neighbourhoods

introducing complex problems that will not be easily resolved. As such SEPP should be made applicable to this site in order to provide a better outcome for the community.

Overshadowing: The overshadowing from the more than 89 units for 7 storey buildings will be extensive, enclosing the area and impacting a broad sweep of single dwelling houses near the development. The loss of light in some areas will be considerable and permanent with the development casting a shadow over a larger area than is made public in the presented plans. Access to solar light within the complex will be restricted despite the assertions in the reports to the opposite. Sunlight will not be available and will be seriously affected during the winter solstice.

Density and Scale: This proposal is out of character with surrounding streets as it has disproportionate height and introduces excessive density to the locality.

The 2 high buildings with 89 units will result in permanent excessive bulk, height, site coverage and footprint that the site and locality cannot deal with. This development represents extreme overdevelopment as the size and scale of the development are grossly incongruent with the location and as such is out of character with its surroundings. Increased FSR will lead to unacceptable consequences to surrounding streets. The development exceeds the maximum allowable height for aged care as it will also be unsafe for senior citizens to move around in buildings that are 7 floors high.

It is also important to remember that this proposal does not exist in isolation of the rest of the local area. The proposal exists in an area along with other high density residential developments in the nearby vicinity, such as in nearby St Leonards which is only a short distance away. These high density residential developments use River Road as the main transport artery.

Also residents and patients of the proposal will use St Leonards' services i.e. sourcing the same amenity, the same infrastructure, the same electricity supply and sewerage systems, the same public transport and the same services. This SSD proposal along with the other high density towers developments in St Leonards will utilise the same source of amenity when there is insufficient capacity to cater for all these. Such services and infrastructure are not likely to be augmented or improved to a level that will compensate for all this consumption. As such this SSD proposal needs to consider the impact on amenity, services and infrastructure with other high density developments already approved in order to provide true assessment of the impacts on St Leonards and Greenwich.

Traffic, Roads, Pedestrians, Parking and Driveways: The development for 80 senior's apartments, 9 senior's living units, Villas and the increase from 50 to 150 beds on the busiest street such as River Road could NOT be supported. This development will also use streets that are unsuitable to take on more traffic. The proposal will create traffic chaos and congestion during peak hour traffic. The SSD development will also impact Greenwich Road which is congested at best of times as it is the only exit and entry to a large section of Greenwich residents and the community at large.

Currently there is considerable traffic around Greenwich Hospital. Substantial numbers of vehicles access this site during the day and night. Any additional traffic will be unmanageable and will create traffic bottleneck in and out of the hospital added to by the residential units. This proposal is particularly alarming as Greenwich Public School is nearby and will even be busiest during drop off and pickup times. This will endanger the students of Greenwich Public School. It is disappointing that

this development has ignored the impact on the school. Safety of the school children is important at Greenwich Public School who may be at risk from traffic and parking on River Road and St Vincents Road.

There will be an insurmountable number of cars for staff, visitors and services vehicles frequenting the area on daily basis and at any time of the day and night. The traffic generated from the development with a large number of additional new residents, visitors, garbage trucks, services vehicles, ambulances and more pedestrians has to be taken into consideration in the traffic assessment report; including school drop off and pickup times for Greenwich Public School across the road.

The traffic impact of the cars frequenting the complex has not been assessed correctly. The traffic impact of cars turning into the car park (particularly turning right), has not been reported accurately in the traffic assessment reports.

There will also be a large portion of the total traffic generated by the other developments in St Leonards that should be factored into the assessment reports. The cumulative traffic assessment should not ignore the new units recently built or in the process of being built from nearby developments that will use River Road as a main road for St Leonards.

There will also be a dangerous outflow/inflow to and from River Road that will create more congestion and dangerous junctions. Pedestrian flow will further create more conflict.

There is no adequate car parking for the number of staff, visitors and service cars for such a facility. Off street parking is scarce in this area. This development will bring more traffic, more cars and more pedestrians which will place more demand on off street parking.

The traffic assessment did not take into consideration that:

- The background traffic growth rate for the traffic assessment report is based on a very low percentage that has been superseded due to the recent increase in residential developments.
- The cumulative effect of numerous recent developments that are approved or in the process of being approved that will feed into River Road in the near future.
- Parking on weekdays to access this site is a challenge at best and there is a need to add more onsite parking as the streets will not cope.
- The traffic flow around Greenwich Road and feeding into River Road will be much worst while there will be an impact on the safety and wellbeing for residents and students of Greenwich Public school.

If this development is approved then more cars will be on the streets rendering it problematic for RMS and will not be able to resolve.

Open and Green Space: This development does not have appropriate green space, trees and open space to cater for the residents that will live at that site. Instead this development will have to rely on existing open space in the locality that is over exhausted.

In fact there are several trees that will be removed for the expansion. The proposed landscaping will not be adequate to compensate for the permanent excessive bulk, size, height, site coverage and

footprint that the area has to settle for. Some minor plants and planters will not be sufficient to make up for the loss.

Non Compliance: There are several areas of non-compliance for this development. Having some additional beds does not make up for the breaches, bulk and loss of amenity. There is a non-compliance with the height, density ratio and footprint. There is also non-compliance with the planning guidelines to the extent that the development needs to be reassessed. If all this is added together the breaches will amount to major contraventions. The cumulative number of breaches is excessive to the extent that this development should be refused.

Transition, Set Backs and Separations: It is important that transitions and setbacks are made much more generous due to the impact of the height, scale and footprint. Having minimal setback from the boundaries for such tall buildings and from the leading edge of the buildings is insufficient to create a good outcome. As such all buildings need to have more generous setbacks, up to 10 times than the proposed in order to ensure that the development is not an over development in the site.

Environmental Concerns: This development will have large quantities of concrete, high walls and suffer from the lack of sufficient natural vegetation. Little sunlight, improper ventilation, lack of trees, inadequate landscaping and little open space will impact the environment and the local community. Also this development will not sit well in this environment especially as senior citizens require more services and amenity than expected and will be consuming more services and infrastructure.

Heritage – Pallister House:

Pallister House is an important heritage item for the area that needs to be safeguarded and truly preserved as is, in its own setting. Pallister is a late Victorian House that dominates a large part of the site with surrounding grounds and trees. Its current setting and present context provides the special character and significance. The significance of Pallister House is inherent in its design, physical location, its associated landscape and setting. None of these elements should be altered, reformed or transformed as any variation will misrepresent this valuable piece of heritage. The removal of more than 50 trees will further violate the surroundings and setting of Pallister House steering it ever so slowly into less significance, less heritage value, less historical setting that within few years Pallister House will lose its substance and grandeur.

The development on the site:

- further impact its immediate setting;
- does not have an acceptable heritage impact on Pallister House;
- will encroach on Pallister House; and
- alters the context of Pallister House so it cannot be appreciated as a former substantial Victorian residence important for the Lower North Shore history.

Community Opposition and Outcomes: It is not a good trade-off for the community to have oversized tall buildings on this site in return for a slightly bigger hospital and some additional beds. The 2 high 7 storey buildings, villas and larger hospital will remain for the rest of time consuming amenity and creating traffic with little benefit to the residents and the community.

There has been mounting community opposition to this development. It is obvious that the community has several issues with this proposal. As such more stringent assessments on traffic, sewage, electricity, facilities, noise, bulk, scale, height, transition, open space, heritage, green space, setbacks and shadowing should be provided and the plans reassessed.

Conclusion: The Greenwich Hospital site is meant to be a dedicated area for health services for the use as a highest level of care catering for any needed future expansion.

The impact on local residents will be immeasurable and the consequences have not been considered thoroughly. This development is not compatible with the area or the site. The community has not been consulted sufficiently. The conduct in which this development has been dealt with throughout the process undermines the faith of the community and puts a shadow over this proposal.

This development has substantial and significant numbers of breaches and compromises which are serious enough to warrant refusal or at a minimum major amendments to the proposal for the 2 high towers.

This development must be assessed in light of community concerns despite being an SSD and should be rejected based on the above reasons.

Yours sincerely

