

  
17 March 2019

## **SUBMISSION FOR STAGED REDEVELOPMENT OF GREENWICH HOSPITAL SSD 17\_8699**

I wish to make the following objections to the proposed redevelopment of Greenwich Hospital:

### **1. Inappropriate Bulk and Scale**

The bulk and scale is not in keeping with the residential nature of development along River Road. The building height information indicated on the architectural plans and in the Statement of Environmental Effects (SEE) is unhelpful, as ground level RLs are not clearly indicated. This means that, although top of building levels are shown, it is not easy to appreciate how high these buildings are from adjacent ground levels. The Senior Living Apartments appear to be between 15 and 20 m high, but are set back only 5 m from River Road. The main hospital is at least 30m high, which is significant for an area where the general building height is less than 8m. As a result, the statement in Part 10.1 of the SEE that the development protects and enhances the amenity of the area seems far-fetched.

The development will also have an adverse impact on the amenity of properties in the surrounding area, many of which, due to the sloping topography from the ridge at the Pacific Highway down to the water line of Sydney Harbour, overlook this site, or are overlooked by it. Instead of indicating these views, the photomontages provided as examples in the SEE have been chosen to show the development from points which are at similar level and from a relatively long distance. There is no 'before and after' image, to indicate what views have been lost.

### **2. Inappropriate Location Of Large Scale Health Services And Seniors Living**

In a planning sense this site, in spite of it being the current location of a small scale health facility, is not well suited for a large health services and seniors living development for the following reasons:

- the site includes Lot 4 of DP 584287, a heritage property consisting of not only a large Victorian residence (Pallister) but also heritage landscape elements such as its surrounding gardens, views, bridle path and other aspects of its curtilage.
- the site includes land that is indicated on the Lane Cove LEP mapping as riparian land. Although Figure 30 of the SEE, again unhelpfully, does not indicate the location of the proposed buildings, it does appear that it includes that part of the site where the Senior Living Apartments are located. I note that Part 4 Div 2 Cl 33(g) of the SEPP (Housing for Seniors or People with a Disability) 2004 prohibits buildings constructed in a riparian zone.
- the site includes bushfire prone land. Although the owner can mitigate this, the site does include remnant bushland adjacent to the Gore Creek Reserve that is protected. This means that it will not be possible to create a vegetation buffer as would typically be advised by the RFS for a land use of this kind.

### **3. Insufficient Consideration Of The Heritage Site**

Given that Pallister, including its curtilage, is a heritage-listed property, the assessment of the heritage nature of this property is inadequate. Although not registered on the NSW State Heritage Register, Lane Cove Council does consider the heritage of this site to be of state significance. In particular, three key aspects need further attention.

Firstly, the Statement of Heritage Impact notes that a suitably qualified heritage landscape consultant was not commissioned to review the development referring only to a recommendation that one be involved at a later stage to detail and specify plants, pavings etc. The Heritage Listing includes the garden surroundings of the full extent of L-shaped lot (Lot 4 of DP 584287) that forms part of the curtilage of Pallister. The grassed slope running down to St Vincent's and River Road is an important part of these surroundings. A suitably qualified heritage landscape consultant should have been appointed to determine the importance of this aspect of the heritage listed property and, most importantly, to advise on any proposed changes, including the removal of any trees or the siting of any new buildings.

Secondly, the proposal locates a 25-30m high modern commercial building within metres of the heritage-listed dwelling. This property should be appreciated and interpreted as a significant Victorian residence, however this scale would be lost as a result of it being dwarfed by the new buildings.

Thirdly, the Statement of Heritage Impact provides very little evidence of the appropriateness of siting Senior Living Villas on the part of site that has a Heritage Listing and has to date remained relatively untouched by the existing hospital. The location of the Senior Living Villas will clearly have an adverse impact on the heritage curtilage because they require the felling of numerous trees, many of which form the main view from the front verandah of Pallister. The SEE argues that these Villas will sit "under the canopy", however it is very possible that bushfire regulations will lead to the removal of any trees in close proximity to these Villas.

### **4. Change of Site Use**

There is an obvious determination on the part of the owner, Hammondcare, to insert seniors living and aged care onto the site of what is currently a specialist hospital providing none of these facilities. The split of capital costs for the development (\$72m for the hospital and health facilities and \$69 million for the Seniors Living Units) would indicate that the site use will be equal for health care infrastructure and residential, which is not the case with the current site use.

Although there may be some crossover, it is not a given that the two uses will necessarily assist each other, as most of the patients of the current Greenwich Hospital are short term (partly) geriatric patients referred by other hospitals. In fact, the location of residential dwellings in close proximity to a 24 hour hospital facility where there will be noise and vehicle movements at all hours seems to be the most unattractive feature of those dwellings.

There is no provision for addition local services for these new residents, which may have been required if approval for the development had been sought as part of a multi-residential development application through Lane Cove Council.

## 5. Failure to meet Design Principles of the SEPP (Housing for Seniors or People with a Disability) 2004

Part 3 Division 2 (Design Principles) of the SEPP (Housing for Seniors or People with a Disability) 2004 requires that the proposed development:

- recognise the desirable elements of the location's current character so that new buildings contribute to the quality and identity of the area. This proposal **does not comply** as the Seniors Living Apartments are out of scale with the area's current character, which is typified by single and double storey single-family dwellings.
- retain, complement and sensitively harmonise with any heritage conservation areas in the vicinity. This proposal **does not comply** as the Seniors Living Apartments and Seniors Villas interfere with the curtilage, including views and existing vegetation, of the heritage dwelling and, in the case of the Apartments, are taller and bulkier than the heritage dwelling, and therefore visually more dominant.
- maintain reasonable neighbourhood amenity and appropriate residential character by providing building setbacks to reduce bulk and overshadowing and adopting building heights at the street frontage that are compatible in scale with adjacent development. This proposal **does not comply** as the setback of the Seniors Living Apartments is only 5m from the front boundary on River Road, in spite of their bulk and 5 storey height, in comparison to the max 2 storey dwellings immediately adjacent. Whilst the Seniors Living Apartments are set back from the side boundary to allow for an access road, this by no means minimises the overwhelming appearance of these buildings.
- be designed so that no building is constructed in a riparian zone. This proposal **does not appear to comply** as Seniors Living Apartments appear to be located within, or very close to, the riparian zone indicated on the Lane Cove Council Local Environmental Plan 2009 Riparian Land Map. Further clarification of the location of buildings in relation to the riparian zone outline should be provided.

In summary, my recommendations would be:

1. to remove the seniors residential accommodation from the proposal and retain the existing use being health care infrastructure;
2. to reduce the bulk and scale of the proposed hospital building, in particular as it relates to the heritage listed house on the site, as well as the surrounding residential nature of Greenwich;
3. to retain the remnant landscape surroundings and vistas of Pallister, and protect the house and relevant buildings which are the subject to the heritage listing.
4. to nominate Pallister and its associated landscaped surroundings and curtilage for State Heritage Listing.

Yours faithfully

