

11 March 2019

Secretary
NSW Department of Planning & Environment
DPO Box 39 Sydney NSW 2000

Dear Sir/Madam,

RE: State Significant Development – Greenwich Hospital, 97 – 115 River Road, Greenwich

We reside at [REDACTED] River Rd Greenwich, directly adjacent to Greenwich Hospital. We have sort advice regarding the impact of the proposed development. This advice forms the basis of our submission.

This current Proposal (SSD 17-8699) has several elements that adversely affect us, the community and neighbouring suburbs. Currently, we and our neighbours have a positive relationship with the hospital and its 24 hour 7 day a week operations without complaint. It is concerning that the proposed development has not taken into consideration the hospital's adjacent long-term residents.

Please see attached our submission to the Secretary of the Department of Planning & Environment with constructive comments on the above Concept Proposal on exhibition with the Department. After consideration of the current Proposal, our submission is overall supportive of an upgrade and increase (in some form) in the aged care services for Greenwich Hospital with several objections to this Concept Proposal. A summary of these is listed below -

- The planned living apartments are clearly outside of the primary function as a critical asset aged care/palliative care facility. The living apartments are more than 50% of the proposed new plans and would prevent expansion of the aged care facility as future needs arose.
- The bulk, scale and density of the proposal is disproportionate to the surrounding urban context. The siting of the development heavily impacts (reduce sunlight and privacy) our house and other residents west of the site.
- Widening of the west road entry and retaining wall directs increase site traffic close to our property and removes the current garden buffer
- We note the removal of a significant number of trees along the front and west side of the property resulting in i) reduced privacy with exposure to hospital traffic and residents in the proposed buildings along-side our property 2. Increase traffic noise
- There are current issues with water run off along the west boundary that have not been addressed in the proposal. The impact on water run off with removal of the trees along the west side also needs to be assessed.
- The significant increase in (100%) traffic outside a large and expanding Primary School and a main thoroughfare from surrounding districts to North Sydney/CBD will contribute to congestion and noise

In our view, this proposal seeks to exploit the State Significant Development status it enjoys and the lack of existing town planning controls on the site under the Special Purpose zoning to the detriment of the community. The review of the Environmental Impact Statement (EIS) is constructive and should be informative to the Department of Planning.

Find attached specific details of issues and challenges that impact to our property. We ask that the Department of Planning give serious consideration to our submission in reviewing the development proposal for Greenwich Hospital.

Regards

[Redacted signature block]

Copy to:

The Honourable Anthony Roberts MP – Member for Lane Cove
Ms Pam Palmer, representative for East Ward, Lane Cove Council

FORMAL SUBMISSION

[Redacted line]

RE: State Significant Development – Greenwich Hospital, 97 – 115 River Road, Greenwich

Issues with proposal as exhibited by Department of Planning NSW:

1. Height of the proposed seniors living apartment buildings.

- The current planning controls for the site do not have height limits and the 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.

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. 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.

5. 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 [REDACTED] 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.

6. 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.

7. 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.

8. 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.

9. 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.

