

9th March 2019

RE: OBJECTION TO REDEVELOPMENT OF GREENWICH HOSPITAL (CONCEPT PROPOSAL) 97-115 RIVER ROAD, GREENWICH (SSD 8699). APPLICATION NO SSD 8699

I am writing in regards to the above development application as the owner and resident of Gore Street, Greenwich. My property is located directly to the south and shares a common boundary with the subject site, and currently maintains a two storey residential detached dwelling, attached garage and swimming pool to the rear.

My principal concerns with the proposed development are

1. seniors living villas on SP2-Health Services Facility, SP2 Infrastructure zoned land,
2. seniors living villas impacts on the heritage curtilage of Pallister House,
3. significant omission in the Archaeological and Impact Statement prepared by GML Heritage,
4. seniors living villas on areas of high impact & archaeological potential,
5. the removal of significant vegetation, and loss of green zone,
6. unacceptable bulk and scale of villas and consequently unnecessary overlooking impacts,
7. access Road at St Vincents Road
8. potential safety impacts of increased traffic flow

I would like to begin by stating that I am not opposed to re-development of Greenwich Hospital. However, the proposed seniors living villas concept proposal is not acceptable. This is further discussed in the body of my comments below.

1. Senior living villas on LEP SP2 Health Services Facility Infrastructure Zoned land

The hospital is zoned a SP2-Health Services Facility Infrastructure Zone. State Environmental Planning Policy (Infrastructure) 2007 defines a health services facility as a facility used to provide medical or other services relating to the maintenance or improvement of the health, or the restoration to health, of persons or the prevention of disease in or treatment of injury to persons. Similarly the Lane Cove Local Environment Plan (LEP) 2009 specifies that SP2 zoned land objectives are to (1) provide for infrastructure and related uses and (2) to prevent development that is not compatible with or that may detract from the provision of infrastructure. The proposed seniors villas are for residential purposes only, they are not health services facilities nor health infrastructure.

Furthermore, building seniors living residential housing on LEP SP2 Zoned land detracts from the future use of the land for real hospital facilities in the future, essentially locking up precious land that should be used to build future expanded hospital and health services.

Senior living villas are not health services facility nor health services infrastructure. We object to the proposed senior living villas, as they are not compliant with zoning law.

2. Heritage curtilage of Pallister House desecrated by proposed residential seniors living villas

The proposal is to build senior living villas at Lot 4, DP 584287, an area that is Heritage listed in both the State Heritage Register and LEP 2009 item number I118. The heritage item is not just Pallister House, but

the surrounding landscape. The Statement of Heritage Significance states *"It is the best surviving example of a late Victorian gentleman's villa and **remnant garden setting**"* and the heritage item description states *"Below the driveway on the eastern side the land dropped away and contained caves and grottoes...Below the gardens on the southern side of the house, stone walls and paths meandered through the bushland."* This eastern & southern side is the location where senior living villas are proposed. **Residential seniors housing should not be built on state and local heritage listed curtilage of Pallister House.**

The prepared Statement of Heritage Impact report prepared by NBS Architecture focuses on Pallister house and the views FROM Pallister house. Those views are only experienced by hospital staff, as the house is not open to the public. It is indeed the whole Lot 4 with the heritage restrictions, not just Pallister house. The Heritage Impact report by NBS Architecture woefully fails to consider the rights, access, amenity and surrounds of the heritage listed curtilage garden which every citizen of NSW has a right to enjoy looking at from outside the Hospital grounds. And by proposing to cut down 50+ trees, the heritage landscape will be changed significantly. The heritage order must protect all the trees (regardless of whether they are native or exotic) that are currently visible from Pallister House. This is the context in which the heritage listed Pallister house is intended to be viewed.

Respect and retain the heritage order on Lot 4 and do not allow residential seniors villas on heritage listed land.

3. Significant omission in the Archaeological and Impact Statement prepared by GML Heritage

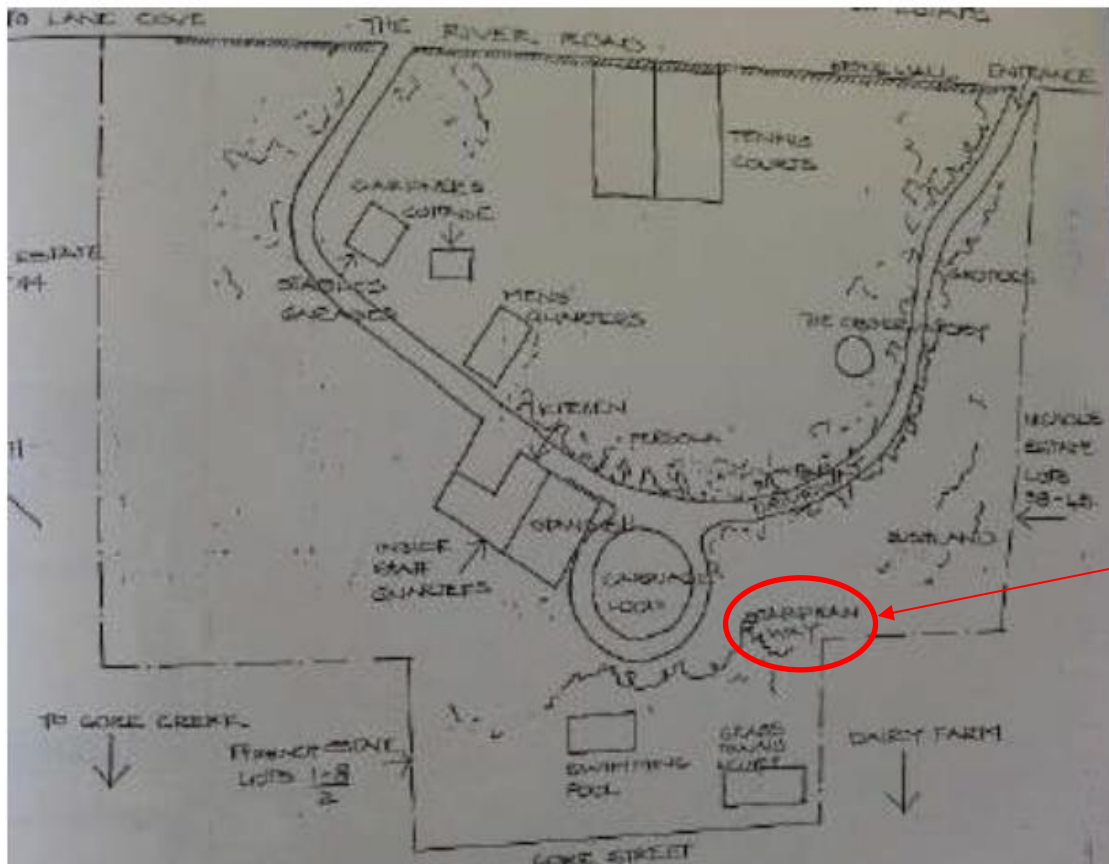
The tendered Archaeological and Impact Statement prepared by GML Heritage has a significant omission. It fails to document a historic man-made and hand carved dry sandstone wall that extends for 15+ metres in the precise location of proposed seniors villas (southern villas V6 and southern villas parking). The GML report provides Figure 3.19 which is not an accurate reflection of the stone wall that exists.

Pictured below here (taken 7th March 2019) is the dry stone wall GML Heritage failed to find. Yes it is overgrown but nevertheless clearly visible as a 0.4 – 0.6 metre high historic stone structure within the Pallister House heritage curtilage Lot 4.



Picture of dry stone wall omitted from GML Heritage Archaeological and Impact Statement report.

The precise location of this overgrown but significant dry sandstone wall is on the south eastern side of Pallister House, and is in the historic “Tarpeian Way” labelled in the below historic map c1917.



“Tarpeian Way”
here is the
location of the 15-
metre dry
sandstone wall
omitted from
concept proposal.

Reconstruction showing the layout of Pallister House and Grounds c1917. (Source: Macdonald, ST, ‘Standish’, unpublished B. Arch thesis submitted to the University of Sydney, 1985)

The Tarpeian Way is named and described in the Heritage listing of the Pallister House site, and I quote *“Below the gardens on the southern side of the house, stone walls and paths meandered through the bushland. The steps that led down to the lower garden, tennis court and swimming pool were referred to as Tarpeian Way. The grass tennis court and swimming pool were constructed on the 8 lots fronting Gore Street, purchased in 1896.”*

So the heritage statement clearly states there are historic stone walls dating back to 1896 in this very location. Yet the GML Heritage Archaeological and Impact Statement professionals appear to have been unable to find them. Give this omission, the overall completeness of the report is thrown into question and it is recommended an additional independent and thorough Heritage Archaeological report be completed. It is further noted that the wall in question was included in the surveyors and arborists report by Redgum horticulturalist.

We argue that the sliver of land in the Lot 4 curtilage that connects the south eastern corner of Pallister House to St Vincent Road must be protected for its heritage value and historic significance as the interface between Pallister House and the Tarpeian Way. Thus proposed Southern Villas V1, V2, V4, V5,

V6 (which as noted above are also not permitted based on the zoning of the land) should not be permitted to be built on this historical tract of heritage curtilage land. Furthermore, this same area of land contains large rock formations and sandstone structures that are 3-4 metre high rock outcrops. The proposed Southern Villas are far too close to these significant heritage listed rock formations and must be disallowed.

Respect and retain the heritage order on Lot 4 and do not allow residential seniors villas on heritage listed land – particularly based on an incomplete Heritage report.

4. Seniors living villas on land with high Aboriginal archaeological potential,

Proposed seniors housing villas, specifically Southern Villas V1, V2, V3, V4, V5, V6, V7, V8 and associated southern villas parking are proposed on land identified as having high Aboriginal archaeological potential. For this reason alone, they should be disallowed.

5. Destruction of natural habitat & felling of 50+ trees

Do not destroy this important green zone and bushland corridor that connects to the Gore Creek riparian land. We object to the removal or trimming of any trees in the Pallister House heritage curtilage Lot 4 – especially any tree visible from Pallister House. The loss of 50+ trees would be devastating to local flora & fauna. There are families of water dragons, kookaburras, blue tongue lizards, and an enormous amount of other native wildlife that all live in that heritage land.

Coral tree number 85, while it may be an exotic species, is within very close proximity to Pallister House and is part of the European gardens of Pallister thus should be retained as heritage and not cut down.

The Pallister house gardens are not only heritage listed, but they are a beautiful and important part of the Greenwich environment. They must be protected.

6. Unacceptable bulk and scale of villas with pillars and consequently unnecessary overlooking impacts.

Seniors housing Villas (specifically Southern Villas parking and V6) are proposed large bulky built up structure on high pylons. They will cause shadowing and overlooking of our backyard. We have a right to assume that zoning laws will be enforced, and that heritage listed gardens and property will be respected. The fact that there may be a commercial benefit from building seniors housing is completely inadequate as a reason to ignore established zoning and established heritage protections.

7. Access Road at St Vincents Road

The current access road joining Greenwich Hospital grounds to St Vincents Road was built with a promise to the residents that it will be used only as an emergency. Today it is used by all staff to bypass the traffic deadlocks at River Road during peak time. The proposed re-development will generate significantly more traffic on that access road.

That gate should be retained as a timed gate that is locked on weekends and outside of the hours of 7am – 7pm.

9. Potential safety impacts of increased traffic flow

It is noted that the existing hospital sits on a plot of land directly opposite Greenwich Public School, and as such there are an enormous number of school-age children who necessarily walk around the perimeter of the hospital on their way to and from school each day. Any addition to the traffic load that is currently in place will introduce safety risks to these students. It is noted that none of the entries to Greenwich Hospital are designed for high volumes of traffic to co-exist with a large number of school children. The introduction of residential seniors accommodation on the block will further magnify this impact.

In summary, this proposed development should be declined in its current form, and heritage land and trees must be protected.