

30th 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 adjoins and shares a common boundary with the south eastern corner of the hospital site, and currently maintains a two storey residential detached dwelling. My home is one of the most highly affected homes by virtue of its proximity to proposed seniors living villas (specifically southern villas V6 and southern villas parking).

My principal concerns with the proposed development are

- A. The proposed seniors living residential villas causing loss of amenity due to reductions in visual privacy and visual intrusion of my home and backyard;
- B. removal of 50 % of trees on the Greenwich Hospital overall site;
- C. consequential loss of a buffer zone which has existed between the hospital and my property;
- D. destruction of the heritage significance of the heritage item by development of the curtilage of the building where no need has been demonstrated;
- E. increased traffic onto and off the site;
- F. change to the existing character of this precinct and to the adjoining properties; and
- G. the significant proportion of residential apartments & villas are changing this site from a principal use hospital to a principal use residential will result in inability to meet SP2 Infrastructure health services facility zone.

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.

A. Senior living villas causing loss of amenity due to loss of visual privacy, and visual intrusion

The proposed seniors living villas (specifically V6 and villas parking) will cause consequential loss of visual privacy to my home.

- The V6 villa is proposed to be built up on podiums. Due to the topography of the land, and my home being on the low side of my steep block of land – the residential occupants of proposed villa V6 will be able to see directly into my children's bedrooms, two bathrooms, and overlook my entire backyard.
- The land these seniors villas are proposed to be built upon is zoned Infrastructure SP2 Health Services, AND within that is heritage item Lot 4 (DP 584287) – and I have a reasonable expectation that the legal zoning and heritage land protections will be upheld and enforced. Residential services are clearly **not** "Health Services".

B. removal of 50 % of trees on the Greenwich Hospital overall site

The proposed removal of 50 percent of the trees on the site, many of them in Heritage item lot 4, is unacceptable.

- If approved in its current form and layout, fine detailing of footprints, services and drainage would likely require the destruction of even further vegetation. This loss of significant mature trees, many of them in Heritage item lot 4, is unacceptable.
- The 2018 Greater Sydney Commission, North District Plan planning priority N19 calls upon State and local authorities to increase urban tree canopy cover and facilitate Green grid connections. The Plan sets a target to increase urban tree canopy cover across Greater Sydney to 40 percent. This proposed Greenwich Hospital development proposes removal of more than half the tree canopy which is inconsistent with the Plan.

C. loss of a buffer zone which has existed between the hospital and my adjoining property

The nine (9) villas proposed on the eastern side of Pallister would cause the current buffer between the site and my home to be lost, to provide within a sensitive part of the site, a gain of nine (9) residential villas. No detailed justification has been provided as to why this sensitive area of the site should be developed. Furthermore due to the steep topography of the land my property will be adversely affected by the loss of natural drainage patterns.

D. destruction of the heritage significance of the heritage item by development of the curtilage of the building where no need has been demonstrated;

The heritage item is the entire lot Lot 4, DP 584287 which contains Pallister House and its curtilage. The current proposal has villas being built entirely within the curtilage of the building. The building on this heritage lot, is completely unnecessary. Senior Living Villas have no bearing on the ability of the site to operate as an effective Health facility. The loss of the heritage environment, for no clear gain, is unacceptable.

The description of the heritage listed physical site includes pathways and sandstone walls within the bushland which surrounds the building. Some of these walls are evident at the rear of properties in Gore Street (but on the subject site) and appear to be within the area of the development site for the Seniors Living Villas. As the applicant has not demonstrated a necessity to provide these villas as a crucial element of the development, we would advise that the Department require the preservation of the full heritage area of Lot 4. The proposal diminishes the spaciousness around Palister House which contributes to its sense of grandeur within the Hospital grounds. The Heritage Item is not just the built environment but the garden areas too.

E. increased traffic onto and off the site

Currently traffic does use the internal road system of the Greenwich Hospital as an alternative to using St Vincents Road and River Road intersection. The proposed use of the site as a 'campus style' development with both hospital and other health services uses plus independent residential living would see a fundamental change in traffic on the site with traffic being generated from the site at all hours due to the movements of the residents and visitors. While it may be possible to restrict traffic movements into and around the site of a large infrastructure facility, it is not possible to do the same in regard to private residents and their visitors and deliveries. The risk this

introduces in the context of the nearby school and more broadly with young children throughout neighbouring areas is not acceptable.

F. change to the existing character of this precinct and to adjoining properties

Currently Greenwich Hospital site is nestled into a residential setting; surrounded by R2-zoned residential dwellings and riparian bushland on three of its four boundaries. The fourth boundary to the north of the site is River Road. It has not been demonstrated within the proposal that it would safeguard the character of this neighbourhood. The local context of the site and the proposal, sitting within a low density neighbourhood, has not been adequately examined within the documentation to the extent that The Department could be satisfied that the proposal will be a good neighbourhood fit. There has been a failure to understand the defining characteristics of the immediate neighbourhood and how the proposed residential accommodation will positively contribute to, retain and reinforce this character.

G. the significant proportion of residential apartments & villas will change this site from a principal use hospital to a principal use residential, and will result in inability to meet SP2 Infrastructure health services facility zone.

Under the provisions of the SEPP Seniors Living, residential accommodation for Seniors Living is not permissible on any sites with a SP2 Infrastructure zoning with the one exception of sites zoned as 'hospital' (Health Services Facility). The subject site is zoned as SP2 Infrastructure Health Services Facility. While the provisions of the SEPP Seniors Living permit the proposed use of residential accommodation, it is my opinion that the intention of the SP2 Infrastructure zone – Health Services Facility would be diluted to such an extent that the principal use of the site is no longer a hospital. The documentation indicates that the cost of the works is evenly split 50-50 across the \$141 million proposed development (\$72 million and \$69 million) across the two (2) proposed uses of hospital and residential accommodation. Further, the proposed floor space calculations indicate that more than 50% of the proposed GFA would be allocated to the residential accommodation component of the overall redevelopment of the site. In addition, the site cover of the proposed residential component of this development including internal roadways which are required to service the apartments is in excess of 50% of the site.

In conclusion, I strongly object to the applicant proposing residential apartments & villas on land that should be used for hospital infrastructure. The proposed residential apartments & villas on the subject site accounts for approximately 50% of the budget allocation and more than 50% of the proposed gross floor area and site cover and is disproportionate to what is envisaged by the aims and provisions of the Seniors Living SEPP in relation to accommodation on sites also used for hospital purposes. The proposal is for 150 beds within the hospital building. Based upon two (2) residents in each apartment or villa, the residential population is 196 residents. This also represents more than 50% of the site being used for residential uses.

Building residential villas in heritage & hospital land is also a gross misuse of public land. As I understand it, this Greenwich Hospital site is in fact owned by the NSW Department of Health, and HammondCare (the applications) are merely leaseholders, if that is indeed correct then this attempt to build residential apartments and villas on NSW Department of Health land is a gross misuse of public land that should be used for purely hospital purposes. Furthermore the land should be preserved for the future expansion of the hospital in the medium and long term to serve the population of NSW.