

Re: Objection-Redevelopment of Greenwich Hospital (Concept Proposal)SSD17-8699

Please register my objections and concerns regarding the above proposal.

Objection to the Concept Itself, of placing Seniors Living on this site and on Hospital-zoned land

This Hospital-zoned land is needed to remain used for Hospitals and the ordinarily incidental or ancillary development that is part of a Hospital. Population growth has already seen hospitals struggling to provide for the current population. Nearby, significant population growth in the tens of thousands is occurring and more growth will occur, increasing demand for essential genuine health services. Seniors Living is not a genuine health service, and as such does not qualify to be on this site. It comprises over 50% of the land area, floor space, and approximately (if not in ultimately more than) 50% of the costs.

The proponent has attempted to redefine Seniors Living as part of a hospital, and has sprinkled its message of “integrated”, “ancillary”, “associated”, “continuum “, “hospital style campus” and the like, liberally throughout the documents. But, Seniors Living is not a hospital, nor incidental/ancillary to it, and does not need to be part of a Hospital, and can go elsewhere. The Common Facilities listed under 4.3.5 in EIS are frequently found in hotels, resorts, and other large residential developments, including those which are stand-alone Seniors Living developments. The Seniors Living is not “sufficiently related” to the SSD.

A Seniors Living development is particularly unsuited to this site, which is on bushfire-prone land, adjacent to environmentally-sensitive E2 land and surrounded by R2 residential. It has poor public transport service, obviously-difficult walking and cycling terrain, a highly- trafficked main road, remoteness from shops and most community facilities which mostly are a 1000m or more distance away, via steep gradients. Multi-unit dwelling is not sympathetic to the desired character and feel of the surrounding areas. Given the already-high and wide envelope proposed, the height and bulk can get greater if the proponent chooses, under the SEPP vertical villages clause.

Objection on Grounds of Visual impact of Excessive Bulk, Scale and Height, and inadequate setbacks to River Rd and edge of Gore Creek valley

The south-western 7 storey Independent Living Seniors apartment block has been placed in a prominent position very close to the edge of the steep valley side, with views over Gore Creek Reserve and Lane Cove River, to the harbour, as emphasised in the EIS Site Analysis plan. Some edge or buffer trees are even removed, and the new 8m wide internal through road prevents substantial planting by placing a road where, otherwise, deep soil could support substantial tree growth. Combined with the doubtless desire of the proponent to maximise financial return through opening up views to the ILU’s clientele, the result is a highly visible, very large building mass, which will be highly dominant and prominent for a large area of the outlook from numerous properties across the valley, and dominate the skyline of Northwood, Gore Creek Reserve and Oval, and that of parts of Greenwich.

Landscape proposal for Zone C also indicate no desire to provide vegetation which interrupts the view from apartment residents, even at the podium level. The north-western 7 storey block is also similarly high and prominent, viewed from Fleming St Northwood, other nearby residential areas such as Osborne Park, from Greenwich Infants School, and for drivers along River Road. The EIS shows no genuine attempt to give the corollary to all this view-maximising design, by assessing the visual impact in the reverse. Its visual impact assessment on surrounding built environment is inadequate and highly misleading, with view impact photomontage locations being selected at only two places, both with many trees or parts of buildings obscuring what will be seen.

Imagine having half the cruise ship “*Viking Sky*” sitting up on the hill opposite you, 250 m away – that is akin to how the bulk and height of the two ILU blocks will appear together, to residents of Northwood, who have been almost totally disregarded by this EIS.

To fit the ILU apartments and villas into the site, the proposed hospital buildings have been crowded into a relatively small area of the total site. The high hospital building will be very dominant from River Road and surrounding areas, and would not need to be so high if the same FSR was constructed within a lower height envelope, over a broader area. Setbacks provided along River Road are not adequate, and at least 8 perimeter trees are removed, despite the EIS stating that “perimeter trees” are retained. The EIS misleading states that existing setbacks are maintained, when the reality is the current setbacks are for low-rise buildings which are on a small length of the River Rd frontage. For the houses on River Road, immediately to the west, the impact of the additional height is likely to be devastating, as they already have land lower than the hospital land. The perimeter trees seeing the hospital are nearly all to be removed, too.

Objection on Grounds of Adverse Amenity Impact and Risks and costs to Public Assets:

Sewer Main, Gore Creek Reserve, Bushwalks, Creek Walls, Playground and picnic area, Bob Campbell Oval Oval and Playground. With increasing population expansion, increasing pressure is placed on outdoor recreation areas which are shrinking in proportion to population. Increased Solid overshadowing by high building masses, leading to turf deterioration, and damage by flooding due to reduction in absorptive surface areas above, are risks which this development will exacerbate. The Oval was underwater in Nov 2018, rock walls and playground edging were washed away and the surface on the north side has remained soggy to this day. These are still under repair, in March 2019. Rock falls, falling trees are also risks which will be exacerbated by this intensive development, its siting, hard landscaping, loss of potential for deep soil areas due to underground parking.



Following 29 Nov 2018 sheet flooding of Oval, Chain-wire fence shows debris-tide line about 300mm high, and fence and stone retaining wall are washed into creek by force of direction of water escape flow.



March 2019, storm-eroded rocks lie in creekbed; stone creek wall and playground edge still need repair.

Sewer- There is an above-ground sewer main pipe line running just 10 m below, and generally parallel to, the south-west boundary of the subject site and crossing the cascades' path. Sewage from descending pipes serving presumably nearby houses and the Hospital site enter into the main. Risk of damage to this sewer main infrastructure due to uphill works, tree root invasion, 350% increase sewage inflow from rock falls, is real, and a costly, possibility. Even once damage to sewer and creek stone walls is repaired at community's cost, bushwalks were closed and areas remained for months, roped off by Sydney Water due to health hazards, and environmental damage to land and water lingers long, such as inappropriate nutrients and soil and rock mobilisation. Photos below show an incident of sewage overflow into Gore Creek on 6 June 2016; the resulting erosion and rock piles have still not been attended to.



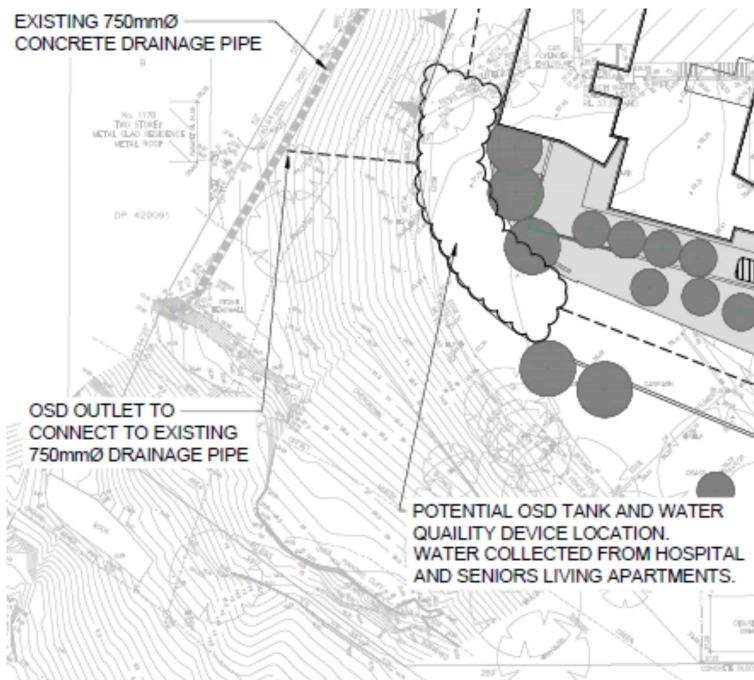
Sheet of sewage flowing into Gore Ck 6/6/2016



Sewage overflow into Gore Creek 6 Jun 2016

Objection on Grounds of Environmental damage to Bushland, Soils, Habitat, Waterways, and Stormwater Management

A natural watercourse runs through the site, diagonally beneath the current River Gum low rise building, fronting River Road, and continuing down the slope to Gore Creek, as shown on Fig 10, p9 of Heritage Impact Assessment Report, Appendix H. A "high cliff" is also shown on Fig 10. A 750 diam concrete drainage pipe, shown most clearly on Appendix I 2 Civil Engineering Plan CC140088E4-1/A as discharging its stormwater load over a 5-6 m high cliff below Stone Headwall on the subject site's "high cliff", presumably runs underground in the position where the Civil drawing shows it. Doubtless the stormwater runoff will increase, and even though some may be successfully detained in the OSD tank shown under the western part of the new through-road, the release of stormwater and surplus runoff from the road will have some adverse impacts to highly sensitive areas down the slope, which include leaning trees susceptible to any change in overland flow – whether less or more. Rocks can be pushed downwards, destabilising the landscape, and soil creep is identified as happening constantly, in the Prelim Geotechnical assessment. The Civil plan extract below shows the Rock cliff which is not on Survey, 750 diam pipe and potential OSD tank.



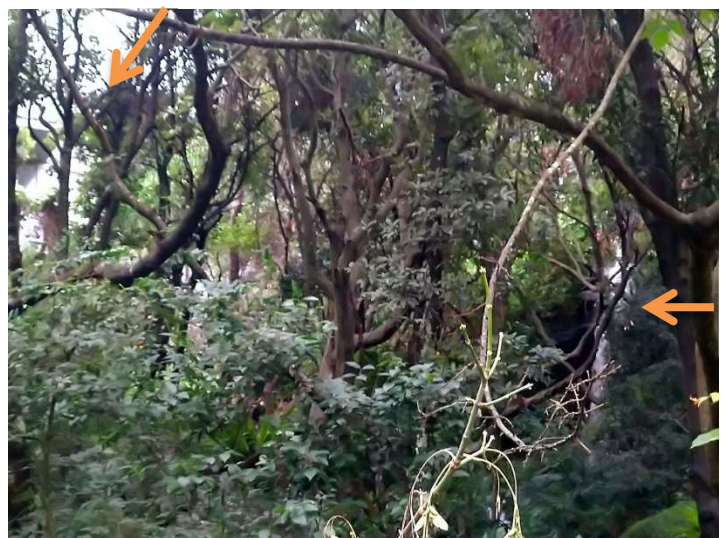
Extract of Civil Plan (not shown on Survey)

The latter report also mentions contamination of fill with asbestos, and construction work, and work in any fill area will mobilise these contaminants, construction sand and other fine particles, and debris, which will cause downhill damage. Damage will be both to the site itself, which contains quite a lot of dense shrubs and trees, and the E2 bushland and the habitat within both of these. The EIS is incorrect when it states that the development will have “negligible impacts” and on Riparian lands or E2 bushland, and that the new buildings’ locations will “minimise” direct impact on natural vegetation and habitats. And, how can “protective measures” be implemented to retain the trees below the new road, when the EIS has ignored the fact of their very existence, by not surveying them and building gabion walls and walking tracks where the trees are?

Below photos show the rock cascades below where the 750 diam pipe discharges, and the waterfall above formed by the discharge from the pipe.



Cascades into creek, after rain, from site



Orange arrow(L) shows 119? River Rd; (R) shows waterfall



(L) Part of ‘overhanging cliff’ on s-west of subject site, and (R) the oval below, as seen from the Reserve

Objection on Grounds of Bushfire Safety

The Bushfire Assessment recommends bushfire protection construction for the Seniors Living Apartments and café but this has not been applied in the costing for the project. It appears there is being given or offered an “easy way out” of the moral obligation to protect life, by arguing for a 0 degree slope rather than the actual effective steep downslope which exists, and for classing all bush vegetation on and off the site as rainforest, when it is not. Also, the bush area comes closer than is shown by the “protected vegetation” shown in Image 07. It comes to the edge of the new road and the Rest Area, which both are at the top edge of a rise of quite a steep batter or retaining formation. This influences the APZ extent.

It is questioned whether the assessment of 0 degrees slope - is valid, given that vegetation canopy covers the tops of cliff formations which are claimed to limit spread of fire from the hazard toward the building element and lives to be protected.

Under proper compliance, the 8m wide carriage new loop road is required to be a permanently open through road, not the “controlled access” which is marked on some documents, such as the Heritage Assessment when considering impact on Lot 4 Curtilage.

It is not clear in the diagram in bushfire, where is the “protected” vegetation, and what is intended for the vegetation which contains trees and shrubs below the internal road. Compare the Zone C with

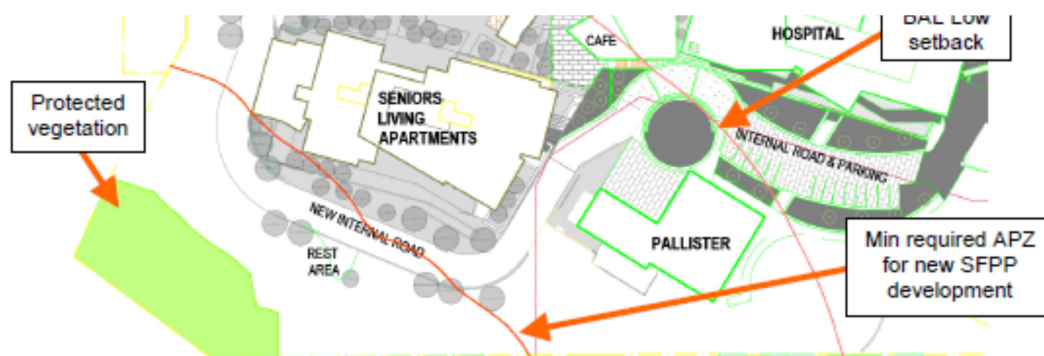
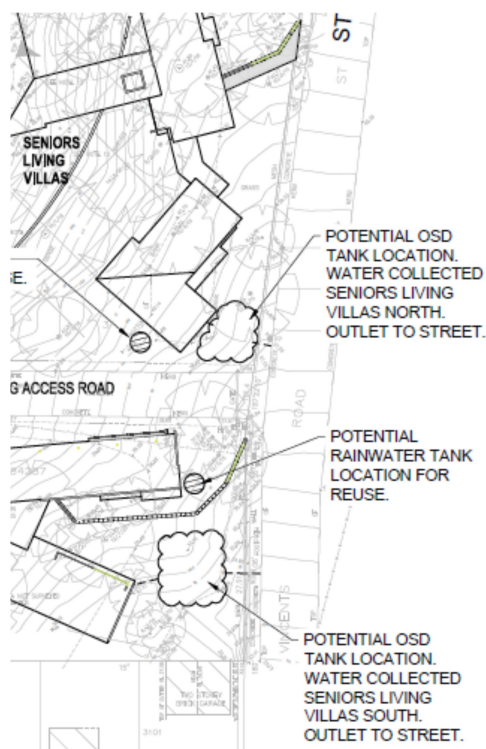


Image 07: Overlay showing protected vegetation (shaded green), minimum required APZ for new SFPP (red line) and BAL Low setback (pink line).

Objection on Grounds of Damage to State Gazetted Heritage Pallister House including Lot 4 Curtilage area

Page 18 of Heritage Assessment Report shows that the whole of the area of Pallister's Curtilage inside its Lot is gazetted under a Permanent State Heritage Conservation Order. HammondCare knew this when purchasing the land in 2008, yet now they seek to change it. Many trees are removed, the historic setting is destroyed, and retaining walls and OSD tanks are proposed in the Curtilage as shown on extract from Civil Plan, see below. The proposal is not consistent with the protection of the Curtilage as required



Objection on Grounds of Traffic and Parking adverse Impacts

The proposal will cause interruption to traffic flows on an already very busy state road. To say that it is all being carefully managed in line with RMS advice is to say that there will be adverse traffic impacts.

A left-in left out central drive, with no through way, will cause increased rat running. In Northwood this can mean vehicles traverse a highly difficult, steep acute angled corner between Arabella St and Northwood Rd. Increased operation of signals at the through road will interrupt traffic flows more often, causing greater delays due to the Doppler-like effect on vehicle speeds. More people in the ILU are expected to need cars, further adding to traffic congestion on River Rd and surrounding street networks. Estimated vehicle movements in/out at signals does not seem high enough.

Parking provided may not be adequate, should expected number of spaces not eventuate during detail design of carparks, or prove inadequate for demand. In addition, manoeuvring of service and delivery do not appear to have adequate space, and may impact parking and through traffic.

Here is an example of the current problems, from a resident of a street running off Gore Street:

Letter comment to DA56/2018 re Expansion of Greenwich Infants school, opposite hospital
"I am concerned about the loss of the onsite parking.the parking in this area is extremely tight and with the loss of onsite parking, teaching and admin staff will need to park off street. The question is where? already commuters park out any spare spaces .
in Carlotta Street parking there is terrible with commuters starting to arrive from 8am."

Safety of Infants School children who cross in front of the hospital are also impacted by traffic numbers increasing.

Errors/omissions and inconsistencies in EIS documents

Drawings and EIS have some misleading depictions or errors which give rise to an incorrect EIS.

1. Survey "THIS AREA NOT SURVEYED" extends downslope to south-west from lower (south-west) carpark to south-west boundary and beyond, to the spot levels marked along the bank area of Gore Creek

On page 4 of EIS Appendix E, Survey, 32677DT carried out on 4/2/09 by Lockley Land Title Solutions, near to the south-western boundary of 40.695, bearing of 306 .33 degrees, marked in small letters are the words "THIS AREA NOT SURVEYED". To clarify the extent of this "not surveyed" area an enquiry was made with the Survey company. The reply was that the contours shown on this site area have been 'interpolated' between the actual marked spot levels on detail pages. The .5 m interval contours are therefore not accurate but an interpolation only, between the known levels along the 'metal railing fence' and spot-levels of marked tree bases, at the top of the "dense overgrown bushes and shrubs" and the levels beside and along the creek below, with any other spot levels (eg near the concrete culvert) taken into account. This means that in this area, and generally measured perpendicular to the lines of contours, for a distance (measured on plan horizontally, not diagonally along the upslope), of:

- i) 92m – between RL36.66 SMH at top & spot level RL1.59 at creek
- ii) 58m – between RL37.65 ELP at top & spot level RL1.78 at creek
- iii) 53m – between RL37.89 at top near corner of bitumen carpark & spot level RL1.49 at creek

there is not shown full nor accurate information on the survey and all drawings produced.

There are, rock outcrops, cascades/waterfall, cliff formations, steep inclines and significant trees. The Jeffery and Katauskas Pty Ltd Geotechnical Sketch Plan Fig 1 indicates some of these features

Implications. Despite the above, the EIS has reproduced and used the "this area not surveyed " south-western steep slope Survey contours as if they are accurate, which they are not. They have been used, for example, to determine

- shadows of massing models falling on terrain and bushland - these diagrams for the 9am shadows will therefore not accurate, and
- make landscaping and other plans which include building gabiron walls, walking paths and the like
- make other observations and statements about this area
- there is inadequate investigation of the condition of the sandstone bedrock/cliffs

Interestingly, the Civil Plan does show what appears to be a comprehensive survey of the same "not surveyed " area, with many many spot levels and realistic contours, including rock formations, cliffs and some trees. It appears to accord with reality. Why was this not shown on all the other plans?

2. Misleading Misrepresentation of Height of Pallister House Roof (slate) in a multitude of drawings, appearing repeatedly eg in Heritage Report, EIS statement, Architectural Drawings, Architectural Design Statement.

By Survey: The Ridge of Pallister House is RL 59.98. The RL 49 contour on the north side passes through its north east and its north west corner, on survey plans.

This makes it 10.98 m high, along its northern side, facing the proposed new hospital building.

The Fig Tree 102 grows from ground RL49.17, and has 19m(arborist) or 20m (surveyor)estimated height. The envelope Articulation/Zone of Hospital top is RL80.0 and rises from top of a current retaining wall, also at RL49 across the driveway partly encircling the Fig Tree 102.

This makes the Hospital 31m high - about three times 10.98m the height of Pallister (slate roof) .

Yet strangely, in Heritage Assessment Fig 39 and Fig 40, due to incorrectly shown, “puffing up” of the heights of the Fig and Pallister, and omitting Articulation/Zone for Building Form Expansion on the cross-section, the Hospital appears only about twice the height of Pallister, with the Fig appearing to soften the transition. Similarly in Image 6, p29, the height differential is distorted. And what about the upper verandah floor, of Pallister? Is it also at the incorrect height? Given that the Heritage Assessment is using these incorrect images to form its expert opinions, there need to be serious doubts about the conclusions drawn. EIS commenters will be also affected by these incorrect images. f

- 3. Drawings do not sufficiently show surrounding context - such as the bushland reserve, properties below to the south and west of the site, the infant’s school opposite, Northwood homes just 150 to 250 m away, and the valley and oval to the south west , the scope of information provided to inform on the suitability of the development within the character and feel of its surrounding is highly limited. See Attachment Sectional Elevation , prepared to give an uderstanding of RLs in surrounding environment and context.
- 4. Misleading depictions in some photomontages
The footpath directly in front, on River Road, has steps, but they are not shown in EIS photomontage (below left). There are 3 + 8 + 9 steps up, then 10 down, on this footpath. Why leave off?



Figure 34: View from River Road to Entry Precinct



A man appears running in Fig 34 View, above , but there are steps in the path, as in photo above right.

5. Omissions in Cost Plan

Capital investment value has omitted certain items which appear necessary to have included: Moreover, apartments are 68, priced at a lower rate per sq m, and villas are 24.

EO for Bushfire zone construction to southern block	Excluded
Audio Visual / IT Equipment and Infrastructure	Excluded

If the excluded amounts were added and the apartments priced at a rate of then the Seniors Living component of the development would be well of 50% of the total cost.

Consultation

Consultation with general public during preparation of EIS was extremely limited, with many people remaining unaware of the proposal due to the way residents were notified – generally, only very close neighbours received advice about it, and about the Information session in Nov 2017. At that session, some misleading advice was given to some people. Probably, given the similarity of what plan shapes and building designs were displayed on the screen images, to the current EIS, much more detail was known at that stage, than was provided to attendees. The information session seemed to benefit in reverse, with the public giving feedback to the proponent, based on the rather leafy montage views and scant details available. It is doubtful that the feedback given at that time, was informed feedback. Since that time, except for what was already available on the SEARs application documents, no further consultation with the public has occurred, to general knowledge.

In summary, the concept is not suitable, the EIS is inadequate, and the proposal as shown in the EIS should be rejected.

Yours sincerely,
A Resident.

Attachments -1 - cross section; 2 - view from Northwood



Photo of a tall tree which fell over across the Gore Creek playground in Feb 2019, due to gradual rotation of the base of its leaning trunk - viewed from the top, and from the playground.