

## Redevelopment of Greenwich Hospital (Concept Proposal) SSD 17\_8699

This submission comes from the eight appointed community members who serve on Lane Cove Council's Bushland Management Advisory Committee. It is not a formal submission from that Committee, but, as a result of our common interests and concerns we will focus predominantly on issues related to biodiversity or bushland on, adjacent to, or close to the proposed development.

Before discussing the substance of the proposal we would, however like to point out that four weeks is much too short a time frame for public consultation for such significant development with voluminous documentation. This development sits in the heart of an existing community where there are other concurrent development issues, and communities require adequate notice for news of proposals to reach through the community, for community members to find voluntary time to read, absorb, think about and consult each other on those proposals. then to formulate submissions. Inadequate time is disrespectful of community interests and voluntary effort, and even Lane cove Council was significantly constrained under this timeline. While a number of community members requested extension, this was refused until the Minister expressed his support for extension. We certainly appreciate the extension of time for submission from 15 March to 5 April, but believe such proposals should be given more exhibition time in the future, as a starting point.

We also appreciate that Greenwich Hospital provides important community health services and is highly valued locally and in the health community. We do not object to redevelopment of the hospital on this site per se, rather we are concerned about a range of issues regarding the scale and nature of particular aspects of the proposal.

### Our concerns with the proposal

In summary our concerns are:

1. Permissible land use on this site where this proposal is proposing to develop a large proportion of the site for residential uses, not permitted under current zoning
2. The design that places very high blocks (6-7 stories) of Seniors Independent Living Units (ILUs) on the edge of bushland
3. The landscape impact of the seniors ILUs from any westerly direction (Northwood, including the harbour foreshore, the bush on the Northwood side, the park and oval below the development) and the almost non-existent analysis of the landscape implications of the development from this direction in the documentation
4. Construction impacts and long-term stormwater and drainage impacts on the bush below - both on the site's remnant bush buffer and the reserve downslope
5. Biodiversity impacts of the development both on-site and on the adjacent bushland
6. The treatment of other trees on site.

#### 1. Permissible land uses

The site is zoned SP2 Infrastructure Zone (health Services Facility in Lane Cove Local Environmental Plan (LEP 2009. In Lane Cove's LEP:

*health services facility* means a building or place used as a facility 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, and includes the following:

- (a) day surgeries and medical centres,
- (b) community health service facilities,
- (c) health consulting rooms,
- (d) facilities for the transport of patients, including helipads and ambulance facilities,
- (e) hospitals.

We believe this does not include residential uses such as seniors independent living apartments or villas. It would therefore seem that this aspect of the development is not a permissible use under the zoning. Given that the areas for these units and their associated outdoor areas occupy almost half the total site area, these cannot even be considered ancillary uses. These units will prevent the development on this site in the future of further genuine health and medical facilities which may be sorely needed with expanding population, and negate the purpose for which the zoning was designated.

## 2. Location of southwest seniors ILUs block

Permissible LEP uses aside, in an attempt to apparently squeeze maximum development out of this site, the design of this proposal places two large 6-7 storey buildings right on the edge of bushland. This has a range of potential adverse impacts, discussed below, and is poor design on a number of grounds given those impacts. In addition the villa units are to be constructed within the heritage curtilage of Pallister House. This is inappropriate in a heritage curtilage, and will result in the permanent loss of a small remnant of Coastal Enriched Sandstone Dry Forest (further discussed below), currently within that curtilage.

## 3. Landscape impacts from westerly directions

The seniors ILU apartment blocks will have significant landscape impacts viewed from any westerly direction, i.e. from Northwood, from many parts of Gore Creek Reserve, from Bob Campbell oval and its associated parkland, picnic areas and the Northwood foreshore. The architectural plans (Appendix B1) clearly show the height these buildings will reach well above the existing tree canopy level (Street elevation 1 - Drawing S.03, and Cross-section C - Drawing 5.04, Appendix B1). However, there are a number of conflicting statements in the documentation relating to this matter.

Clause 25 in Table 10 *Compliance with SREP(SHC) 2005* claims 'the proposal is not visible from the Sydney Harbour foreshore and will not impact on the scenic qualities of Sydney Harbour'.

This is not true and is contradicted in other parts of the documentation. The site analysis (p.17 EIS) claims views from the apartments 'through reserve to Lane Cove River and beyond' (for both blocks), which means the blocks must be able to be seen from those locations, and the river and the foreshore at Gore Creek and Northwood are part of Sydney Harbour. Furthermore the Architectural Design Statement, Appendix C, section on Topography states "*The steep slope means there is a relatively clear outlook to the mouth of the Lane Cove River. Conversely there are some clear views towards this part of the site from parts of the surrounding suburbs*". Given the height of the blocks above existing trees shown in the proponents plans as outlined above, they would be very obtrusively visible,

Clause 26 further claims:

26 Maintenance, protection and enhancement of views

The development will not adversely impact views to or from the waterfront, any public places, landmarks and heritage items. Photo montage visual analysis by Bickerton Masters Architecture, refer Appendix B, confirms that the leafy setting of the site will be maintained, and the new buildings will be substantially screened from view from residential areas and the public domain.

This is not true. As above, the seniors ILUs will have a major landscape impact on public places - Gore Creek Reserve and Bob Campbell Oval. Section 10.2 View Impacts (p76 EIS) repeats the claim of no adverse view loss, and the softening effect of vegetation. The seniors ILU blocks rise well above any neighbouring vegetation (deliberately, to enhance views from those blocks). Trees well downslope cannot soften this.

However, there are no drawings and only one poor photo montage (from 46 Upper Cliff Drive strategically located from a viewpoint with foreground trees) to demonstrate how these blocks will impact the landscape when viewed from the west. A Lane Cove resident with professional skills in this area has developed drawings using the RLs and other details provided in the project documentation and these are attached in Appendix 1. They illustrate how devastatingly obtrusive these blocks are in the local treed and

bush landscape. The lack of any such analysis by the proponent, given the level of analysis of views from River Road and St Vincents road is very deceptive and misleading.

#### 4. Construction impacts and long-term stormwater and drainage impacts

Given the steep slopes, both on the proponent's land and below into the reserve, the construction impacts on the bush below (both the on-site bush and the reserve below) of demolition of existing structures and subsequent building of a raised road and podium for the seniors ILU blocks above such a slope are likely to be considerable. These include mobilisation of soil and the deposition of sediment downslope in Gore Creek and beyond, movement downslope of larger rocks and escaped material and destruction of rock outcrops. While some of these may be able to be addressed through careful building methods and tight monitoring and enforcement of protections and protocols, we feel some damage is still likely even if all this is in place (which is rare for building sites).

While plans to deal with the increase in impervious surfaces and consequent stormwater generation have been addressed, the **loss** of water to bushland slopes has not. Carving basement carparks out of the higher ground will result in major disruption to water flow in the rock shelves and to the percolation of water downhill into the bush, potentially resulting in permanent drought conditions for that bush and its trees, resulting in eventual tree death.

#### 5. Biodiversity impacts

The EIS (p102) says the following:

##### Biodiversity

- The proposed development will have negligible impact on existing Riparian Lands or bushland areas adjoining the site; and
- Direct impacts on natural vegetation and habitats have been minimised by the location of new buildings within previously disturbed areas. Protective measures to retain trees during construction will be implemented.

Yet the Biodiversity Assessment Report (Appendix N1) lists substantial on-site impacts in the loss of almost half a hectare of Coastal Enriched Sandstone Dry Forest, PCT 1776 (within a heritage curtilage zone), the loss of foraging habit for several bat species actually recorded on site and the loss of 4 of 11 precious hollow-bearing trees (needed as wildlife nesting places and taking 70-80 years to form in trees), while the Arborist's Report (Appendix L) details many native trees for removal that are likely to be important remnants. Key local species to go are:

Sydney Blue Gum, *Eucalyptus saligna*: tree nos. 17, 27, 35 & 40

Blackbutt, *Eucalyptus pilularis*: trees 39, 176, 177 & 184.

Sydney Red Gum, *Angophora costata*: trees 38, 52, 54, 57, 63, 64, 66, 71, 72, 73, 77, 78, 163.

Red Mahogany, *Eucalyptus resinifera*: trees 53, 58

Forest She Oak, *Allocasuarina torulosa*: tree no. 74

In addition, there has been little consideration of birds in the biodiversity assessment. We would highlight the situation of the Powerful Owl, which is listed under the NSW Threatened Species Act as Vulnerable. Much work has gone into understanding the habitat and needs of this species and to take measures to ensure that it doesn't decline and move onto the threatened list. As a result, this EIS is technically able to exclude this species from consideration of impact. But they are an important species in our bushland. Normally they require a range of 400 hectares of bush to support a breeding pair and deep hollows in mature eucalypts for nesting. That there has been an increase in sightings of Powerful Owls in Lane Cove, as well as occurrence of several known breeding sites, when Lane Cove has just 98 hectares of reserve bushland is a success story in the management and restoration of that bush as well as an indication of the extent to which such species also rely on the pockets of bushland on private land to increase their available habitat and foraging ability.

Purchasing offsets which may be within 100km of the development site for the vegetation and anywhere in NSW for the animals is totally inadequate. In inner urban Lane Cove, loss of any remnant of native

vegetation is serious as there is so little and all remnants are precious as both historical records and in the provision of networked habitats and corridors. Historical records cannot be replicated by replacement planting and the local bats have so little habitat that the loss of anything they use locally may bring on a tipping point for their viability.

In addition, there has been no assessment of biodiversity and impacts in the bushland adjacent to the site in the Gore Creek Reserve. Noise and construction impacts, light shedding from the completed seniors ILUs and significantly increased shadowing downslope from the ILUs in spring and summer (see diagrams Appendix B1), the main growing seasons could all be predicted to impact on both vegetation and animals, in addition to any loss of habitat through soil or rock movements down slope, or change in vegetation with drier conditions.

## 6. The treatment of other trees on site

The arborist's report lists 235 trees on this site. Due to the scale of the development it is proposed to remove over half, or 131 trees, to enable the development. The loss of so many trees from one small area all at once will have a devastating impact on local landscape, general canopy cover and on habitat (food, nesting places) particularly for birds and bats.

While some of the trees are weed species and some exotic (non-native), that most are listed as only in 'fair' condition by the Arborist's report, with some 'poor', is strange and difficult to believe. If true, then we are most sceptical of Hammondcare's ability to protect and conserve any of its trees. In addition, none are classified as W (weeds), despite quite clearly being so.

There is also quite inconsistent treatment of problem/weed species. For example:

Camphor Laurel - some are to be removed, noted as an inappropriate species e.g. trees 8, 32, 67, 68. Others are to be retained and protected e.g. trees 1, 60 and 61. This species is a major source of weed seed into bushland and is definitely an inappropriate species.

*Acer negundo* is sometimes shown as retain and protect (151, 152, 199, 81B) and sometimes to remove and replace with new plantings (153, 175, 203). This species is regarded as invasive, particularly for riparian areas. It is difficult to understand why this would be retained or replaced when important natives are going.

## Conclusion

This proposal represents an overdevelopment of this site with residential uses not appropriate under the special uses zoning, thus sterilising much of the site for future genuine health and medical uses. The residential apartment blocks on the edge of bushland will have major landscape impacts and potentially significant impacts on bushland downslope, while the EIS documentation is highly flawed in the lack of visual presentation of the development as viewed from any westerly direction. The loss of even small pockets of bushland on site, as well as other remnant native trees is to be deplored as reducing further the already pressured wildlife habitat of Lane Cove, much of which is to be lost for residential development, not health facilities. Such losses cannot be replaced by biodiversity credits out of the Lane Cove area.

4 April, 2019

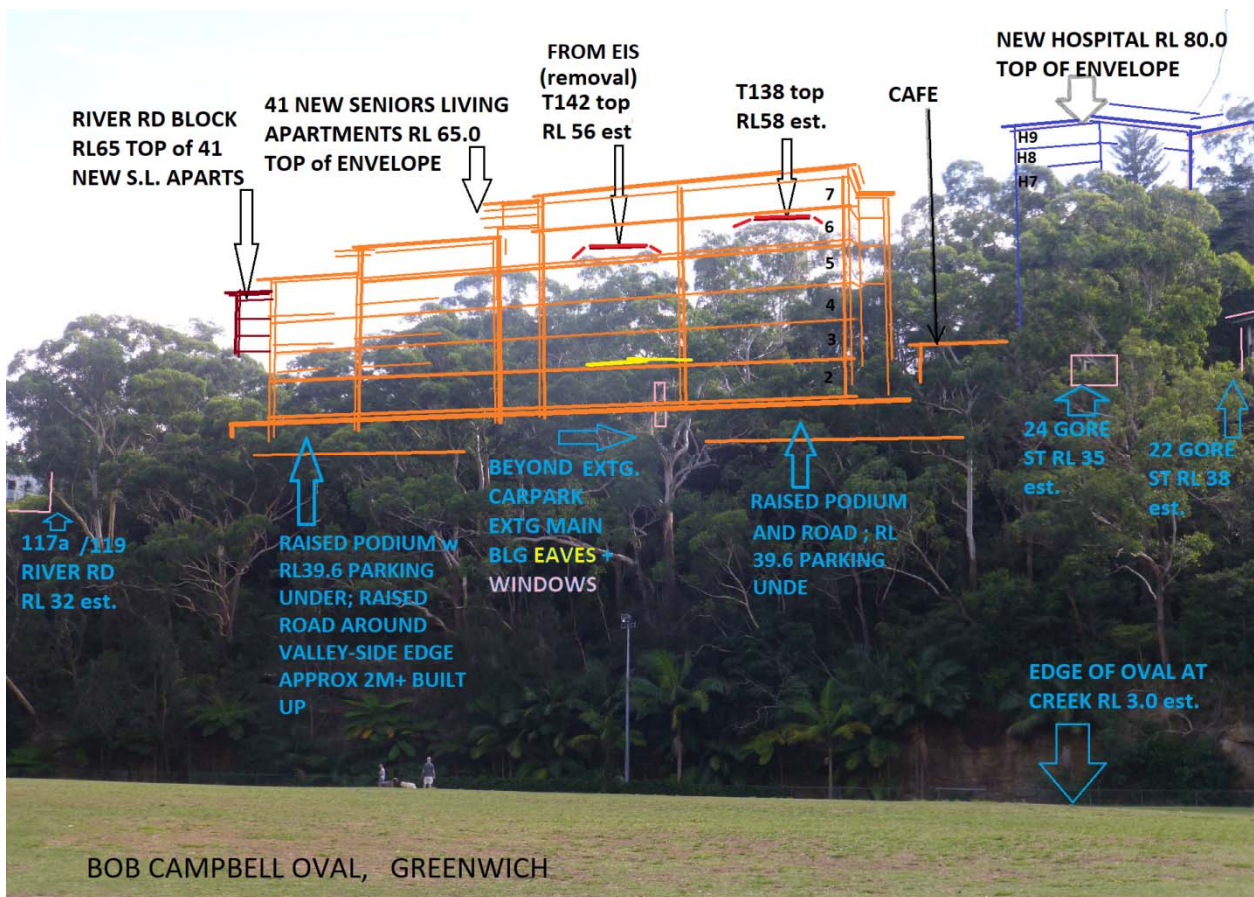
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See next page for Appendix 1.



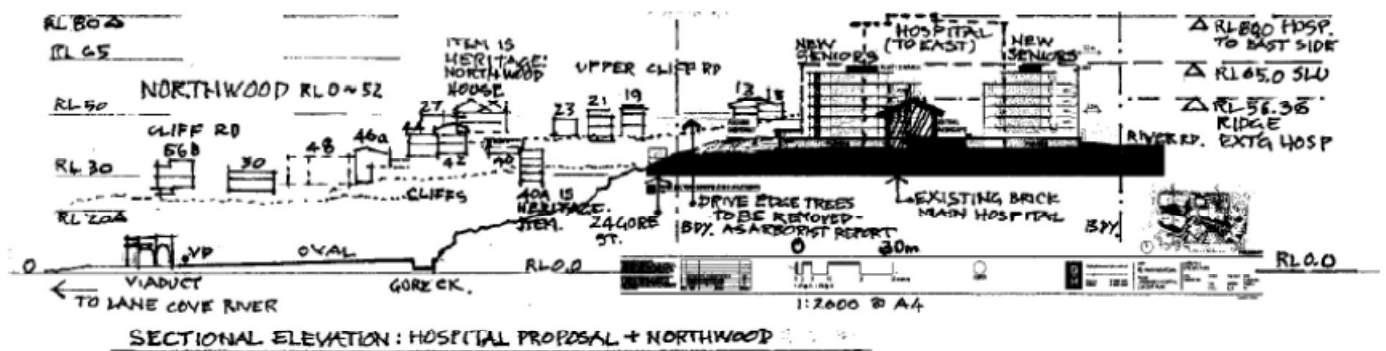
## Appendix 1: Mock-ups prepared by a member of the public in the absence of adequate material provided by the proponent

1.



Impression of Seniors Living Units and hospital building - scale and mass impact on the landscape as viewed from the west (Northwood)

2.



SECTIONAL ELEVATION- GREENWICH HOSPITAL EIS PROPOSAL IN NORTHWOOD CONTEXT –mark-up prepared by member of public .

Its purpose is to relate RLs of Cross-Section C – Seniors Living Apartments with adjoining bushland, playing oval, creek, homes in Northwood along Cliff Rd, Private Rd and Upper Cliff Rd, so that context is understood as EIS has not provided such information. NB 2 Heritage items have/will have vision of proposal:— E Blackett-designed Northwood House, in Private Road Northwood, and P Frischnecht-designed 40A Upper Cliff Rd, Northwood.

Setout preparation: adjust Sixmaps & Sect C to 1:2000, use drafting techniques, aerial view and local surveys to position cliffs, viaduct, homes . Northwood's RLs range from RL 0 to appr. max land RL 52 (interpolated from SixMaps). Number of homes which will have vision of the Redevelopment is in excess of those shown with arrows.

For 1 to 2000 outcome, Print on A4 Landscape format , Actual size, NB check scale bar and adjust if necessary as pdf and printing can alter correct scale.

Image 1140259 location indicated by VP.

Many properties on Upper Cliff Rd, Cliff Rd, Private Rd Road and beyond will see the new higher, closer development, even those who now do not currently see it.