

17 November, 2019

Attention: Megan Fu  
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The Department of NSW Planning and Environment  
GPO Box 39, Sydney NSW 2001.

**Submission for State Significance Development - SSD 17- 8699**

**Greenwich Hospital  
97-115 River Road, Greenwich, 2065  
Lane Cove Municipal Council**

This submission is made to the Department of Planning, Industry and Environment.

### **1. Background**

A development proposal was lodged for the Greenwich Hospital, owned by HammondCare, with the state government under a State Significance Development (SSD 8699).

This proposal represents a major transformation of the current site with:

- 89 Seniors Living units (2 apartments blocks);
- Hospital expansion to the existing 50 place hospital care facility by another 100 beds with inpatient/outpatient support services;

HammondCare intends to develop 2 tall buildings with residential 80 residential units rising up 7 storeys each, 9 independent living units as well as a hospital on the site.

We have reviewed the development proposal and various associated documentation. After due consideration of the relevant information and taking into account the objectives of the current LEP, DCP, SEPP, ADG, the relevant State planning legislation and planning objectives it becomes apparent that there are numerous challenges facing this proposal and that the proposal does not meet the intended outcome of the site. Based on these observations and findings this development proposal must be refused.

### **2. Representation**

This report is prepared on behalf of the Greenwich / St Leonards Action Group, a community based resident group in the St Leonards and Greenwich area.

### **3. Executive Summary**

The proposed development from HammondCare is incompatible with the site and the surrounding vicinity mainly due to the scale, massing and form. The proposal has excessive density, building height and bulk on a site that cannot handle such a development. The height of the two towers with 89 units will be more than double the current hospital's height, dominating a large area, affecting the surrounding sites and streets, Bob Campbell Oval, several nearby houses, Greenwich Public School, the heritage listed item Pallister House, further removing over 40% of the trees on site translates to more than 100 trees, creating more traffic, impeding circulation, restricting residents' movement and introducing pedestrian flow conflict.

In fact the proposed development does not establish appropriate design guidelines within the context of the locality, gross floor area (GFA), building footprints, height, massing of building envelopes, open space, landscaping and trees.

The so called increase in demand for high quality health care services and facilities is offset by the intense loss of amenity, services and infrastructure as the aged care units/residents would demand more resources, amenity and services than is put back into the community. This will be the third residential seniors' housing project in Greenwich within close vicinity, in the last couple of years. The concentration of such facilities in one area should not be encouraged as these use the same services and rely on the same facilities draining possible benefits to the community.

The claim in the DA EIS that the proposed development is in proximity to public transport networks, a range of services and facilities does not explain that these same services and infrastructure are already stretched in the area and will not cope with more demand from this site. In addition, there are more residential units on the way or in the process of being built, such as in St Leonards, that will be utilising the same facilities, services and infrastructure in the area thus all competing for these same resources and benefits exhausting existing levels.

The traffic impact assessment has down played the extent of traffic that will be generated from Greenwich Hospital site, the increased traffic in St Vincents Road and at intersections of River Road. The hospital is located at the corner of St Vincents Road and River Road West and is a notorious blackspot (listed in the top ten accident spots in Lane Cove). The traffic assessment report had failed to counter this problem.

Potential impacts arising from the proposed development cannot be mitigated and will bring extensive long-term and unreasonable impacts to the surrounding sites and especially Greenwich Public school.

Pallister House is listed on the NSW State Heritage Register and it is a rare example of a late Victorian Gentleman's residence within Greenwich. The heritage listed land and gardens of "Pallister House" will be seriously impacted with the proposed removal of several mature trees, gardens and historic sandstone walls.

The shadowing impact need to be effectively evaluated and included in the application on nearby sites and especially on Pallister House.

The impacts of construction process on adjacent community will be prolonged with long hours of noise and dust generated from this site.

We also object to the fact that the 2 towers with 7 storey height is part of the SSD proposal. The 2 high buildings with 7 Storeys each is inconsistent use with land zoned for health services facility. In fact the only SSD should be the hospital building but not the tall buildings as these should be classified as residential and assessed outside any SSD. These units are not true hospital facilities open to the public on daily basis but are more private in nature.

Proposal SSD 8699 for Senior Citizens independent living should be rejected and revert the planning for the site to strictly a hospital (without independent living units) with a more strategically reasonable medical and health parameters appropriate for good town planning that would lead to good community outcome.

#### ***4. Statutory Context, SSD and Strategic Justification***

In accordance with schedule 1 clause 14 of the State and Regional Development SEPP the proposed development is classified as State Significant Development because it is:

- (a) hospitals,
- (b) medical centres,
- (c) health, medical or related research facilities (which may also be associated with the facilities or research activities of a NSW local health district board, a University or an independent medical research institute).

The 2 towers with residential units are contrary to the above criteria and do not satisfy this classification, as such these units should not be part of the hospital SSD. The 2 tall buildings development do not respond to the need for additional health care services nor do these ensure that health, diversity and productivity of the environment is maintained and enhanced for the benefit of future generations. The public interest is not best served as these residential units do not promote sustainable development that is rational, orderly and economic.

The proposal exceeds current planning guidelines for the site. There is no support to amend the Development Control Plan 2010 and planning guidelines for the site for these two tall buildings. The justification used for this development as an SSD is of little value since providing some token additional hospital beds in light of the excessive residential units is not such a good outcome. The 80 residential units on the site for an additional 100 hospital beds does not make a logical counterbalance but would ultimately benefit the development itself rather than the community. There is a real need for more hospital services and larger medical facility to cater for the growing population but not more high rise units on this site.

The site should be predominantly for the use as a hospital with a main hospital facility on the whole site that includes inpatient hospital beds and services. The associated seniors living units are not an integral part of the hospital and in fact could be built anywhere on any site. As such the proposal should not be permissible with consent under the SP2 Infrastructure (Health Services Facilities) zoning. The 2 towers buildings are not capable of generating positive social, environmental and economic benefits to the local area as these will be utilising more services than allowed.

The proposed changes to the existing hospital will not ensure the infrastructure will meet the changing needs of the community nor ensure that the community can remain healthy and resilient. Furthermore the provision of senior's living units will not mean that local residents will be able to remain and age in a place rather than being removed from their social network. It will be highly unlikely that residents of the area will be able to reside in these units. Additionally the residents on the site will be drawing on resources, services and infrastructure thus producing suboptimal outcomes to the area from day one.

### **5. *Senior Citizens Housing***

Senior Citizens housing planning laws are a cheap method for developers to avoid planning requirements and laws. Senior Citizens units are a back door approach for developers to have these units approved and then change of purpose later on to sell for higher prices.

Builders and developers are discovering the economic potential of these aged care units bypassing existing code requirements. Economic factors are driving high prices for units and it is likely that sometime in the future these units may be sold as residential apartments. Such units would be built by passing planning rules and later to be sold off as residential units for more profit.

We like to raise the point of whether these residential units are appropriate on this health services site. These 89 units will probably be eventually converted to residential units and thus maximise the returns for the developer. Sidestepping requirements to give consent now under the medical guise, then abandoned for a cheaper alternative.

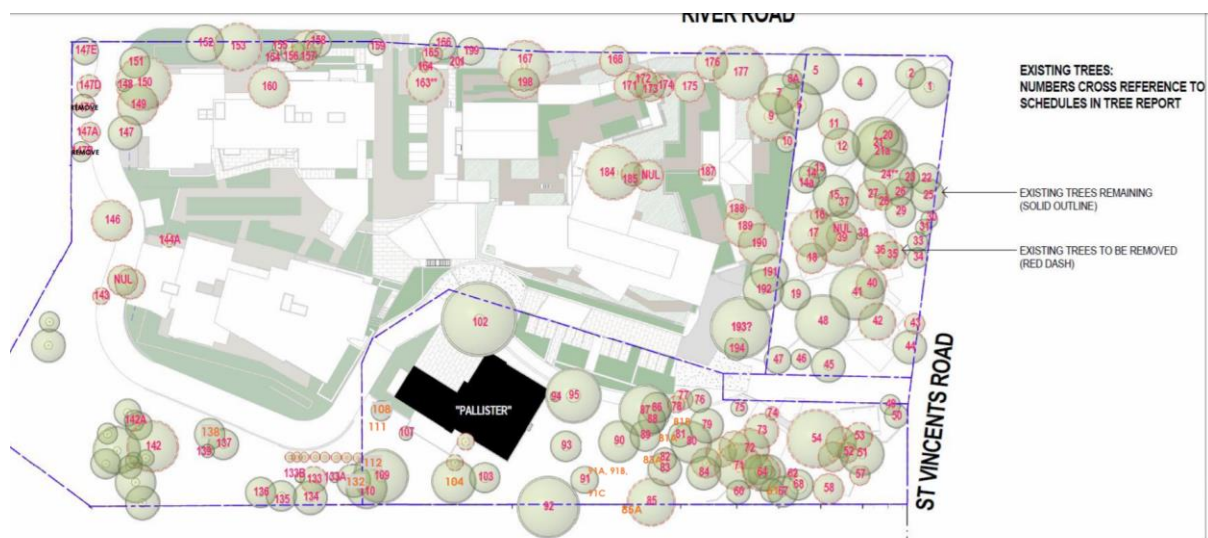
## 6. *Scale, Massing, Form and Sustainable Density*

The proposed development on the subject site has excessive massing, form, height and scale. The effective height of the 2 tall buildings is well over 30 meters each. From a real impact measure on the area this will in effect be similar to having a 100 meters high tower due to the dominance of single dwelling houses surrounding the site. The height is double the current hospital's height with potential to dominate Bob Campbell Oval, Northwood and nearby streets.

We also note that that 2 oversized tower buildings and Hospital cumulatively are no longer sustainable density on the site absorbing amenity and using up more of the air space, taking up more sunlight and creating more traffic. We also note that the proposed development on this site does not appear to be attempting to minimise impacts and take good design into consideration.

It is important to note that sustainable densities should respond to the site context, locality, availability of existing infrastructure, public transport, community facilities and environmental quality, guiding principles and SEPP 2004. However this development proposal does not respond well to the site or the locality.

There is a large loss of number of mature and attractive trees which is unacceptable. There is no need to take out so many trees and the only reason is to have the ability to build more residential units. The loss of trees for the area is not acceptable. This can be seen from the picture below.



To ensure this site does not continue to provide a suboptimal outcome this development application should be rejected.

## 7. *Site Context, Built Form and Urban Design*

The proposed development does not provide a building envelope to justify the proposed built form. The proposal did not provide accurate and complete impact assessment that identifies any potential impacts on the surrounding built environment. As such we call on better assessments



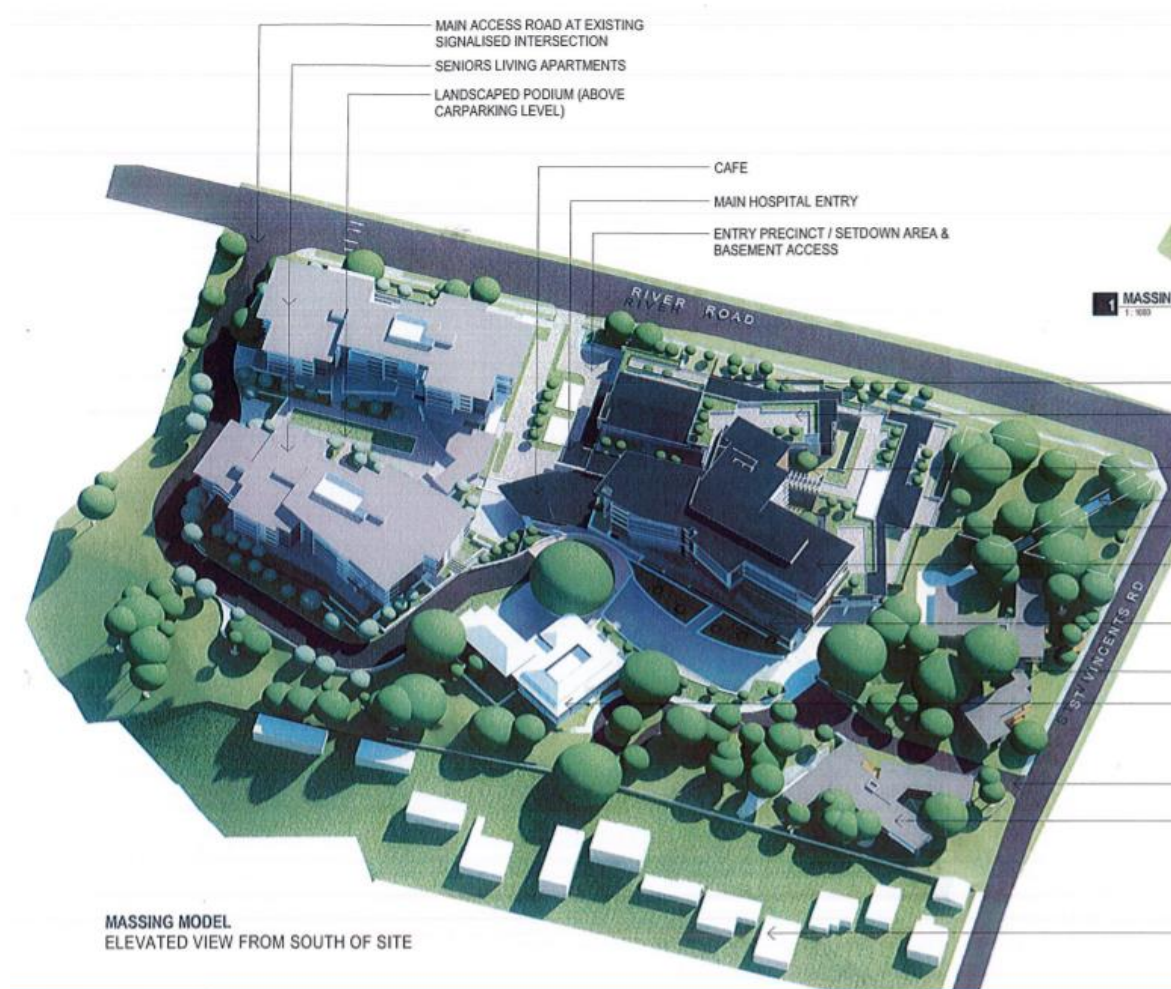
with far reaching parameters to be applied as the impact will be much broader and serious.

The site coverage from this proposal would result in significant issues, for the adjoining residential properties and Greenwich Public School. It will also negatively affect amenity and contravenes the requirements of several guidelines and principles such as SEPP 2004.

The assessment reports provide little detailed analysis on the impact of the site on nearby adjacent properties and Greenwich Public School. In fact the school is especially impacted that more analysis is warranted as student's safety and wellbeing is at risk. However in most part these reports are mute and play down the effect on the school and young students.

The tall buildings also exclude certain sections in the measurements which if included will bring the site coverage ratio to well above what could be considered as a good outcome for the locality.

**Please note** that the villas (the lowest structure on the site) in the picture below on the right hand side have been omitted from the DA.



The picture above shows the extent of scale and density on the site.

### 8. *Buildings Footprint and Floor Space*

The proposed development has a floor space ratio of 0.837:1. The proposed floor space ratio ("FSR") and the Gross Floor Area ("GFA") intensity on this site are still not acceptable. The excessive FSR and GFA are of such magnitude that would lead to outcomes that negatively affect the community and the surrounding area.

The built space with the 2 residential towers and Hospital would be contrary to the desired planning outcomes for the site as well as disproportionate with the surrounding area. The FSR is much higher than expected. If lifts, storage and common areas are included then the FSR is above that allowed by any calculations. The calculation of the floor space, building footprint and building GFA seems to be under estimated in the assessment reports.

The pictures below show the magnitude of the built space.

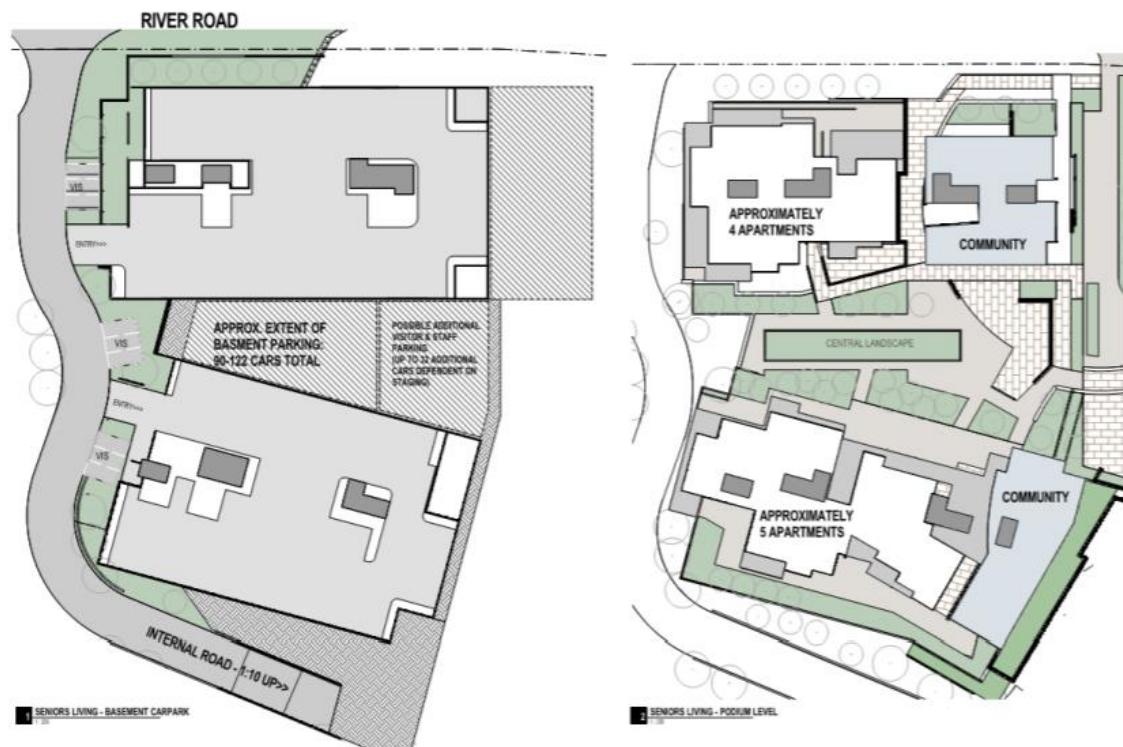




Figure 16: Seniors Housing (Apartments) 3D Perspective

### 9. *Enchrochment on Privacy and Overlooked Properties*

The proposal has shortages of generous setbacks and separation within the site and in relation to adjacent sites. More generous setbacks are needed to reduce the appearance of bulk, scale and preserve levels of privacy, sunlight and visual amenity that are enjoyed by neighbouring dwellings.

There is a vast corresponding loss in privacy due to the height of the towers overlooking in a large radius. As such transitions and setbacks guidelines should be reinforced and further strengthened.

### 10. *Transition and Set-backs*

There are several issues with the site and the way it impacts surrounding homes and the Sate Listed heritage Pallister House. We call for more generous and substantial transition as well as set-backs than already included in order to arrive at a better site outcome. In order to minimise this impact then:

- The actual built form has to be stepped down and even set back further from the nearby houses.
- More generous separation and setbacks between the proposed 2 tall building, and the hospital as well as to Palliser House with the rest of the site and surrounding areas.
- More open space and green areas around the buildings and the site should be added. There are more than 90 trees that will be removed.
- Few trees and limited landscaped pathways will not be adequate to compensate for the permanent bulk, height, site coverage and footprint.

### 11. *Visual Impact*

The overall aspect and character of the area is open with low density and an expansive outlook. The character of the locality is defined with low rise homes without excessive height and scale.



However there is a substantial visual impact from a 2 buildings with 30 meters height for a total of 89 units on the one site. The visual impact of a 30 meter tower is not negligible and there will be a level of visual sensitivity for all residents from the dominance of such tall buildings with noticeable reduction in visual amenities.

Any person looking at or facing the site will be met with solid walls of concrete bigger than any structure in the nearby area. These towers stand significantly higher than surrounding structures in the adjacent streets and thus create problems in terms of shape, bulk and view impacts.

### **12. *Infrastructure and Services***

The sheer size of the built site and the height of the 2 tall buildings are such that any benefits brought in from the health care campus site contribution will be wiped as aged care residents will consume all the benefits provided and infrastructure, while essential services will be reduced not enhanced.

Also the additional beds earmarked for this site is not considered sufficient to provide meaningful positive effect on the social infrastructure of the community to recover some of the lost amenity from this development proposal.

### **13. *Greenwich Public School***

Greenwich Public School is across the road from Greenwich Hospital. It is a long established primary/secondary school catering for years K to 6 providing a good school environment. The school is located on a good site that should be safeguarded. The wellbeing of the children is a priority and their safety is very important. There is a tremendous sense of belonging as it is the only school in Greenwich and it is also very crowded with students.

Throughout the DA assessment reports there is little mention of the risk and impact on Greenwich Public School from traffic, parking and more pedestrians not to mention the construction stages. There will be a large impact on the school and the students. It is suggested that a more appropriate and detailed study to be undertaken for the school. It is clear that the safety of children at Greenwich Public School may be at risk from the increase in traffic and parking on River Road and St Vincents Road. The SSD needs to guarantee that there is no impact on the students and school before it could be assessed for approval.

### **14. *Overshadowing and Sunlight***

The result of the height of the buildings and hospital from the proposed development on the site is overshadowing impacts on the surrounding properties, locality and the other streets. This site will contain 2 high towers at 30 meters high with 7 storeys height perched on the highest point in that area and will be the biggest structure in locality. The 2 towers will overshadow a broad sweep of residences. The hospital will even generate bigger shadowing impact even on the heritage listed item Pallister House on site. The total site aggregated will have far more negative shadow impacts than acknowledged in the DA. It is not clear to what extent has the shadow assessment model been adjusted for the area and the fact that it is not of even gradient.

It is important when looking at shadow impact across properties to consider the current situation. It is easy to claim that the properties and the site will not be materially impacted but it

is not certain to what extent some properties will be more severely impacted as compared to others. Hence, it is prudent in an area to have less reaching shadow impact and not adversely affect residents and the community.

The proposed 2 tower buildings do not achieve adequate levels of solar access to both buildings and when examined closely do not meet the SEPP and ADG Design Criteria. The self-shading is extensive and creates shadowing around the proposed development for extended periods of time. This also has a bearing on sustainability and the energy requirements of the development.

The indicative solar access studies are just indicative and no realistic solar access was undertaken. Furthermore realistic and appropriate solar testing will demonstrate that during mid-winter on the 22 June. The objective should be to have less units in order to obtain better outcomes with more direct sunlight to rooms and more private open space. A better solution for the site is smaller buildings development that would have a reduced shadowing outcome.

#### ***15. Pallister House and Grounds Heritage and Archaeological Impact***

The site contains heritage listed land and gardens in an L-shape heritage curtilage which contains a two-storey late Victorian house and grounds. This item represents a substantial portion of the site and is listed as state heritage item SHR 00574 – ‘Pallister House’.

The proposed development on the site does not have an acceptable heritage impact on Pallister House and further impacts the immediate setting that would lead to the misrepresentation of this heritage item.

The three articulated tower wings, even with set back from the Podium edge do not mitigate the visual impact of the structure but in fact contribute substantially to the impact to the extent that the heritage item will not be appreciated in its own setting. The proposed Hospital building will be in very close proximity and will encroach and visually dominate Pallister House.



This development alters the context of Pallister House by creating a denser built to the extent that Pallister House cannot be clearly understood and interpreted as a former substantial Victorian residence. The bulk, height and mass of the contemporary character of the architectural design of the towers mean that the Victorian character of the heritage item cannot be appreciated as an earlier form with the significance of the 1892 Victorian Gentlemen's residence.

The increase in density from the proposed development to the northern and western portions of the site will alter the visual setting of Pallister and will invariably alter the architectural fabric, form and character of the 1892 Victorian Gentlemen's residence. The apartment buildings do alter the understanding of the primary frontage of Pallister House and its setting and infringe on the curtilage of the heritage building. The southern apartment building is visible in views of Pallister from the access road approach off St Vincents Road. Views of the apartment building to the rear of Pallister do result in increasing the extent of built form included in views of the house from the east; they do interrupt an appreciation of the form, scale or character of the heritage item.

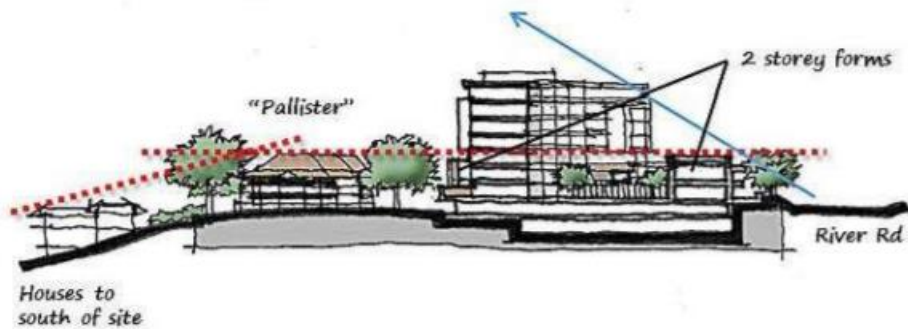


Image 6: Cross Section through the Hospital

If all the cumulative variations and site conversions are considered (and not in isolation) then Pallister House will have major impacts that are far reaching than stated in the DA assessment reports.

The DA Heritage consultant's report was not forthcoming with the bearings and brunt of the DA preferring to take a more "play it down" approach than revealing such impacts. This is disappointing as we expected better from a Heritage report that is looking at such a significant heritage item for the North Shore area.

Further the impact of removing more than 35 mature trees, gardens and historic sandstone walls (not disclosed in the Heritage expert consultant report) will diminish the significance of Pallister House.

A large number of trees will be removed from the heritage curtilage as part of the development. These trees have been in place for so long that they have become an integral part of the heritage item and cannot be assessed in isolation. While the trees may not have been identified as demonstrating individual heritage significance nonetheless the trees contribute to the heritage significance of the item and landscape. The community has grown to expect these trees to go hand in hand with this heritage item.

The only reason these trees will be removed and not replaced is to allow for the DA to go ahead. This is a very high price to pay for the construction and it is not a good reason to accept. No tree should be removed in order to ensure that Pallister House remains as significant as it is now and even for future generations. It is obvious that it will not be appreciated in its own setting for the future generations.

The proposed development typologies with the units and hospital by fact of their scale, bulk and form will suffocate Pallister House forcing the loss of Victorian character and further deteriorating its environment. Increasingly these impacts will work slowly to diminish the value and stature as a heritage item for the North Shore region with each passing year.

The North Shore community takes pride in the heritage items in the area and especially Pallister House as it is steeped in history and relating to the North Shore early settlement. Its significance is more important than it is to the developer. Its significance is under played and there are attempts to gradually minimise Pallister House significance.

It is important to note that the development will detrimentally impact the heritage significance of Pallister House as:

- The proposed development will indeed affect views to and from the heritage item. Primary views are affected from within the site and from the public domain. It is of little comfort the claim that the siting of the proposed buildings have taken the view to lessen the impact, which is untrue.
- The proposal does Not have an acceptable heritage impact on views to and from the heritage item. The views to Pallister House are from the east and north east, as approached from the bridle path and from St Vincents Road but the new vantage points from the north and west will be reduced.
- Even though the rear elevation is considered by the developer as a secondary view nonetheless it is still important for Pallister House settings to continue to exist in the same settings as before and to enjoy the same views without any further impact. The new vantage points from the north and west will be reduced and is not acceptable for a proposal to allow Pallister House not to be viewed and appreciated as an important heritage item.
- Views to the east and south will not be fully be retained and will in turn affect Pallister House with a loss of heritage context. The location of the proposed hospital building will obscure the current views to the north are over the existing hospital campus as the proposed building is notably higher than that existing. Views to the west will also be altered with the addition of the apartment buildings.

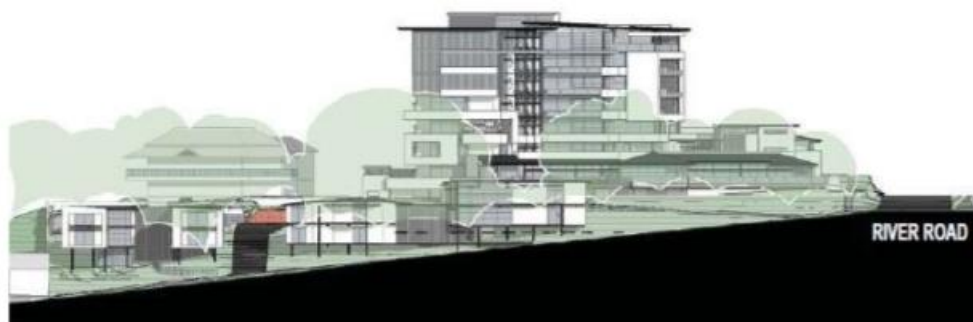


Figure 40 - Street view along St Vincent's Road showing the relationship between Pallister, the Hospital and the Villas. (Source: Bickerton Masters Architects)

*The picture shows Pallister House heritage item in relation to the tall buildings towers that dominate and overpower Pallister House.*



For the above reasons, the proposed development and the apartment buildings do not have an acceptable heritage impact on Pallister House and its immediate setting.

**16. Breaches in the Guidelines and Principles of SEPP 2004**

While the seniors living units are not listed to be considered under SEPP 65 (State Environmental Planning Policy 65 - Design Quality of Residential Apartment Development), nonetheless the proposal has not genuinely attempted to respect SEPP 65 and the nine design quality principles:

- Context and neighbourhood character;
- Built form and scale;
- Density;
- Sustainability;
- Landscape;
- Amenity;
- Safety;
- Housing diversity and social interaction; and
- Aesthetics.

We do not agree that this proposal should not adhere to the SEPP. The 2 buildings are analogous to residential buildings. Good building design is meant to provide a good outcome and not a design which has numerous issues on this site.

Upon further scrutiny of the proposal it becomes obvious that SEPP principles will not be met in most parts of the proposal despite the assessment reports claiming otherwise. These diversions should not be accepted in this site that needs these principles to derive a better outcome. Even though a design statement referencing these principles has been prepared by the architects Bickerton Masters, the proposal does not adequately address the context of the site and the other principles of the SEPP. It simply glosses over the real issues for the main elements of landscaping and slope, views and vistas and fails in specific areas as the proposed does not meet site constraints such as mass of the buildings, scale and bulk and especially when the Heritage item Pallister House is taken into consideration. This proposed development on this site is incapable of responding appropriately to these requirements with several deficiencies.

We further note that the number of breaches to SEPP will be cumulative and become excessive. Also breaches may be highlighted as minor in the assessment reports but should not be accepted by the consenting authority as these become major when added together.

The proposal demonstrated that the 2 towers and Hospital are incompatible on one site and cannot comply with the good urban design principles in SEPP and are not capable of consistency with the guidelines.

**17. Traffic, Roads and Parking**

The traffic generated from this site with the increase in units, visitors, new residents, pedestrians, services vehicles and emergency vehicles is not reflected at a correct level in the traffic assessment report; in fact it is underestimated and downplayed, based on our review of the report.

The traffic study ignored the fact that there are a large number of new units coming on the market soon, recently approved or in the process of being approved, that would generate a large amount of traffic for this site. The traffic assessment ignored the residential units from other developments in the extended St Leonards area which is relatively close to this site using the same River Road. It also ignored the driveways and the side streets that feed into River Road. As well the report ignored the Greenwich Public School parents pickups and drop offs. This site is located within an economic corridor close to St Leonards. This is a large portion of the total traffic generated by the other developments not factored into the model. In addition, when referring to the intersections nearby the traffic assessment report fails to cover the relevant catchment area for the intersections.

It is also not clear from the assessment report if the Roads and Maritime Services (RMS) request has been fully taken into consideration.

River Road is already experiencing high level of traffic and pedestrians. The cumulative traffic impact has only touched upon the traffic superficially and has ignored new developments in the LGAs. There are also new proposed developments that are being built or have been approved that will add to the traffic congestion and have not been addressed in the traffic assessment reports.

The assessment report appears to have used low levels of traffic generated by visitors and service vehicles. The assessment report further does not cover in detail the traffic generated from service vehicles which are likely to use the same streets.

Any traffic movement or congestion in this area will have a domino effect on the car traffic flow all the way onto the Pacific Highway and surrounding streets. We note that the traffic assessment report indicates that the intersections on River Road are currently at capacity during both peak periods operating “at less desirable capacity” and “beyond its notional capacity” for Greenwich Road and operating at “unacceptable levels” for to the Pacific Highway.

As well the increase in population density along the corridors to St Leonards / Greenwich from other nearby areas will mean that the roads will be over stretched and River Road not capable of taking the increased loads.

The road circulation for the new vehicles (at the current levels) including heavy vehicles is greatly understated. Also the cumulative impact from the additional developments around the area has been ignored.

As such we believe that the development application that allows taller buildings and higher towers with more residents will lead to more cars and traffic should be rejected on the basis that it is not appropriate from a traffic perspective and does not provide acceptable outcomes to the area.

The traffic report makes unrealistic assumptions regarding traffic for nearby streets such as Greenwich Road and St Vincents Street. For example the report asserts that the site allows for lower visitor parking. The point here is that visitor parking needs are not reliant on this site as it not close to transport and visitors originating and destination site will need to rely on cars.

### ***18. On-Street and Off-Street Parking***

The streets within the area are heavily parked and some car parking in several streets is impossible. The proposed development will create additional parking problems and exacerbate the parking and will not encourage the use of the buses or train station.

There is insufficient on-street and off-street parking for the proposed development. This area is not catered well with public transport patient's visitors will not be able to use public transport and will park on the site and most residents have 2 or 3 cars. The excuse being that the development is close to public transport but this does not preclude residents from using their cars for shopping, sports activity and more importantly visiting family and friends.

Street parking is very restricted in the area. There are large shortfalls in the provisions of parking spots for this development. The parking provisions based on the RMS standards fall short of the real requirement of the spaces.

The proposed development does not provide sufficient parking space to meet these requirements. In addition to this, there is already intense on-street parking pressure on surrounding roads.

### ***In Closing***

The design of the 2 towers along with the Hospital will contribute to overbearing visual impact and reduced amenity of the area. The scale and built form of this development has not been articulated to complement the streetscape and surrounding locality. The proposal does not represent rational, orderly, economic and sustainable use of the land. In fact it is the opposite as it is overbearing and unjustifiable massing on this site and therefore should not be supported.

The subject site is not suitable for this development and will result in significant and adverse impact such as overshadowing, privacy, amenity issues, traffic, Greenwich Public School, heritage impact and reduction in community services and infrastructure.

Mitigation measures are not sufficient to manage potential environmental risks and construction impacts. Pallister House is an important heritage item for the North Shore that should be further preserved and strengthened in its own setting. There will be loss of understanding of the heritage item. The development will lead to the public and community not able to view and appreciate Pallister House significance due to the countless incursions and attacks on its substance.

The development will facilitate very little additional employment opportunities and will be consuming resources rather than adding benefits to the area.

It is recommended that the development application be rejected on the grounds discussed above.

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