

NSW Department of Planning, Industry, and Environment  
320 Pitt Street NSW 2000  
Attention: Megan Fu

10 November 2019

**Subject: Redevelopment of Greenwich Hospital (Concept) SSD 8699**

I write to strongly object to the amended Greenwich Hospital redevelopment SSD No. 8699 (DA), incorporating 80 seniors' apartments, 9 seniors' living units and an extended hospital.

My objection covers numerous breaches in this DA which include:

**Hospital Zone and Site:** The DA incorporating 2 towers of seniors living with 80 seniors apartments, 9 seniors living units, the extended hospital is

- excessive,
- overbearing ,
- out of scale,
- dominating,
- does not interface well with the site, and
- does not interface well with the local area

The residential units if approved will form a large dominant mass on the site overpowering the health services aspect and disallowing any future hospital expansion. These residential units will deprive the community from the benefits of future health services expansion on this site in turn taking away the much needed space and services that will never be located in the nearby vicinities as there is no more room for expansion. In the future it will be extremely challenging and expensive (and even non-existent) to locate an area for the site to expand. There is a real need in the future to expand the hospital space which will prove to be too costly and too late to locate additional land for any expansion. The community, the area and the State government will lose out under this scenario.

In fact if this DA is approved then Greenwich Hospital will be so over powered with the amenities catering mainly for the senior residents of the units rather than patients. Again the ultimate loser will be health quality and services in the area. The result of such a DA on this site is much less capacity for the wider community as more emphasis is devoted to the residents and the units as a going concern and far removed from providing health services for the whole community. As such a narrow focused health services will be provided rather than appealing to a bigger section in the coming years. This site will become operational for the private minority and excluding the large majority of the community. This also means that the private interests will dominate rather than the public interest. Then the site will be more of unit living and no longer should be classed as a hospital since more than 50% of the site and services will be of a private nature dedicated to unit living.

It is essential to remember that the purpose of the Greenwich hospital is, and should remain, for the provisioning of general public medical services to the larger North Shore community. The hospital should continue to deliver the highest level of care with a range of unique support services to all patients and the whole community being inclusive rather than exclusive. If these residential units are

approved then it is very doubtful that the Greenwich Hospital will continue to provide high standard of services and wide services to cover a larger extended area of the community. Health provision to the Lane Cove community should be an absolute benevolent principle without any threats of private health provision with the exclusion of others and additionally constraints placed on its size and future operations.

Any available and accessible free space on the hospital site and around the hospital should be left for the future expansion of the medical hospital and not dedicated to very tall buildings and units to few private senior citizens.

***So much to lose and so little to gain:*** There are several areas of non-compliance and breaches with the height, density ratio, FSR, footprint, traffic less green open space, less parking, overshadowing, loss of trees, loss of heritage significance and more noise. It is not good enough to lose so much and gain so little. Little is gained with the few promised beds and so much is lost with the area's future capacity - more residential units with less amenity and few beds is not an equitable formulae. The community will be losing so much, surrendering future aspirations with little negligible benefits and inadequate outcomes for many generations.

***Guidelines and Principles (including SEPP and ADG):*** This development has the markings of an extremely high density residential building without the necessary controls that should be in place. These buildings are not suited for this site. The number of units is not sustainable and could not be supported in this area. These buildings should be assessed as residential units and be required to adhere to the SEPPs and guidelines as any other DA as it is a tower unit and the medical element is very slight. The sheer size and dominance nulls the health element and as such has to fall under the normal assessment of SEPPs and guidelines operating for any other DA – it is certainly not an SSD. This Development is more akin to very tall towers with similarities of dominating and taking over the spot.

A full site compatibility analysis and investigation should be undertaken for this development even if no SEPP is applicable to this application as this a such a large development with such magnitude, implications and scale that makes the hospital into insignificance due the implications of the new development on the locality.

The developer would be taking the wrong approach to concentrate a big portion of the site and its amenities on units'/towers developments. This is an unsuitable use of health resources in a medical precinct especially as the nearby area of RNS Hospital and St Leonards medical precinct – designated by the State Government.

There are several breaches and infringements from this DA in terms of the guidelines and principles that should not be tolerated. Contrary to what has been acknowledged by the proposal / development the SEPP for aged care facility must be applied. This proposal does not have design flexibility nor attempts to minimise impacts. Instead it impinges upon the locality and character of the neighbourhoods introducing complex problems that will not be easily resolved. As such all SEPPs, DCPs, LEPs and guidelines should be applied to this site in order to provide a better outcome for the health precinct, the residents, nearby streets and the North Shore community.

**Overshadowing:** Overshadowing will be a major breach in this DA due to the size of the DA on the site. Overshadowing will impact more properties, streets, vegetation, trees, back yards, Greenwich Public School, Thousands of school children and Pallister House than declared in the assessment reports.

With 7 storey buildings and more than 89 units overshadowing will be a major cause of distress as this will be extensive, enclosing the area and impacting a broad sweep area near the development. The loss of light in some areas will be considerable and permanent with the development casting a shadow over a larger area than expected especially during winter season and in July.

Sunlight and daylight will not be available and will be seriously affected during the winter solstice. The plans presented in the DA underplay this fact and is not shown properly or made public. Also access to solar light within the complex will be restricted despite the assertions in the reports to the opposite.

**Density and Scale:** This proposal is out of character with surrounding streets as it introduces excessive density and scale to the locality. Concentrating and crowding mass to such an extent that it would absorb amenities that will not be recoverable. Intensifying the site is not the solution for this site. This DA also has disproportionate height engulfing the surrounds and absorbing any sense of space and environment.

The 2 high buildings with 89 units will result in permanent excessive magnitude and dimensions on the area due to height, site coverage and footprint that the site and locality cannot deal with. This development represents extreme overdevelopment as the size and scale of the development are grossly incongruent with the location and as such is out of character with its surroundings. Increased FSR will lead to unacceptable consequences to the surrounds.

The development exceeds the maximum allowable height for aged care as it will also be unsafe for senior citizens to move around in buildings that are 7 floors high.

It is also important to remember that this high density DA does not exist in isolation of the rest of the local area. The DA exists in an area along with other high density residential developments in the close vicinity, such as in nearby St Leonards and Greenwich which are only a very short distance away; that use the same streets, roads, parking, public transport and infrastructure. In turn overwhelming a small vicinity of this part of suburb with more density, cramming, overcrowding, blocking driveways to exit from the side streets to River Road, obstructions of passages and congestion than is acceptable or supportable. The high density residential developments already built in the area use River Road as the main transport artery and so will this DA. This is an unacceptable outcome for the community.

The area is already full with less capacity low amenities, depleting services and lack of infrastructure that this DA will even deplete beyond the area's ability.

Also residents and patients of this DA will use the same St Leonards' area services i.e. sourcing the same amenity, the same infrastructure, the same buses, the same electricity supply and sewerage systems, the same parking spots, the same public transport and the same services. This DA SSD along with the other high density towers developments in St Leonards will utilise the same diminishing source of amenity and services to the extent that there is insufficient capacity to cater

for all these, then this will leave the area starving of much needed services, infrastructure and facilities that would not be readily augmented leaving the community with below par amenity and services.

Such services and infrastructure are not likely to be augmented or improved to a level that will compensate for all this consumption. As such this DA needs to consider the impact on amenity, services and infrastructure with other high density developments already being built or approved in order to provide true assessment of the impacts on St Leonards and Greenwich community.

**Greenwich Public School:** It is extremely disappointing that this DA has ignored the impact on the Greenwich Public School. This is perhaps one of the main matters that should have more attention devoted to the impacts. This proposal is particularly alarming as Greenwich Public School is nearby and will be impacted in relation to redirecting services and absorbing amenities away from the school. Also will bring more traffic and congestion to the school especially as its busiest times during drop off and school pickup times. To pretend that there is no impact from this DA is a fallacy.

The safety of the children due to more traffic and cars to the DA including Doctors, Nurses, Visitors, staff and service vehicles at all times of the day is a concern. The added numbers from the DA will introduce more cramming, bottleneck and conflict in the vicinity draining amenity and capacity for the school children. The DA will add to chaos already experienced by the school due to its own activities and add more to the turmoil. The students of Greenwich Public School will be unsafe and at risk from the additional traffic and will not be able to walk out of the school freely. Safety of the school children is important to the community and the DA has not considered these reasons appropriately.

**Traffic, Roads, Pedestrians, Parking and Driveways:** The development for 80 senior's apartments, 9 seniors' living units and the increase from 50 to 150 beds on the busiest street such as River Road could NOT be supported. This is a large upheaval on a small site. This development will also use streets that are unsuitable to take on more traffic. The proposal will create traffic chaos and congestion during peak hour traffic. This development will not only impact River Road but also Greenwich Road as well as the off streets that exit into River Road which find it more risky to exit their own driveways into River Road. Currently to join the traffic to River Road is difficult especially to exit into the heavy traffic as peak times due to the high volume of motor vehicles. Also exiting driveways and side streets at any time of the day is risky. River Road and Greenwich Roads are congested at best of times as these are the only exit and entry to a large section of Greenwich residents, St Leonards and the community at large.

Currently there is considerable traffic around Greenwich Hospital. Substantial numbers of vehicles access this site during the day and night. Any additional traffic will be unmanageable creating traffic bottleneck in and out of the hospital, added to by the residential units.

There will be a substantial increase in the number of cars for staff, visitors, Doctors, Nurses, residents, ambulance and service vehicles frequenting the area on daily basis and at any time of the day and night. The traffic generated from the development with a large number of additional new residents, visitors, garbage trucks, services vehicles, ambulances and more pedestrians has to be taken into consideration in the traffic assessment report; including school drop off and pickup times for Greenwich Public School across the road.

The traffic impact of the cars frequenting the complex has not been assessed correctly. The traffic impact of cars turning into the car park (particularly turning right), has not been reported accurately in the traffic assessment reports.

There is a large portion of the total traffic generated by the other developments in St Leonards that should be factored into the all traffic assessment reports. The cumulative traffic assessment should not ignore the new units recently built or in the process of being built from nearby developments that will use River Road as a main road from St Leonards. As such the number of cars on River Road will be increased substantially and this should be reflected in the assessments reports for this DA.

There will also be a dangerous outflow/inflow to and from River Road that will create more congestion and dangerous junctions. Pedestrian flow will further create more conflict near the site.

This development will bring more traffic, more cars and more pedestrians which will place more demand on off street parking. There is no adequate car parking for the number of staff, Doctors, Nurses, visitors and service cars for such a complex. Off street parking is scarce in this area and during school hours times it is even more difficult. The DA fails to cater for parking requirements for such a complex choosing to underplay the real needs for parking spots and hiding behind erroneous assumptions.

Moreover the traffic assessment reports did not take into consideration that:

- The background traffic growth rate for the traffic assessment report is based on a very low percentage that has been superseded due to the recent increase in residential developments.
- The cumulative effect of numerous recent developments that are approved or in the process of being approved that will feed into River Road in the near future has been ignored.
- Parking on weekdays to access this site is a challenge at best and there is a need to add more onsite parking as the streets will not cope.
- The traffic flow around Greenwich Road and feeding into River Road will be much worst while there will be an impact on the safety and wellbeing for residents.
- Exiting from Driveways and off streets has been completely ignored by the reports.
- Off streets with resident's cars that feed into River Road such as Anglo Rd, Duntroon Ave, Portview Rd, Park Rd, Park Lane, Canberra Ave, as well as Greenwich Road have been ignored. Residents in these streets find it hard to join the traffic and this will be exacerbated and residents lives at risk from the additional development.

If this development is approved then more cars will be on the streets rendering it problematic for RMS, Greenwich Public school, the residents in surrounding streets, the community. This will not be easily resolved.

**Open and Green Space:** This development does not provide appropriate green and open space to cater for the residents that will live at that site. In fact the DA takes away some of the existing green and open space by encouraging its residents to use other public green and open space in the area, minimising the green space already on the site by building more concrete. This development should retain all open and green space and not suck any existing open space. It is an unacceptable outcome to take away existing open space and trees to build more concrete and units. There are several trees that will be removed for the expansion. The proposed landscaping will not be adequate to

compensate for the permanent excessive bulk, size, height, site coverage and footprint that the area has to settle for. Some minor plants and planters will not be sufficient to make up for the loss. Nor will this be sufficient for the residents and the Hospital patients and visitors to use the green space.

Furthermore the development should not rely on any other open or green space in the locality which is publicly provided and paid for by the rate payers which is already over exhausted.

**Non Compliance:** There is non-compliance with the planning guidelines to the extent that the development needs to be re-assessed. If all the breaches are added together then this will amount to major contraventions that should not be accepted. As well, the cumulative number of concerns is excessive to the extent that this development should be refused. Having the additional hospital beds does not make up for the breaches, infringements, contraventions, bulk and loss of amenity, services and infrastructure.

**Transition, Set Backs and Separations:** It is important that transitions and setbacks are made much more generous due to the impact of the height, scale and footprint on the local vicinity. The existing has minimal setback from the boundaries for such tall buildings and from the leading edge of the buildings. As such all buildings need to have more generous setbacks, up to 30 times than the proposed in order to ensure that the development is not overwhelming the nearby properties.

**Environmental Concerns:** This development will not sit well in this environment especially as senior citizens require more services and amenity than expected and will be consuming more services and infrastructure. This development will have large quantities of concrete, high walls and suffer from the lack of sufficient natural vegetation. Little sunlight, improper ventilation, lack of trees, inadequate landscaping and little open space will impact the environment and the local community. The DA will add to traffic (as explained above) and congestion.

**Heritage:** Local North Shore historical heritage icons are not respected and the DA impacts Pallister (formerly Standish) Mansion. This Mansion is an important heritage item that needs to be safeguarded and preserved. It is an important element in the Lower North shore and Greenwich history. Pallister Mansion incorporates the late Victorian house known as Standish, which was built as a residence for John St Vincent Welch and his family in 1892. Standish is a rare example of a late Victorian Gentleman's residence within Greenwich. It is the best surviving example of a late Victorian gentleman's villa and remnant garden setting, including a tear-drop shaped carriage loop in Greenwich.

The development impacts Pallister Mansion to a great degree and slowly starts to diminish its significance to the community. The outcome would be depriving the community from a heritage item that would maintain strong connection to future generations.

The below picture shows the impact, shadowing and bulk, of the buildings surrounding Pallister Mansion reducing it to insignificance due to size and scale of the inappropriate surrounding development.



**Community Opposition and Outcomes:** It is not a good trade-off for the community to have oversized tall buildings on this site that should be spared for future generation for future hospital expansion. This DA is consuming so much space sunlight green space and overwhelming the vicinity in return for a slightly bigger hospital and some additional beds. The community does not welcome this trade-off nor accepts this outcome. I hope that you can hear the voices of the community when they echo “We deserve better health outcomes than this”.

There has been mounting community opposition to this development disguised as a hospital. It is obvious that the community has several issues with this proposal. More stringent assessments on traffic, sewage, electricity, facilities, noise, bulk, scale, height, transition, open space, heritage, green space, setbacks and shadowing should be provided and the plans re-assessed.

The Greenwich Hospital site is meant to be a dedicated area strictly for health services for the use as a highest level of care catering for any needed future expansion.

The impact on local residents will be immeasurable. This development is not compatible with the area or the site. This development has substantial and significant numbers of breaches and compromises which are serious enough to warrant refusal or at a minimum major amendments to the proposal for the 2 high towers. The 2 high 7 storey buildings and larger hospital will remain for the rest of time consuming amenity and creating traffic with little benefit to the residents and the community.

The conduct in which this development has been dealt with throughout the process undermines the faith of the community and puts a shadow over this proposal. The community has not been consulted sufficiently and remain sceptical of the outcome.

This development must be assessed in light of community concerns. It is but an overgrown DA disguised as an SSD and should be rejected based on the above reasons.

Yours faithfully