

Redevelopment of Greenwich Hospital (Second Concept Proposal)

SSD 17_8699

This submission comes from the 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 it will focus predominantly on issues related to biodiversity or bushland on, adjacent to, or close to the proposed development. This group also made a submission as a group on the first concept proposal.

We reiterate 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 second proposal

Some proposed outcomes in a number of aspects of concern to us have improved in the second proposal and we acknowledge this through our discussion, others have not.

In summary our concerns are:

1. Permissible land use on this site: where this plan is proposing to develop a large proportion of the site for residential uses, not permitted under current zoning
2. Impacts on bushland, particularly the design that places high blocks (5-7 stories) of Seniors Living Units on the edge of bushland with consequent impacts on downslope bushland and views from both land and water from the west.
3. Biodiversity impacts of the development both on-site and on the adjacent bushland.
4. Tree removal and replacement, and landscaping principles

1. Permissible land uses

The newly articulated model of serviced seniors living, more integrated with hospital services, and based on units that are not subject to strata and sold, may provide a more acceptable rationale for a seniors living function on the site. However, we consider that:

1. The model needs to be much more clearly detailed and explained as to its actual benefits to the community, and how it will work, particularly the financial aspects, given the proposal clearly states the funding to build the hospital is dependent on the seniors living (yet proposes to build the hospital first). There are also new components of the model poorly covered in the documents. For example, p.10 of the 'Response to Submissions' shows a Residential Aged Care facility on the site (part of the continuum of care) but this is not shown elsewhere in the plans. Nor is the role of the new respite facility explained.
2. Despite this apparently more integrated approach, too much of the site and the GFA is occupied by seniors living, where the units may well be occupied over many years by perfectly healthy and relatively young seniors. Tipping the balance of uses slightly towards the hospital compared to residential has not addressed the fact that it is a residential use of a special purposes (health services) site, where residential is NOT a permissible use.

The two seniors living blocks occupy so much of the developable site (i.e. excluding Pallister House and its curtilage) that they exclude further development of health-related uses on the site in future years as needs change and grow with increasing population. Taken just on GFA, the seniors living still comprises almost half (47.3%). The notion that these buildings could be converted to other health-related uses in the future (p.11 *Response to Submissions Report*) is fanciful given the prospect of dispossessing many elderly people from their units. Moreover, the internal structure of these buildings is unlikely to be suitably configured for other uses, and would require extensive modification.

2a. Impacts of the Seniors Living blocks

This second proposal has modified the building envelopes for the large seniors living blocks with a small 'stepping down' effect from east to west and retention of more trees on the western side. This will modify the visual impact to a minor extent. However, the blocks are almost the same height as the original proposal at the eastern end (RL 63.2m compared to RL 65m) and at 5 storeys at the western end, will still rise well above the existing tree canopy downslope as shown in cross-sections B (Drawing S.04), Appendix B1 to original proposal.

They also remain large buildings with extensive basement carparking, to be built close to bushland.

Landscape impacts Even with the reconfigured building envelopes, these large seniors living blocks will have significant landscape impacts as viewed from the west. Blocks which are 5-7 storeys and rising well above a downslope tree canopy, they clearly will be obtrusive on the skyline from at least some viewpoints. Only two visual assessments from the west, Views 2 and 6, have been included in the visual assessment (Appendix H), with a further one from the northwest on River Road (View 13). We do not consider the photo montage of the view from Bob Campbell oval (p.47 of Appendix H, repeated on p.18 of Response to Submissions) reasonably represents the extent to which a 5 storey (at this end only) building will project above the depleted adjacent tree canopy and impact the views from the oval and reserve and the ambience of these spaces. In addition, the analysis of the visual impact at View 6 relies on growth of new tree planting to ameliorate impact, growth which will take at least 30 years to achieve.

Construction impacts on bushland: There is a small patch of native vegetation on the western edge of the site, which merges into the bushland of the reserve on the slopes below. As noted in our previous submission, 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 works for the seniors living 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, some damage is likely even if all this is in place (which is rare for building sites).

Long-term stormwater and drainage impacts on bushland: 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 large 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, with subsequent tree death (and even less screening of these buildings as viewed from the west).

Other impacts on bushland: Noise, particularly during construction, light shedding from the completed seniors apartments and increased shadowing downslope from the seniors blocks in spring and summer 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. The large mass of these buildings will act as a substantial absorber and re-radiator of heat into the atmosphere and into the bushland. In addition, all the hot air expelled by air conditioners on all the glass-walled units facing west will create an additional heat load on bushland at a time when climate change is already raising summertime temperatures.

2b. Impacts on the eastern (St Vincents Road) bush remnants on site

The new proposal has significantly improved outcomes in this zone with the removal of any structures from the patch to the south of the access road, but there must be a commitment to appropriately maintain, regenerate and nurture this bush area.

However, the three-storey respite facility will significantly impact the patch north of the access road, removing trees and almost cutting the patch into two even smaller fragments, particularly once paths and

other exterior paving is added. This disrupts the connectivity of this corridor to the nearby bushland identified in the ecological report (Appendix N1).

Most of the eastern bushland will experience significantly increased afternoon shadowing, particularly in spring and winter.

3. Biodiversity impacts

The main issues of concern are:

1. The overall loss of trees (any species) and the impact on habitat (for birds, bats, arboreal mammals etc). The biodiversity assessment for the original proposal gave little consideration to birds in particular, yet they are major users of the trees that will be removed for the development. 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 so little remains and all remnants are precious, both as historical records and in the provision of networked habitats and corridors. Historical records cannot be replicated by replacement planting and the local wildlife (bats, possums birds) have so little habitat that the loss of anything they use locally may bring on a tipping point for their viability.

Under the current proposal 86 trees are to be removed. This is a significant improvement on the 131 trees to be removed under the previous proposal, but it will still result in immediate habitat impact. Staging the development and attendant tree removal is critical so that trees are not lost all at once, and replacement with advanced specimens with excellent post-planting care is also important to ensure habitat is replaced as soon as possible.

The Response to Submissions claims there will be an overall increase in trees on site but with a loss of 86 trees and replanting of only 60, this cannot be seen as an increase. Under the current plan there is a long-term net loss of 26 trees to this site.

Of the trees to be removed in the current proposal:

- 9 are to be removed due to internal structural/disease problems
- 28 are weed/invasive species
- 25 are exotic species or non-local Australian natives
- 10 are significant local tree species: 6 x *Euc. pilularis*, 1 x *Euc. saligna*, 2 x *Angophora costata* and 1 x *A. bakeri*. Two of these (blackbutts) are rated as of high significance even by the Arborists report.
- 6 are other local natives: 4 x *Ficus rubiginosa*, 1 x *Callistemon citrinus* and 1 x *Syzygium smithii*.

2. Loss of native species, especially tree species of the original vegetation anywhere on site, and any stands of remnant bush which include at least some of the key habitat of mid- and/or ground story species. These represent important components of Lane Cove's history and heritage. It is a positive step that the new proposal approximately halves local native tree loss and removes any building from the bushland pocket in the southeast corner.

However, we are opposed to loss of indigenous/local native tree species, particularly the ten eucalypts and angophoras listed above. Of the 10 significant local trees to go in the new proposal, six (5 x Blackbutt, 1 x *A. costata*) are for the main hospital and 4 (one each of Blackbutt, Bluegum (*E. saligna*), *A. costata*, and *A. bakeri*) are for the respite facility. Relocation of the respite facility to within the main built complex would avoid fragmentation of this bush patch and reduce the loss of indigenous trees.

4. Replacing trees and landscaping

Removing non-indigenous trees: Careful and staged removal of weedy/invasive species (as in the list above) is positive, especially where replaced by advanced indigenous native species. Our view of removal of non-weedy exotic species or non-local natives depends on the context and the specimen – loss of a fine mature specimen which is serving landscape and habitat functions is damaging but can be more positive in the longer-term where replaced by locally indigenous species.

There are 16 trees proposed for retention and protection, that should be strongly considered for removal as they are weed/exempt species that damage bushland and invade gardens. These should be removed in preference to non-weedy exotic species or non-local natives. The 16 weed trees are:

- 6 x Camphor Laurel - other specimens are slated for removal on the basis it is an inappropriate species (8), an exempt species, or an environmental weed (191, 192, 248).
- 7 x Acer negundo, other specimens being removed are 'exempt species' or 'exempt if under 6m'.
- 2 x *Celtis* (Hackberry), others being removed described as 'exempt species' (230, 240, 242).
- 1 x Coral Tree, other specimens also slated for removal as exempt species.

Landscaping: Lane Cove LGA, including Greenwich, has a strongly leafy character, particularly characterised by bushland in reserves and extending through the suburbs with pockets of private bushland and planting of locally indigenous species. Lane Cove Council has had landscape policies in place since the 1970s to foster this character with indigenous landscaping requirements for all medium/high density residential, commercial and industrial development. A primary aim of the current Lane Cove LEP (2009) 'to preserve and, where appropriate, improve the existing character, amenity and environmental quality of the land to which this plan applies'. This is currently laid out in DCP Part J Landscaping in which the first clause of the objectives is: *For medium/high density residential, commercial and industrial development, all substantial trees and that part of the landscaping scheme visible from the public domain shall comprise indigenous plants.*

In this proposal, for trees being removed the arborists report notes the work as 'Remove & replace with new plantings as per Landscape Plan'. However, there is no landscape plan at present. There is a 'Landscape Package' (Appendix L) which outlines the major landscaping zones and their key design principles but is 'broad brush' in nature. It does not describe, recommend or mandate indigenous planting, nor make any reference to Lane Cove Council's DCP Part J Landscaping. The summary of key changes, Table 1 in section 3.1, p.21 'Response to Submissions Report', indicates very little focus on indigenous species, being limited to retention around boundaries to 'soften edges and screen buildings'.

There is no guarantee that native trees lost will be replaced with similar species, nor that this development will result in an overall improvement in the site's contribution to the bushland character and wildlife habitat in Lane Cove, creating greater harmony with the bushland reserve on its boundary and the remnants on its site. The site has the potential to make a very valuable contribution to local bushland character and to provide an extension to the bushland habitat on-site and in the nearby reserve, as well as adding to wildlife corridor connectivity in the local area. This potential is ignored in the Landscape Package. It should also be noted that much of this site will actually be 'public domain', frequently visited by members of the public, thus DCP Part J should apply across the site.

Conclusion

The new proposal contains a number of improvements over the first concept proposal, specifically removal of any structures from the southern bush patch in the Pallister House curtilage on St Vincents Road, a reduction in trees removed and adjustments of building envelopes to be more environmentally sensitive. However, the new proposal still represents an overdevelopment of the site with residential, rather than health uses. The integrated seniors care model needs much better explanation, but even with this, the seniors living blocks are still too large for their proximity to bushland and their general context and are likely to have significant downslope impacts both during construction and after completion.

In terms of biodiversity, there is insufficient recognition of the function of trees on site as habitat, the impacts of removal of so many trees on local habitat availability, and the need for appropriate indigenous landscaping. The respite facility should be relocated to within the main built complex so that the bush north of the access road, which provides historic context for the 'bridle path' can also be preserved.

15 December, 2019

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