

16 December 2019

To Whom it may concern

**Re: SSD 17_8699 – Greenwich Hospital Redevelopment – 97-115 River Road, Greenwich
AMENDED PLANS**

We would like to submit our strong objection to the proposed redevelopment of Greenwich Hospital.

Whilst we support a redevelopment of the hospital, such should be sympathetic to the existing context and state heritage item (Pallister House) and the amended scheme does not achieve such.

Our objection dated 31 March 2019 still largely stands, although due to the amendments some of the matters have been resolved.

In summary, our key concerns are as follows:

- The **Seniors living** element should not reduce the opportunity for the hospital component to be consistent with the surrounding context.
- The **removal of the tree canopy** would be detrimental to the character of the area.
- The **bulk and scale of the development** is excessive and is inconsistent with the character of the area;
- The **visual impact** of the development, in particular the hospital component will have a detrimental impact on the amenity of our property;
- The **scale of the development** is out of context with the surrounding residential development;
- The **impact on the state listed heritage item** due to the scale and proximity of the development;
- **Poor Design** resulting in poor amenity to users ;
- The **'Engagement' was not engagement** but an opportunity for the proponent to sell the idea of the development. Feedback was not considered as amended plans had already been prepared.
- **Traffic** – this has not been appropriately resolved. It is difficult to ascertain the impacts when the traffic report is flawed and has numerous omissions
- **Tree removal** – is excessive

Seniors Living

It is still unclear how the seniors living component is ancillary to the hospital redevelopment. The inclusion of this component utilises valuable land that is zoned for infrastructure and 'pushes' the scale of the hospital development 'up'. If the hospital component can't be designed to be compatible with the surrounding context, the seniors living component should be deleted to enable such. The proponent may wish to acquire other sites in the area where Seniors Living can be provided should it wish to pursue its 'vision'. Seniors Living is inconsistent with the definition of ***health services facility*** of which the site is zoned and with the vision of the proponent, in providing a 'hospital in the home'. This vision could be provided on another site within close proximity to the subject site without utilising valuable infrastructure land.

The proponents claim that this component will be offered on a licensed basis is inconsistent with the definition of seniors living and as such cannot be relied upon (and could be sold off after any consent issued). By virtue of the definition, this component can be and could be, independently owned and as such is not ancillary. This is reinforced by the definition of such which states that seniors housing “*but does not include a hospital*” and that the definition of Seniors Housing is that they are ‘Independent’.

Furthermore, the Seniors Living component is at odds with the objective of the SEPP in “*setting out design principles that should be followed to achieve built form that responds to the characteristics of its site and form*”. In particular, the proposal is contrary to Clause 33, which relates to neighbourhood amenity and streetscape in ignoring the heights of the adjacent buildings and not retaining major trees.

Visual Impact

The development, in particular the hospital building, is clearly inconsistent with the context of the area and this has been depicted in numerous photo montages provided by the applicant. It is noted that the justification relies on the development being screened by trees. This justification is inconsistent with Land & Environment Court Planning Principles which clearly conclude that development cannot rely on landscaping to mitigate impacts

(<https://www.caselaw.nsw.gov.au/decision/549f82ad3004262463ab91fc>). Trees will come and go and this is not a justification for a bad planning outcome.

The proponent justifies the height of the hospital on the ‘minimal operation and design requirements’ but fails to note that these could be accommodated with a lower height if the seniors living was deleted or provided on another site. Whilst the benefits of ‘vertical hospitals’ is appreciated, the impact of such should not be at the cost of the surrounding area. The argument that a hospital that is lower in scale would not be fit for purposes is flawed. There are numerous hospitals around the world that manage to operate efficiently without such scale.

Whilst there are no FSR or height limitations on the site, the following objectives are relevant:

LEP

(b) to preserve and, where appropriate, improve the existing character, amenity and environmental quality of the land to which this Plan applies in accordance with the indicated expectations of the community,

SEPP (Seniors Housing)

(b) setting out design principles that should be followed to achieve built form that responds to the characteristics of its site and form, and

The adverse visual impact and the scale of the development, which is clearly inconsistent with the existing context is clearly depicted in the visual assessment. One of which examples is provided below:



Existing View.



How this is considered to be acceptable given the objectives or compatible is mind boggling.

Furthermore, this montage only demonstrates impacts from far east of the proposal and does not demonstrate the impact from the private open space areas of properties further west, and closer to the site.

Impact on state heritage item

The removal of the seniors villas to the east of Pallister is positive however the excessive scale of the development (some 20 metres above) in such close proximity to Pallister is likely to have significant impacts on the curtilage of the item. Please refer to our previous submission with regard to this concern.

Traffic

The proponent has not responded to the question /concern relating to the existing access to the site from St Vincents road (currently has limited access controlled by a gate 7am to 7pm). The proposed development is likely to increase traffic down this access road and onto Gore Street which is limited in width for through traffic due to on-street parking and road width (particularly at the intersection with Carlotta). This limitation of Gore Street has not been addressed in the Traffic report.

It is unclear if the access point to St Vincents is proposed to remain with 'controlled access' as depicted in the 'access and connection' image in the original design statement and which is not identified in the Traffic report as being retained as 'controlled'. Opening the access driveway on St Vincents Road to be 24 hours is likely to significantly increase the traffic movements on this road and Gore Street. The T&PIA makes no assessment of this impact but limits its assessment to River Road and St Vincents. As the Bushfire report indicates that the through road to St Vincent's will be available and as such would indicate that this road would not have restricted hours of access (as is currently the case) an assessment of this potential impact is paramount.

The Traffic Report is inadequate due to the following (which were previously raised and not addressed by the proponent):

- Does not identify either the existing or proposed limits on the driveway access to St Vincent's Road;
- Only includes traffic counts from one day (October 2017). It is likely that due to this date being so close to school holidays that it does not provide a true reflection.
- Does not consider the impacts as a result of the parking spaces proposed;
- Doesn't include accurate information on the number of existing parking spaces;

Tree removal

The development entails approximately 33% of all trees on the site to be removed. Whilst replacement planting is encouraged, it will take a considerable number of years for these to reach maturity which is likely to result in significant impact on the landscape setting of the area.

It is also ironic that the proponent justifies the appearance of the building as okay as it will be screened by vegetation but does not demonstrate in the photo montages the actual image including removing the trees from the image.

Accessibility

This doesn't appear to have been addressed with the exception of saying 'compliance capacity exists'. How this compliance will be achieved without significantly elevated platform pathways and removal of further trees is unknown. Furthermore, no detail of services at destination stops nor their accessibility has been provided.

Requested conditions

Whilst the proposal is not supported and the application should be refused. Notwithstanding, if approval is granted the following conditions should be imposed:

1. The proposed hospital shall be limited to a maximum of 4 storeys in height to enable it to be sympathetic with the character of the area.

2. The footpath along River Road adjacent to the northern boundary of the site shall be redesigned and reconstructed with no or minimal steps to provide a safe pedestrian pathway.
3. A new footpath along the eastern portion of Carlotta Street from Gore Street to Oscar street shall be provided to enable safe pedestrian access & contribute to the economic development of the area and the local business strip (Greenwich local shops).
4. The access point from the site to St Vincents Road should either be closed or at minimum limited access from 7am to 7pm and a median strip barrier provided to prevent right hand turns from the driveway onto St Vincents Road.
5. A Plan of Management shall be submitted with future Development Applications which clearly indicate how the operation of the hospital & seniors living will be managed to minimise impacts on the surrounding residents including (but not limited to):
 - a. Acoustic impacts particularly after 7pm to 7am, Saturdays and Sundays;
 - b. Traffic including deliveries and patient transport
 - c. Light spill
 - d. Licensing basis of Seniors Living and on-going relationship with the hospital
6. Construction shall only occur as follows:
Unless otherwise approved by Council, excavation, demolition, construction or subdivision work shall only be permitted during the following hours:
 - a) 7:00 am to 5:30 pm, Mondays to Fridays, inclusive (with demolition works finishing at 5pm);
 - b) 8:00 am to 1:00 pm on Saturdays with no demolition or excavation works occurring during this time; and
 - c) at no time on Sundays or public holidays.

Activities generating noise levels greater than 75dB(A) such as rock breaking, rock hammering, sheet piling and pile driving shall be limited to:

8:00 am to 12:00 pm, Monday to Friday; and
2:00 pm to 5:00 pm Monday to Friday.

The Proponent shall not undertake such activities for more than three continuous hours and shall provide a minimum of one 2 hour respite period between any two periods of such works.

“Continuous” means any period during which there is less than an uninterrupted 60 minute respite period between temporarily halting and recommencing any of that intrusively noisy work.

As discussed above, it is requested that the applicant withdraw the current application and address the above concerns in further studies and revised scheme. If this application is pursued, it is requested that the Department meet with residents of Greenwich to discuss the proposed assessment and pursue to **refuse the application**.

Thank you for consideration of our concerns,

Rachel & Ben Waller