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# Lane Cove Bushland & Conservation Society Inc

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P.O Box 989, Lane Cove NSW 1595

ABN 50 518 833 556

Email: [lanecove\\_bushland@yahoo.com](mailto:lanecove_bushland@yahoo.com)

Web. [www.lanecovebushland.org.au](http://www.lanecovebushland.org.au)

26<sup>th</sup> August 2019

The General Manager,  
Lane Cove Council.

Att Henry Burnett

## **DA 103/2019, Residential Aged Care Facility, 33 Greenwich Road Greenwich**

Thank you for allowing submissions on this site now that a new Development Application has been submitted. This new building will provide a much better environments for residents than the approved DA would have provided. It is lower than the original and in part be less dominant, particularly in colour.

However, it has a greater site coverage with less area for landscaping and it exhibits greater frontage to Greenwich Road (approx. 57 m) and River Road (approx. 30 m)

We would like to comment on a number of areas in the documents.

### **Ground works**

The Geotechnical Investigation Report shows that the majority of the excavation will be within a shale belt, with sandstone between 1 and 6 m below the basement level. Shale is porous and allows water to penetrate through it to lower levels. The report also shows the water table at approx. 1 m above the basement level. In so reporting they say there will be no impact on the landscape areas. This wrong as it ignores the sub-surface water which tracks down the site to the west and onto the houses in Stella Vista Place, feeding that vegetation.

This cut-off water must be replaced in the stormwater design so that there are no detrimental effects on the vegetation below this building on its own site or that of the adjoining houses.

There is no information on the levels of the OSD tank, but if the outlets are to River Road within this site it must be close to ground level which will again affect the sub-surface water flows as well as the depth of soil on top for landscaping.

There is no water recycling tank to collect water from the roof and balcony area for reuse in toilet flushing and or landscape watering. This omission should be rectified in conditions in any approval.

Sediment control is a must on a site with this slope. It must be correctly installed, regularly maintained and cleaned. The Arborist Report has requirements for the buried section near vegetation and these requirements should be conditioned in any approval.

## RECOMMENDATIONS.

1. Require a design that allows sub-surface water to continue flowing to lower areas.
2. Provide a water recycling tank and use this water in the development
3. Ensure sediment controls are in place and maintained for the duration of the demolition and construction period.

### **Landscaping**

There are a large number of trees to be removed (42 requiring approval and 13 not requiring approval) out of 93 on the site or close by in adjoining sites, many of which are canopy trees. 33% of trees on site will be retained and all trees on adjoining sites will be retained. Those retained must be fully protected, including canopies from any craneage work or overhead concrete pumps. The protective conditions outlined in the Arborist report must be included and monitored.

The plant lists in the Landscape Plans show mainly exotic rather than native planting and this must be rectified in the approval. Native planting will give as much colour and vibrancy as many of the exotic species shown as well as not requiring the use of as much water for their maintenance. In particular we cannot see how European olive trees can be justified as the main tree on the roof level. Some exotics may be the only species viable in shady areas but should not be the dominant vegetation.

The landscape plans show few canopy trees are being replaced and these are basically one species. There is a need for large trees, particularly along Greenwich and River Road frontages, to be included in the landscape plans. All trees and larger shrubs should be indigenous or at least native to the upper north shore.

The documents claim 46% of the site as landscaped area on the ground, but this includes areas that are hard paved in courtyards and walking tracks so that 46% is incorrect. There is no indication of the area of deep soil planting. The protrusion of the basement levels, sub-station and OSD tank will exclude some areas from deep soil planting.

## RECOMMENDATIONS

1. Condition protective measures as outlined in the Arborist's report for all vegetation including protecting canopies from crane use.
2. Use more indigenous and native species in the landscaping.
3. Replace more canopy trees along Greenwich and River Roads.
4. Ensure that the landscaped area complies with the codes- particularly deep soil areas.

### **Sustainability**

There is no mention at all of sustainability in any of the documents. We would like to see conditions that require solar panels (and batteries if possible), water reuse as mentioned earlier and minimum water use for all fittings and LED lighting throughout, together with any other sustainable actions that can be taken. Minimum carbon imprint should be required for all materials used in the building.

This would align with Councils concerns about climate change and its effect on the well-being of the residents in the municipality and this development.

## RECOMMENDATION

Greater sustainability measures are taken in the planning and materials used in the building.

## **The building**

As mentioned in the introduction, the building will be an improvement to the visual and environmental amenity of the site and the neighbourhood. It does have areas that need resolving – height and façade length being two such areas.

The GFA as measured under the Seniors Housing SEPP allows large areas not to be included in the calculable area. There appears considerable areas in basement 1, and smaller areas on other floors, that are not included, which if included would bring the FSR to well above the allowable of 1:1, This should be reviewed to see if any of these areas should be included in the GFA.

Many of the resident's rooms will receive no sunlight for a greater part of the year. Looking generously at the rooms facing onto the central courtyard, there is still over 41 of the 92 units that will not receive any sunlight during the winter months. Is this acceptable in this type of accommodation?

The only common area receiving winter sunlight is on the ground floor. More sunlit areas should be provided on levels 1 and 2.

Some small “conversational” sitting areas should be provided on each of the occupied floors. Visitors, and residents themselves, require these areas for quiet and private conversations in lieu of having to sit in the common lounge areas or their own rooms. This should be a requirement in any approval.

There is no indication of either supply air or exhaust air ducts to the carpark, laundry and kitchen rising through the upper floors or where they will discharge to the open air. They could be a problem if they discharge at the habitable roof area and are not correctly designed.

The north facing courtyard at the ground level will be set well below natural ground level and close to River Road. This may produce an unhealthy environment from the roadway as well as limiting the sunlight in winter.

The parking numbers do not discuss the peak staff parking at shift change over and this should be more fully investigated to ensure there is not undue use of visitor parking at those times.

## **RECOMMENDATIONS**

1. Check the application to vary the height and break the length of the Greenwich Road façade to be more in keeping with the local environment.
2. Check the omissions from the GFA to see if any have been misrepresented.
3. Provide more residents rooms with sunlight -s a minimum set out in SEPP 65
4. Provide small conversational spaces on each level.
5. Ensure mechanical services do not impinge on the amenity of the resident's use of public spaces.

## **Conclusion**

The LCB&CS commends the change from the additions and alteration of the existing building proposal to this new demolition and construction of a new building. We see there are many advantages in this new building but there are still a number of outstanding issues that need to be resolved before any approval is granted.

We hope that the points that we have raised and the suggestions that we have made in this submission can be taken into account in the assessment of the application.

Doug Stuart for the Committee,  
Lane Cove Bushland and Conservation Society Inc