



Lane Cove Bushland & Conservation Society Inc

P.O|Box 989, Lane Cove NSW 1595

ABN 50 518 833 556

SSD-8699 Development of the Greenwich Hospital site, River Road, Greenwich.

The Lane Cove Bushland and Conservation Society has been advocating for the environment for the last 48 years, both supporting and challenging authorities on plans that impact on the environment. We are a respected community group in our local Council area, having representatives on Council Advisory Committees.

Although we appreciate the changes and improvements made to the proposed development of the Greenwich Hospital site, we have highlighted recommendations in this Submission and maintain the following reservations.

Seniors Living Component:

We cannot agree that Seniors Living fits the description of 'ordinarily incidental or ancillary to Health Care Facilities'. Seniors Living is purely accommodation for people of a certain age and is part of the business model HammondCare requires.

HammondCare maintains that they have minimum GFA and design requirements in order to ensure the viability of the operation. Nearly half the total GFA will be for Seniors Living, ie 52.7% for traditional hospital purposes and 47.3% for Seniors Living. HammondCare states that reducing the height/scale of the scheme would result in an inefficient low-rise development with a high site coverage and removal of more trees.

HammondCare also maintains that these units cannot be strata subdivided for individual sale but are to be leased. Is there an operational plan for the Seniors Living component? Does this make the accommodation temporary or permanent for the residents? Is there anything preventing HammondCare from applying for strata subdivision in the future?

Few of the requirements for higher density living are met: the units are not close to shops and the only public transport is at best an hourly bus service which does not run late at night or on Sundays and public holidays. The major health facilities at St Leonards are not serviced by public transport from this site.

We object to any plan to subdivide the land or to give separate title for the apartments as this would prevent the hospital expanding over that land in the future.

The Seniors Living units and villas component of the proposal should be deleted from the consent proposal as *it is contrary to the current zoning for the site*. The site should continue to be preserved for use as a Hospital as per the current zoning. Because of this residential component, the proposal does not qualify as State Significant.

The Respite Clinic

Accessibility and parking for the respite clinic would be difficult for outpatients and should be better located in relation to the other health services.

Traffic:

HammondCare must envisage an increase of activity in the new hospital complex which will involve more traffic, especially as the bus service is inadequate. As a result we consider that the Traffic and Parking Impact Assessment submitted with the original application has understated the potential adverse impacts on the surrounding public road network.

Visual Impact:

The visual impact on residents in Greenwich and Northwood is also understated and sample views do not take into consideration the loss of tree canopy after construction is completed. There would be an impact on Greenwich Primary School opposite as the hospital tower overlooks the school.

Protrusion above the canopy of the ridge of any of the multi-storey buildings on this site will negatively impact the views from Bob Campbell oval and the seclusion in the reserve. With all these impacts, the bigger the building, the greater the impacts, and while the bulk and scale of the proposed buildings has been amended, they are still unacceptably large for this location.

Setbacks:

The apartments and hospital must comply with setback requirements from River Road and maintain the current street amenity, with mature trees and canopy. The lower level of the apartments were previously non-compliant (shown at 5.0 m), the terrace to the hospital podium (at the most 2.0 m) and the podium above (about 7.0 m). **The prevailing setback in Lane Cove DCP 3.5 requires a setback of 7.5m in line with adjacent residential setbacks. This would allow deep soil planting for trees that would soften the visual impact of the hospital tower, particularly in the direction of Greenwich Primary School opposite on River Road. Currently there are mature trees between the buildings and River Road.**

Landscape:

The extent of the Asset Protection Zone required and bushfire risk should be clarified.

Further design work needs to be provided by the design team to demonstrate that basement and sub-soil structures will not impact the root zones and endanger existing trees, particularly heritage trees near Pallister House. Basement construction proposed near the heritage building must be at least 3m from trees. Parking, both above ground and below ground close to Pallister House, may have a detrimental effect on sub-soil water movement now sustaining trees and vegetation.

Further design work needs to be provided by the design team to demonstrate this has been considered.

Trees

The proponent's report incorrectly states that there will be a net increase in the number of trees. It is unlikely that retaining the trees to the boundary areas will be sufficient to ameliorate the loss of canopy, necessary to retain a wildlife corridor.

Removal of locally indigenous trees and stands of remnant bush which include some of the mid and ground story species is to be deplored and avoided at all costs. These represent important components of Lane Cove's history and heritage. **The overall loss of trees (any species) will still result**

in immediate major habitat impact on habitat (for birds, bats, arboreal mammals etc), with loss of nesting hollows, perching places, food sources etc.

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. Further redesign of the hospital may save some of these trees while moving the respite facility to the location of the seniors living blocks would save four trees in the current location and avoid the fragmentation of this bush pocket.

The nature of replacement plantings.

A primary aim of the current Lane Cove LEP (2009) is '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. The site has the potential to make a very valuable contribution to local bushland character and to provide an extension to the bushland habitat of the nearby reserve.

The Arborists Report notes for removal of trees from the Hospital development, as 'Remove & replace with new plantings as per Landscape Plan'. However, there is presently no Landscape Plan. 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 their retention around boundaries to 'soften edges and screen buildings'. This means we cannot be guaranteed that native trees lost will be replaced with similar species nor that the development will result in an overall improvement in the site's contribution to the bushland character of Lane Cove or create greater harmony with the bushland reserve on its boundary. 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 Landscaping should apply across the site. It is essential that all new replacement trees must be of locally indigenous species as per Council's DCP Part J.

It is important that the landscaping requirements (except for the Pallister House heritage garden) are for advanced indigenous tree specimens with adequate care regimes embedded in planning for this site from an early stage – it should be part of any concept proposals.

Key strategies to ameliorate impact are to stage the development and the tree removal, and to replace the trees as soon as possible with advanced specimens, including excellent post-planting care to ensure these replacement trees thrive. These requirements must be included in any planning for trees and landscaping.

Bushland

There are two areas of concern regarding bushland:

1. Preserving the bush remnants on site in the eastern (St Vincents Road) part of the site
2. Protecting the site's bushland edge and the reserve slopes below on the west of the site

1. Eastern Bush Remnants on Site

These are better protected under the new proposal as there is no longer any building in the southern (south of the access road) of two bush patches. **There must be a commitment to appropriately maintain, regenerate and look after this bush area.**

The three-storey respite facility will significantly impact the patch north of the access road, removes trees and almost cuts the patch into two even smaller fragments, particularly once paths and other exterior paving is added. This disrupts the connectivity corridor to the nearby bushland identified in the ecological report (Appendix N1), important for wildlife.

2. The Bushland Edge and Reserve Slopes to the West

The development site includes some bushland on its western edge adjacent to a bushland reserve, the slopes above Bob Campbell Oval. Impacts here may be of two types: construction impacts and ongoing impacts.

Construction Impacts

Given the steep slopes, both on the proponent's land and below into the reserve, the construction impacts on the bush below (both on-site bush and in the reserve) of demolition of existing structures and subsequent building of a raised road and podium for the seniors ILU blocks above such a slope are likely to be considerable (and it is not clear how much this is scaled back, if at all, in the new proposal). 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 still likely even if all this is in place (which is rare for building sites).

Long-term impacts

Stormwater and drainage: While plans to deal with the increase in impervious surfaces and consequent stormwater generation have been addressed in this development, the loss of water to bushland slopes has not. Carving 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, resulting in eventual tree death.

Shadowing and light shedding: The shadow diagrams still indicate some increased shadowing to the bushland in some seasons. Along with night light from the completed seniors ILUs these could be predicted to impact on both vegetation and animals.

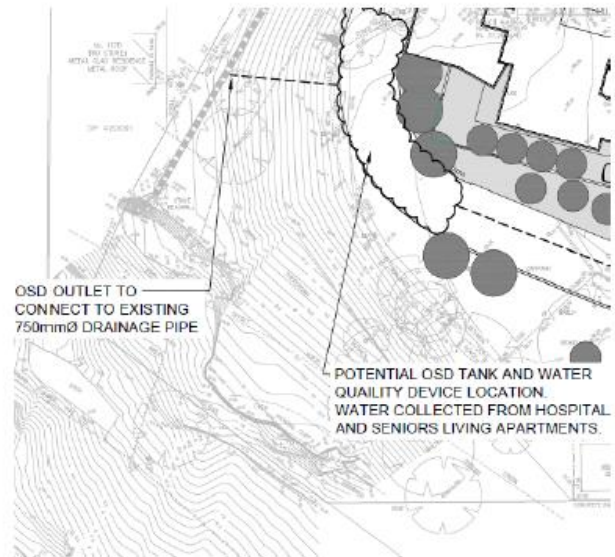
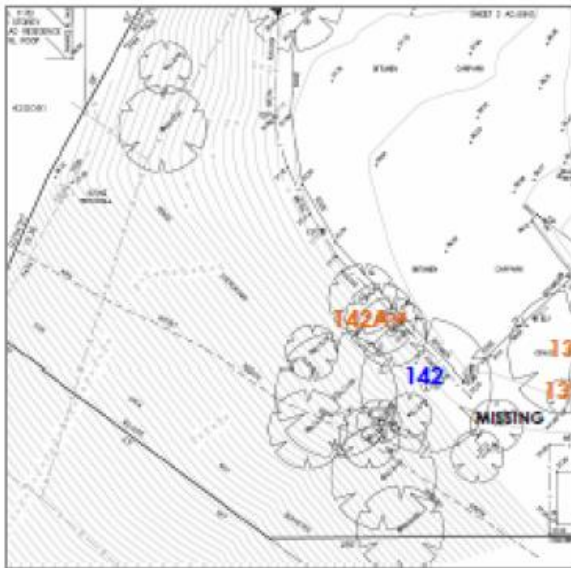
Heritage Assessment:

The Report makes findings based on EIS drawings which are misleading as have misrepresented the height of Pallister House roof, gutters and trees, as Pallister House roofline is inflated - higher than it is in relation to the hospital, as shown in drawing S 03/T3 used in the Heritage Report. **Therefore, the conclusions drawn are inaccurate.**

Discrepancies in the depiction of same site area (next page)

We are concerned that an Assessment cannot be believably made with documents that display different versions:

South & S-West Boundaries, site Bushland, extg Carpark/New Access road; NB omission by Arborist, Surveyor, Landscaper of a large number of trees and the landforms.



Above - discrepancies in the depiction of same site area:

L: Extract p58 of the Arborist Report shows 'interpolated' contours, "Area Not Surveyed", an absence of detail and ignores most existing trees.

R: The Civil Engineering Plan shows the details of contours which accord with reality.



Above - Documents Displaying Different Versions

L: EIS ignores many trees which exist in S-W site corner as in Six Maps Aerial view;

R: The Landscape Plan has ignored the existing topography, bushland and trees and used the inaccurate "area not surveyed" version of contours and trees.

As will be clear from this detailed analysis, the priority of Lane Cove Bushland and Conservation Society is to preserve the natural amenity of the Lane Cove – Greenwich area. The proposal from HammondCare for the Greenwich Hospital sight should be re designed in the light of the details and problems identified before approval for development is granted.

Shauna Forrest (President)

on behalf of the Lane Cove Bushland & Conservation Society.