

Our ref: Greenwich Hospital Redevelopment - Detailed Design (SSD-13619238) and
Redevelopment of Greenwich Hospital (Concept) Modification 1 (SSD-8699-Mod-1)

Mr Stephen Barry
Planning Director
Office of the Independent Planning Commission NSW
Suite 15.02, Level 15
135 King Street
Sydney NSW 2000

5 February 2024

Subject: Response to Greenwich Hospital Redevelopment Stage 2 (SSD-13619238 and SSD-8699-Mod-1) Department Stakeholder Meeting – Questions on Notice

Dear Stephen

I refer to your correspondence, dated 29 January 2024, and the Commission's request for further information for the subject applications, regarding:

- a) *further detail regarding the intention of licensing or lease arrangements, noting paragraph 39 of the Commissions' Statement of Reasons for SSD 8699 dated 10 November 2020;*
- b) *confirmation as to whether the Site is intended to be used by people with a disability who are not a 'senior' as defined in the recommended consent, and if so, if any recommended conditions of consent require amendment;*
- c) *clarification of required energy targets applicable to each component of the Site (e.g. seniors living, hospital, respite and Pallister) including BASIX, Green Star, NABERS and Section J requirements; and*
- d) *further information (also requested of the Applicant) regarding further detail of the Department's assessment of the safety of staff travelling to and from the Site including consideration of walking/cycling routes from Wollstonecraft and St Leonards Train Stations, specifically;*
 - a. *consideration of topography and any potential difficulties traversing the routes;*

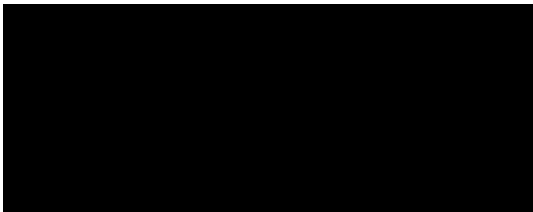
Department of Planning, Housing and Infrastructure

- b. *safety at night time, including at shift change over times after the local bus route ceases to run; and*
- c. *confirmation of current timetable start and end times for the bus route that services River Road and the proposed staff shift times.*

The Department has provided information in response in **Attachment A**. This response also takes into consideration additional information dated 2 February 2024 provided by the Applicant, which is available at **Attachment B**.

Please do not hesitate to contact Megan Fu, Principal Planning Officer on 9274 6531 if you have any further queries or require any clarification regarding the response.

Yours sincerely



Karen Harragon
Director
Social and Infrastructure Assessments
5 February 2024

Attachment A

a) *licensing or lease arrangements.*

The Department notes paragraph 39 of the Commissions' Statement of Reasons for SSD-8699 Concept proposal for the Redevelopment of Greenwich Hospital dated 10 November 2020 identifies community concerns regarding long-term leases for seniors accommodation potentially hindering future redevelopment of the site or change of use of seniors buildings to hospital. Whilst the Commission's concerns were noted in the Statement of Reasons, no additional future assessment requirements were incorporated into the conditions of consent for SSD-8699.

The Department supports the proposal for seniors housing use on the site and notes the adaptability of the seniors housing buildings.

The Applicant has stated in its Environmental Impact Statement for the project that:

"HammondCare provides accommodation to its residents under the auspices of the Aged Care Act 1997 (Commonwealth) and the Retirement Villages Act 1999 (NSW) as well as under standard Tenancy Agreements. None of the accommodation provided is owned by the person residing in it, with the ownership residing with HammondCare."

The Department understands that under *Aged Care Act 1997 (Commonwealth)* accommodation is provided through residential agreements and housing under the *Retirement Villages Act 1999 (NSW)* and standard tenancy agreements would be in the form of leases.

While the Department notes the Commission's concerns regarding potentially restricting future expansion of the hospital use, the Department considers it unreasonable to dictate the commercial arrangements for housing given the acceptance of use of that part of the site for seniors housing as part of the SSD under consideration. It is not standard planning practice to dictate commercial arrangements.

The State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (Seniors Housing SEPP) requires a condition restricting the user type to be registered against the title of the property and a condition has been recommended to this effect. Furthermore, given the differing environmental impacts of the two uses raised by the Department in its assessment (hospital vs seniors housing as proposed), the Department has also recommended a condition requiring that the seniors housing

buildings only operate as such unless further development consent is obtained to change the use. Any commercial arrangements for use of the housing would be managed at that point.

Furthermore, the Department considers that providing housing certainty for seniors is appropriate until any change of use of this part of the site is proposed and approved.

- b) *confirmation as to whether the Site is intended to be used by people with a disability who are not a 'senior'.*

The Applicant has not sought to provide housing for people with a disability that do not meet the seniors category. The Department's recommended condition uses the standard wording from the clause identifying persons to which the Seniors Housing SEPP applies, which includes seniors and people with a disability. The condition is recommended in accordance with that stipulated in the Seniors Housing SEPP. The Department recommends a revised condition to clarify this with the words to be added shown in **bold and underline** and words struck out as follows:

E11. Prior to the occupation of Stage 3, a public positive covenant under section 88E of the *Conveyancing Act 1919* naming Council as the prescribed authority, which can only be revoked, varied or modified with the consent of the Council, must be registered on the title of the land to which this development consent applies, stipulating that Stage 3 of the development is only permitted to be occupied by persons **defined detailed in the State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004** as follows:

- (a) seniors or people who have a disability;
 - (b) people who live within the same household with seniors or people who have a disability; or
 - (c) staff employed to assist in the administration of and provision of services to the residents on the site.
- c) *clarification of required energy targets applicable to each component of the Site.*

The project is committed to:

- achieving a 4 star equivalent Green Star rating (with the main hospital building targeting a minimum of 53 points under that tool).

- compliance with BASIX Certificate with an energy rating of 41 and a water efficiency rating of 48 for the seniors housing buildings.
- achieving an 8 star NatHERS rating for the seniors housing buildings.
- exceeding the deemed to satisfy requirements of Section J of the NCC for the main hospital building and seniors housing buildings.

As part of its assessment, the Department identified that the above ecologically sustainable targets appear not to extend to the respite building or Pallister.

The Department recommended conditions requiring:

- the seniors housing buildings comply with the BASIX certificate.
- a 4 Star Green Star rating.

The Department notes that the wording in the recommended conditions does not specify to which part of the development the 4 Star Green Star requirement would apply. The intent of the condition is to apply it to both the main hospital building and the respite building (i.e. hospital components of the development), as BASIX only applies to the housing components of the development. As such the Department has recommended a revised condition with additions shown **bold and underlined** as follows:

- C11. Prior to the commencement of construction of Stage 2 **and Stage 4**, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate that Ecologically Sustainable Development (ESD) is being achieved by either:
- (a) registering for a minimum 4-star Green Star rating with the Green Building Council Australia **for the main hospital building and respite building (as relevant)** and submit evidence of registration to the Certifier; or
 - (b) seeking approval from the Planning Secretary for an alternative certification process.
- F16. Unless otherwise agreed by the Planning Secretary, within six months of commencement of operation **of Stage 2 and of Stage 4 respectively**, Green Star certification must be obtained demonstrating the development **for each Stage** achieves a minimum 4 star Green Star Design & As Built rating. If required to be obtained, evidence of the certification must be provided to the Certifier and the Planning Secretary **within six months of operation of the relevant stage**. If an alternative certification process has been agreed to by the Planning

Secretary under condition C11, evidence of compliance of implementation must be provided to the Planning Secretary and Certifier **within six months of operation of the relevant stage.**

The Department has not recommended any conditions regarding sustainability targets for Pallister given the heritage significance of the item and minimal works being undertaken in relation to this building, being primarily works in the conservation schedule.

d) *safety of staff travelling to and from the Site, including consideration of walking/cycling routes from Wollstonecraft and St Leonards Train Stations.*

- *topography and any potential difficulties traversing the routes to train stations.*

The topography between the hospital and these railway stations makes walking and cycling an unlikely option. The hospital is located outside the walking catchment of St Leonards station and on the edge of the catchment for Wollstonecraft station.

The Department notes that shared paths have been recently constructed by Council in the vicinity of the hospital site including along River Road, which does improve connectivity, but the distance and topography to the closest stations would still deter walking and cycling.

The Department notes access to both these stations is available via the 265 bus route that has stops within the vicinity of the site. This bus route also connects to North Sydney station. Bus route 261 with bus stops located on the River Road frontage also connects the site to North Sydney and Wynyard stations.

- *safety at night time, shift change over times and bus timetable.*

The EIS advised that the facility would continue to operate with three shift change overs: morning, afternoon and evening. The Applicant has further advised that the staff shift times are: 7am, 1:30pm and 9:30pm.

The current first and last pick up/put down times at the bus stops in the vicinity of the site are provided in the following table.

Bus route	Day	Direction	Start	Finish
261	Monday - Friday	City	6:29am	8:35pm
		Lane Cove*	7:45am	7:59pm
	Saturday	City	7:54am	5:45pm
		Lane Cove	8:42am	6:35pm
265	Monday - Friday	North Sydney station	6:04am	5:46pm
		Lane Cove	7:00am	6:48pm
	Saturday	North Sydney station	9:10am	5:10pm
		Lane Cove	9:36am	5:40pm

* Whilst the 261 bus route also stops at Chatswood station, it is only on school days and has not been included above.

Current bus services are generally only available for the morning shift Monday to Friday. The afternoon shift finishes, and the evening shift begins in the night-time period. The Department understand that traditionally staff that work these hours prefer driving. Sufficient car parking, which incorporates Crime Prevention Through Environmental Design principles in its design, is also available for those with shift change overs occurring in the night-time and for staff on Saturdays and Sundays where bus services are also not available at shift change overs.