

2 February 2024

2190376

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

Dear Barry,

GREENWICH HOSPITAL STAGE 2 (SSD 13619238 & SSD 8699 MOD 1) RESPONSE TO QUESTIONS ON NOTICE

This letter has been prepared by Ethos Urban on behalf of HammondCare (the Applicant) in response to items raised by the Independent Planning Commission within the Questions on Notice Letter for SSD 13619238 and SSD 8699 MOD, 1 dated 30 January 2024. It should be read with reference to the following appended documentation:

- Geotechnical Investigation prepared by JK Geotechnics (**Attachment A**);
- Construction Management Plan prepared by Roberts Co (**Attachment B**);
- Civil Section Plans prepared by Van Der Meer (**Attachment C**);
- Deep Soil Diagram prepared by Bickerton Masters (**Attachment D**);
- ESD Report prepared by JHA (**Attachment E**);
- End-of-Trip Facilities Markup prepared by Bickerton Masters (**Attachment F**);
- Schedule of Bedroom and Living Space Sizes prepared by Bickerton Masters (**Attachment G**);
- Rainwater Tank Markup prepared by Bickerton Masters (**Attachment H**);
- Green Travel Plan prepared by TTPA (**Attachment I**); and
- Green Roof & Solar Array Research by UTS, Lendlease and Junglefy (**Attachment J**).

A response to each of the items raised has been provided in the table over the page.

Item	Response
1. Landscaping and Public Domain	
<p>a. confirmation of the soil profile at the Site including the depth of sandstone bedrock and details of the proposed excavation process (e.g., blasting, cutting);</p>	<p>The soil profile for the site is discussed at Section 7.9.1 of the EIS, and the Geotechnical Investigation by JK Geotechnics at Appendix W of the EIS, re-attached at Attachment A. A summary overview is provided below:</p> <ul style="list-style-type: none"> • Asphalt-concrete paved surface accounted for a depth of 10mm to 65mm at several tested borehole locations. • From surface level or beneath the asphalt-concrete paved surface, sandy and clayey fill with varying silt fines and gravel content could be found to depths ranging between 0.3m and 3.4m. • Residual soils were encountered at several borehole locations, and comprised silty clay, sandy clay, or silty sand overlaying silty clay. Where found, residual soils extend to the sandstone bedrock at depths from 0.7m to 1.4m. • The site is underlain by Hawkesbury Sandstone. Weathered sandstone bedrock was encountered at all the boreholes below the residual soils or fill at depths of between 0.3m and 3.4m <p>The proposed construction process is discussed in the Construction Management Plan (CMP) by Roberts Co at Appendix E of the RTS, re-attached at Attachment B. The CMP will form the basis of a detailed Site Environmental Management Plan (SEMP) at construction certificate stage, as is industry standard practice. It should be noted that the construction schedule has been designed to enable ongoing hospital operations throughout construction, and includes mitigation measures to ensure excavation, noise and vibration impacts are appropriately controlled, as confirmed in the submitted Noise and Vibration Assessment.</p> <p>Civil Section Plans have been provided by Van Der Meer at Attachment C which show the soil profile and anticipated excavation methodology across the site.</p>
<p>b. further information regarding the calculation of deep soil zones including:</p> <p>i. confirmation that the existing bushland on the Site complies with the applicable deep soil criteria to the Site; and</p> <p>ii. a plan identifying the deep soil zones on Site</p>	<p>Deep soil at the site has been calculated in accordance with the criteria of the Apartment Design Guide (ADG) which requires:</p> <ul style="list-style-type: none"> • That the soil is not covered by buildings or structures within a development; and • For sites larger than 1,500m² (such as the subject site), the deep soil areas have a minimum dimension of 6 metres. <p>Under the accepted ADG definition, 43% of the site (14,300m²) is deep soil.</p> <p>Importantly, the underlying soil profile (such as the presence of sandstone) is irrelevant to whether or not an area of the site is classified as deep soil under the ADG. The proposed landscaping design has been prepared with full knowledge of the site's underlying sandstone nature, to ensure that the vegetation proposed is viable under these conditions.</p> <p>The existing and proposed deep soil locations are shown in the Deep Soil Diagram prepared by Bickerton Masters at Attachment D. Existing bushland at the site meets the criteria for deep soil on the ADG, which does not discriminate between pre-existing deep soil areas and deep soil areas introduced under a development.</p>

c. further information regarding the calculation of public domain on the Site;

Following review of the Meeting Transcript between the Applicant and the IPC, the comment made regarding public domain in the meeting appears to have been misspoken and is intended to refer to deep soil.

The Deep Soil Diagram prepared by Bickerton Masters at **Attachment D** above confirms that 14,300m² (43% of the site) is to be deep soil.

d. provision of the referenced report for the Barangaroo Project regarding the insulation of planting and soil on the roof.

The proposed PV solar co-location with a green roof is similar to that installed at Barangaroo.

A study by the University of Technology, Sydney with Lendlease and Junglefy comparing the conventional PV solar system on International House, with the combined PV solar and integrated green roof system on Daramu House (in Barangaroo) found that:

- The integrated green roof and solar PV system improved solar energy output by 3.6 percent; and
- With regards to insulation, surface temperatures were greatly reduced on the green roof, in some cases up to 20 degrees in summer.

A copy of the study is provided at **Attachment J**.

2. Sustainability

a. clarification of energy targets being sought for each component of the Site (i.e., seniors living, hospital, respite, Pallister) including BASIX, Green Star, NABERS and Section J requirements;

The project is targeting the following energy targets for each component of the site:

- Hospital building: 4 star equivalent Green Star (Design & As-built v1.3) + Section J compliance.
- Seniors housing buildings: 4 star equivalent Green Star (Design & As-built v1.3) + Section J compliance.
- Respite care building: Section J compliance.

Further detail is provided within the ESD Report at **Attachment E**.

b. comment on the recommended conditions being amended to reflect the Applicant's current targets (e.g., a 5 Star Green Star target) and the proposed amendment to recommended conditions B3 and E5 to require the higher rating of either BASIX or Section J to prevail in the event of an inconsistency;

Although the project is looking to design to a 5 Star Green star equivalent level of performance, the commitment remains at 4 star equivalent Green Star (Design & As-built v1.3) in accordance with the ESD Report (**Attachment E**). It is requested that 4 star equivalent Green Star (Design & As-built v1.3) be reflected in the conditions of consent. Notwithstanding, the Applicant is willing to commit to 5-star NABERS for the project.

Amending conditions B3 and E5 to require the 'higher standard' to prevail is not considered to be appropriate. As not all BASIX and Section J standards are quantifiable, it is not straightforward in determining which one would be the 'higher standard' for each situation. BASIX and Section J apply to different building classifications and are not comparable, as the structure of each sustainability measure is fundamentally different.

Furthermore, Section J is the relevant standard to which the seniors housing buildings have been built to, as it is the sustainable benchmark to Class 9C buildings. BASIX is traditionally only applicable to Class 1, 2 and 4 buildings, and a BASIX Certificate has only been provided at the DPE's request due to a technicality in the former BASIX SEPP. Section J anticipates single building ownership and centralised building services, and the sustainability benefits they can deliver (e.g., heat recovery) are generally not available to Class 2 buildings.

Being Class 9C buildings, the buildings will be required by the NCC to comply with Section J and it is requested that this be the correct standard to be conditioned.

c. a response to SSD-8699 condition B19 which requires a statement regarding how the design of the development is responsive to the CSIRO's projected impacts of climate; and

A response to all relevant SSD 8699 conditions to be addressed under subsequent detailed design applications is provided at Section 5.7 of the submitted EIS.

With regards to condition B19, a response to the CSIRO's project impacts of climate has been provided within the ESD Report by JHA at Appendix JJ of the EIS, re-attached at **Attachment E**. A Climate Risk Assessment is provided at Section 4 of the report. In summary, it finds that:

- *Higher average surface temperature and less rainfall conditions [will cause] an increase in the frequency and/or severity of bushfire events directly damaging the building. This risk is mitigated by ensuring non-combustible building elements are used in the fabric of the building and by implementing good management practice to remove potential fuel source around the building once the building is in operation.*
- *Higher maximum daily temperature and lower humidity conditions [will result in] higher frequency and/or duration of extreme hot days resulting in insufficient capacity of the HVAC system to maintain thermal comfort. This risk is mitigated by the incorporation of passive thermal principles such as appropriate external shades and thermal insulation and by upgrading the capacity of the HVAC system once the current system has reached the end of its service life.*

d. details of the targeted capacity of the photovoltaic arrays

The project is proposing more than 170kW of photovoltaic systems for the two seniors living buildings. Refer to aforementioned ESD Report at **Attachment E**.

3. Architectural Plans

a. an architectural plan including details of proposed end of trip facilities for staff

End-of-trip facilities are located at the eastern end of Level 1 of the shared carpark, as shown in Drawing DD-HST-0100 of the submitted Architectural Plans. For clarity, a markup has been provided by Bickerton Masters at **Attachment F**.

b. detail outlining any differences in the requirements of the Seniors SEPP and Class 9C Building Code of Australia Standards (i.e. for the potential future conversion to hospital), including clarification of the proposed minimum sizes of bedrooms/living spaces for 1, 2 and 3 bedroom apartments; and

It is not intended for the seniors living buildings to be converted to hospital in the future. The seniors living buildings have been built to Class 9C standards (defined as *residential care buildings that may contain residents who have various care level needs* under the National Construction Code), as opposed to Class 9A (*hospitals*). The proposed seniors living buildings are to be for older residents (75+ years of age) with chronic health needs, as part of HammondCare's 'hospital in the home' philosophy. Designing the buildings to Class 9C delivers a higher level of specialised amenity and enables operational flexibility when residents' needs change.

For example, a resident may at some point suffer from an acute health condition that would require them to be provided with a higher level of care for a certain period of time, with this care only being able to be feasibly delivered in a building designed to Class 9C standards.

A schedule of sizes of bedrooms and living spaces for 1, 2 and 3 bedroom apartments in the seniors housing buildings (including minimums highlighted) have been provided by Bickerton Masters at **Attachment G**.

c. details of the proposed rainwater tank for roof runoff and identification of the tank on an architectural plan.

A 160kL rainwater tank is provisioned for to the southwest of the hospital building and east of the southern seniors living building, as shown in Drawing AR-SW-0201 of the Architectural Plans. For clarity, a markup has been provided by Bickerton Masters at **Attachment H**.

4. Safety and Access

Please provide further information regarding the 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;

The proposed development does not seek to alter staff travel arrangements to and from the site from that of the existing hospital. Currently staff use a mixture of driving, cycling, walking from Wollstonecraft/St Leonards, and bus services to get to and from the site.

It is important to note that, the existing transport conditions at the site meet all access provisions of the *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004* (Seniors SEPP) and is outside of the control of the Applicant. To reduce reliance on single-occupancy trips where this is feasible, a Green Travel Plan (GTP) has been prepared for the proposal at Appendix L of the EIS (re-attached at **Attachment I**). The GTP discusses provision of end-of-trip facilities, information on active and public transport links, and incentivising carpooling.

In situations where staff need to drive to work (which would be dependent on the individual circumstances of each staff member), provision has been made for adequate onsite parking for staff including during shift changeover times, above and beyond DCP requirements for 1 space per 2 staff (refer to submitted Traffic and Parking Assessment at Appendix K of the EIS). This is in recognition that there are certain situations where public transport would be unsuitable, and to provide staff members with flexibility in getting to and from the site to best meet their personal needs and requirements.

a. consideration of topography and any potential difficulties traversing the routes;

It is acknowledged that the walk from Wollstonecraft/St Leonards stations includes relatively steep gradients along River Road, although it is understood that existing staff at the site walk to and from the stations as part of their commute. Staff who do not wish to make this walk will have the option of the 261/265 bus services servicing the site, or to drive.

b. safety at night time, including at staff shift change over times after the local bus route ceases to run;

With regards to nighttime safety and travel, the CPTED Report submitted at Appendix FF of the EIS finds the Lane Cove LGA to have a low incidence of crime, with the crime risk rating of the development being "low".

All pathways to and from the site, including to Wollstonecraft/St Leonards stations, are well illuminated with street lighting. Staff who do not feel comfortable walking to the site from the station will have the option to drive or take the bus as needed.

c. confirmation of travel arrangements for staff on Sundays; and

The 261 and 265 bus routes servicing the site do not run on Sundays. Staff will have the choice to walk from Wollstonecraft/St Leonards stations, or to drive.

d. confirmation of current timetable start and end times for the bus route that services River Road and the proposed staff shift times

The 261 services the site between 06:29 – 20:35 (to the city) and 07:32 – 21:59 (to Lane Cove), and the 265 between 06:04 – 17:46 (to North Sydney) and 07:00 – 18:48 (to Lane Cove) weekdays. For Lane Cove-bound services, staff can then transfer to services to the city, Macquarie Park, and Epping. A reduced service is provided on Saturdays.

Staff shift handovers for most staff who undertake shift work is anticipated to occur at 07:00, 13:30 and 21:30 (subject to confirmation at operational stage depending on operational requirements). Staff will have the option to walk from Wollstonecraft/St Leonards or to drive where bus connections are not feasible. It should be noted that many members of staff do not do shift work and have varied/flexible hours.

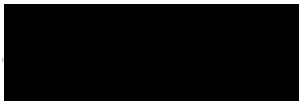
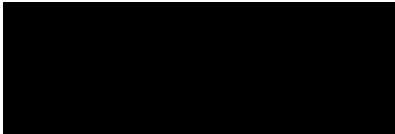
5. Affordable Housing

- a. confirmation of the Applicant's affordable housing targets for this project; and
- b. comment on the potential addition of a condition of consent requiring a percentage of affordable housing on the Site.

HammondCare is a charitable organisation and is committed to supporting people of low or no financial means as part of their core mission. Currently, approximately 40% of aged care residences across HammondCare facilities are fully supported and more than 10% of Independent Living Units benefit from affordable options. Furthermore, 50% of inpatients and outpatients are public patients. Irrespective of this, it is requested that a specific condition of consent is not imposed for operational reasons which may preclude the provision of care based on an individual's financial circumstances. In addition, it is not a requirement under the relevant legislation, including the Seniors SEPP, and the project by its very nature is already delivering substantial public benefit, with HammondCare already choosing to provide affordable housing in alignment with their core mission.

We trust that the above is sufficient to enable determination of SSD 13619238 and SSD 8699 MOD 1. Please do not hesitate to contact the undersigned should you require any further information.

Yours sincerely,




Senior Urbanist


Director

