



**St John of God Richmond Hospital
Redevelopment
SSD-10394**

Response to request for information

On behalf of St John of God Health Care

February 2022

Contact office: Level 5, 9 Castlereagh Street Sydney
NSW 2000

Damian Gibson

M: 04 418 434 992

E: damian.gibson@johnstaff.com.au

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Contributors

Damian Gibson

A handwritten signature in blue ink, appearing to read 'D. Gibson', with a long horizontal flourish extending to the right.

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Introduction

1.1 Preamble

This response report has been prepared by Johnstaff Projects on behalf of St John of God Health Care (the applicant) to respond RFI's raised by agencies & the Department of Planning Industry & Environment for the proposed St John of God Richmond State significant development (SSD-10394). This report also describes minor design changes made to the development in response to submissions and as a result of design development & value management.

Design

1.2 Amended Design

Updated plans are being submitted as part of this RtS report (see **Appendix A & B**). A number of minor changes are proposed as a result of ongoing design development & value management. These changes are described in the table below. The changes are also outlined in the amended drawings.

Table 1.1 DPIE - Response for Information	
Architecture - Proposed changes to the development	
Issue	Response
Façade treatments have changed on some of the building elevations and heights have increased (i.e Garden Pavilion and the rooftop plant). The enclosed mechanical plant between the Residential Pavilions has increased in height and changed appearance in the plans provided since the RtS (sections and elevations).	The design team confirms that the garden pavilion roof line has not increased its RL from the original submitted documents. Garden Pavilion roof change was a client request after a value management exercise. The roof line has changed but the height of the highest point does not change. Note: the Residential Pavilion 4 under-croft façade extends to natural ground level. There are no penetrations through this façade beneath ground floor level. The rooftop mechanical plant has removed from the plans as requested by DPIE.
No internal demolition within Belmont House should be occurring as only minor refurbishment works were requested in the application.	The design team confirms this. Belmont House is having later 1960's/70's dining room additions removed from the rear. The current kitchen serving the dining room is within one of the original Belmont House rooms, and this will be removed including cold rooms, and the room will be turned into a games room for the patients, and 'made good' (light refurbishment). Refer to Appendix A, Part 1d updated on drawing SSK05
The building footprint, roof angle and shape of the Garden Pavilion has changed, and it also appears	The roof line was changed at the clients request as part of a VM exercise. The roof is now a



to now be exceeding the 10m height limit for the site (where as previously it complied). No further changes to the Garden Pavilion have been discussed with the Department since the minor revisions included within the RtS.

traditional gable in appearance rather than two mono pitch roofs. The design team confirms that the RL to the roof ridge has not changed. A small area around the roof apex of pavilion 2 and approximately half of the roof area of pavilion 3 breaches the limit. The breach culminates in a maximum breach of approximately 2.117m at the very southern end of pavilion 4 where the existing land slopes. The final overall size of the dining room and cafe area has reduced in size @ 590sqm total GFA for Garden Pavilion, as part of later design development. Refer to **Appendix A Part 1d, updated on drawing SSK12**

The Administration Building elevations are missing from the elevation plans.

This was an error, and will be issued with updated architectural set. Refer to **Appendix A Part 1d, on drawing SSK15**

The existing switch room, which is now being retained as described in the RtS, appears to have changed shape since the RtS was submitted

The design team confirms that the overall footprint of this building has been reduced. Along with the switch room a further room housed a pump room. During further design development, the need of this pump room was deemed to be surplus to requirements and the building reduced in size accordingly. The remaining structure is to have it's facade made good, and a new roof over to mimic the architectural design of the service link has been incorporated.

The Wellness Centre has changed in terms of its footprint and external treatment (i.e. all of the skylights are no longer included and curved exterior walls are now straight), which is contrary to all rendered imagery previously provided and utilised in the assessment thus far.

The wellness centre location to the boundary was adjusted on the advice of the bushfire consultant to reduce onerous requirements on protection to the façade. This was also considered an improvement by the DPIE Bushfire Consultant. The overall area was also reduced to achieve this. Skylights were removed to reduce requirements for ember mesh over & further improve the overall fire rating to the building. Refer to **Appendix B, Part 1c & Part 2b**

The lounge and kitchen areas in the residential pavilions are no longer shown on the plans. It is unclear why?

Printing error, drawings to be reprinted. Refer to **Appendix A Part 1d, updated on drawings SSK09 & SSK10** for notes delineating areas of lounge & kitchen.

Following RFI was raised by DPIE on August 10th 2021, have queried elevation plans of St Pauls Annex as external changes to the building are proposed in the RtS.

SJG Richmond have repurposed the lower level of St Pauls Annex from a gym to an arts and craft room. As such, and for the comfort of the users, an accessible toilet has been incorporated to the entry way of the building. This will be a light weight structure with a new metal sheet roof.



Visually, this addition to the building is sympathetic to the current design. Above the new metal sheet roof to the accessible toilet fixed glazing will replace existing windows. Note: the existing stair to the upper level of St Pauls Annex is to be retained. Documentation for the new accessible toilet can be found on drawing as part of **Appendix A Part 1d, SSK15**

1.3 DPIE – Landscape RFI

Following a review of information submitted to DPIE, Megan Fu Acting Team Leader Social Infrastructure, a further request to provide an updated tree removal plan and statement to address the additional tree removal resulting from the Wellness Centre realignment.

Table 1.2 Response to DPIE	
Landscape - tree removal update	
Issue	Response
<p>Previous comments made by the Department in relation to the landscaping are still to be addressed. It's acknowledged that there are now 79 trees identified for removal, compared to the 24 described in the EIS. Sound reasoning for the removal of additional trees is to be provided from a qualified arborist, including an assessment of their relative health and significance (high, medium, low) in the landscape.</p> <p>Upon further review from DPIE the additional response information provided on Sunday 30 January 2022 the following matters are requested to be addressed:</p>	<p>Landscape spreadsheet previously provided 15 Nov 2021 is a direct extract from the Arborist Tree Risk Assessment conducted by SJOG in 23 Oct 2019. Trees were identified against this tree risk assessment on the landscape plan and extracted the trees that are nominated to be removed for either the new development or suggested by the arborist. For DPIE information an updated Landscape set of drawings has been provided that correlate with answers provided below. Refer to Appendix C Part 1d_SSDA Landscape Drawings</p>
<p>Clarify how the trees along the south western boundary that were previously proposed for removal can now be retained with no consequential bush fire safety concerns</p>	<p>Trees along the south western boundary are considered low risk trees by the Arborist's tree risk assessment. As noted in the bushfire report, the trees are located outside of the vegetation zones that may pose as a bushfire hazard. The retention of these existing trees has no effect on bushfire. Also noted in the report, vegetation around the site is to be maintained to reduce the impact of bushfire. The Client further reviewed</p>



	the necessity in removing these trees and requested they remain.
Confirm the hectares being removed, specifically for the area of offset	As noted by the BDAR 0.06ha is the overall area of offset and remains the same in the updated information. Upon further review 0.004ha is the tree removal area within the zone area of offset.
Confirm the breakdown of 1.21ha, does this include already cleared land (i.e. existing buildings, driveways), what number in hectares does the tree removal represent.	Confirming 1.22ha includes existing buildings and roads to be demolished for the new development. The following breakdown of areas: Building – 0.42ha Roads & hard surfaces – 0.38ha Tree Removal – 0.42ha, noting canopy cover overlaps with other areas to be cleared.
The tree removal plan annotates 84 trees for removal (inclusive of groups of trees) however there are two trees on the plans which are not numbered and therefore not referenced in the tree removal spreadsheet. Taking this into consideration the total tree removal should represent 90 trees. The two trees that are unidentified, what species are these and why are they not numbered and referenced?	Refer to tree removal mark-up plan and spreadsheet attached to arborist letter. Total of 97 trees to be removed including the previously unidentified tree 223. (note: refer to column denoted: 'Trees in Group', of spreadsheet for tree count), Appendix C Part 2d_SJG RichArborist Tree Assess. & Appendix C Part 3e_SJG Rich_Tree Removal Markup
Confirm if the clump of trees outlined in black along the southern boundary near residential pavilion 12 are being removed or retained. Depending on the outcome, appropriate plans, documents and calculation are to be updated.	The clump of trees are annotated in the tree removal mark up and they are trees 195, 196, 198, 199, 200, 201, 202, 203. Trees 196, 198 and 200 are to be retained. Trees 196, 199, 201, 202, 203 are to be removed due to proximity to the new build. The trees to be removed are also noted in tree removal spreadsheet referencing their species. Please refer to the updated landscape plans, Appendix C Part 1d_SSDA Landscape Drawings



1.4 DPIE – Noise RFI

Following a review of information submitted to DPIE, Megan Fu Acting Team Leader Social Infrastructure, a requested further clarification was sought in an updated Acoustic Report (Assessment of Operational Acoustic Impact) & an updated Acoustic Report (Construction Noise and Vibration Management). Queries detailed as provided in the table below. Furthermore, a letter provided to DPIE in July 2021 from the project acoustic engineers noted the noise criteria for operation and construction activities will be based on a 30dB(A) background noise level. This can be review in **Appendix D Part 1b**. This information was further clarified in email correspondence **Appendix D Part 2b**.

Table 1.3 Response to DPIE RFI

Noise - clarifications

Issue	Response
<p>Provide an updated Acoustic Report (Assessment of Operational Acoustic Impact) which:</p> <ul style="list-style-type: none"> provides noise measurements for logger 1 and 3 to clarify the assessment of the existing background noise levels at these locations. updates the project trigger noise levels to take into consideration a rating background noise level of 30dB(A) at residential receivers due to insufficient noise monitoring information as noted in the RtS. 	<p>Report updated to show results for loggers 1 & 2 (Refer to Appendix D Part 3b)</p> <p>It was agreed that to address the lack of data at the neighbouring properties Stantec will accept and agree that the background noise levels is the minimum recommended by the Noise Policy for Industry ie 30dB(A). Therefore, the noise criteria for operation and construction activities will be based on a 30dB(A) background noise level. (Refer to Appendix D Part 3b)</p>
<p>Provide an updated Acoustic Report (Construction Noise and Vibration Management) which:</p> <ul style="list-style-type: none"> updates the project noise management levels to take into consideration a rating background noise level of 30dB(A) at residential receivers due to insufficient noise monitoring information as noted in the RtS. 	<p>It was agreed that to address the lack of data at the neighbouring properties Stantec will accept and agree that the background noise levels is the minimum recommended by the Noise Policy for Industry ie 30dB(A). Therefore, the noise criteria for operation and construction activities will be</p>



provides noise measurements for logger 1 to clarify the assessment of the existing background noise level at this location.

based on a 30dB(A) background noise level.
(Refer to **Appendix D Part 4b**)

Report updated to show results for loggers 1 & 2
(Refer to **Appendix D Part 4b**)

1.5 DPIE – Building Height RFI

Table 1.4 Response to DPIE	
Building height and Clause 4.6 variation	
Issue	Response
Provide the existing ground level used to calculate maximum building height and Clause 4.6 variation and identify these points on relevant drawings showing the 10m height limit – it currently appears that the 10m height limit of Pavilion 4 aligns with the roof residence height at RL69.710, which results in an exceedance of 4.06m (overall building height of RL73.77 minus RL69.710) rather than 3.4m.	The measurement has since been updated as the breach culminates in a maximum of approximately 2.117m (or 21%) at the very southern end of pavilion 4 where the existing land slopes. This has come about as a result of residential pavilion 4 being rotated to align with the Bushfire Report noting that the building will be situated no closer than existing buildings to the flame zone. Important to note that the buildings have not been altered in height and not pose any additional amenity impacts. Refer to Appendix A Part 2b - Clause 4.6 Variation_Updated Report - Figure 3: East elevation pavilion 4 which clearly articulates levels.

Response to public authorities

1.6 Heritage NSW - RFI

Response to Submission comments for St John of God Richmond Hospital Redevelopment, from Heritage NSW, recommends to DPIE that a revised report which includes an assessment of heritage impact is provided as per correspondence issued 14 July 2021. A further request from Heritage NSW in November 2021 for a more detailed research was raised have been outlined in the table below

Table 1.5 Response to Heritage NSW
Heritage - Archaeological Assessment



Issue	Response
<p>Heritage NSW issued comments 14 July 2021 whereby they noted the Biosis HAA needed to further identify specific locations for the known historic occupation of the site, which dates from c1810 with the initial land and building of the original Bell family homestead. Heritage NSW did note the assessment was of significance is strong on historic themes and values such as historic or associational criteria, but was less clear or definitive around the archaeological values of the place, noting in several instances that if historical archaeology survives within the development site, that it may be of local or State significance</p>	<p>Biosis went about updating the HAA and reissued their report as documented in Appendix E Part 1b_SJG Richmond_HAA.FIN02. at the end of August 2021. It identified two areas of archaeological potential within the study area associated with the 19th century occupation of Belmont. These relate to the original homestead of Belmont, which contained Bell House, offices and outbuildings, and also the stables and coach house. The Bell stables and coach house was later incorporated into the 1890s stables, part of which is still extant today and is used and maintained by the St John of God Hospital. The historical background indicates that convicts were assigned to Archibald Bell to work the land according to the 1822 General Muster. While they may have been used to build Bell House the historical records do not specify this, nor are there any maps or plans which indicate convict campsites or quarters were within the study area. These convicts may have been located anywhere on the 200 acres they were assigned to work. This large area, combined with the lack of documentary evidence of convict camps or related infrastructure within the study area indicates the potential for archaeological remains associated with convicts to be low.</p>
<p>Further to the feedback from Heritage NSW noted above comment was provided on the 11 November 2021. Heritage NSW confirmed that the SJG Richmond site does not contain any State Heritage Registered listed items, however, the site contains potential for State significant archaeological relics associated with the early phases of occupation of the historical Belmont Estate. Heritage NSW requested the project further demonstrate a clearer understanding of the location of the archaeology relative to the development and demonstrate that the State significant archaeology does not survive in areas of impact and would not be impacted upon.</p>	<p>Following the feedback from Heritage NSW, Biosis went about providing research on the HAA previously issued. The revised HAA Appendix E Part 2b_SJG Richmond_HAA.FIN03. has further reinforced the identified two areas of archaeological potential within the study area associated with the 19th century occupation of Belmont. These relate to the original homestead of Belmont, which contained Bell House, offices and outbuildings, and also the stables and coach house. The Bell stables and coach house was later incorporated into the 1890s stables, part of which is still extant today and is used and maintained by the St John of God Hospital.</p>



1.7 DPIE – Rural Fire Service RFI

A letter from Ms Megan Fu, Acting Team Leader Social Infrastructure Team from the NSW Department of Planning Industry and Environment (DPIE) dated 16 July 2021 was issued to the project team regarding the response to agency submissions for the State Significant Development of the existing St John of God Richmond Hospital.

The NSW Department of Planning Industry and Environment (DPIE) requested additional clarifications on 24 September 2021 requesting further bushfire matters to be incorporated into the final documentation for the State Significant Development of the existing St John of God Richmond Hospital

This request for additional bushfire information is detailed in the table below.

Table 1.6 Response to DPIE	
Bushfire Clarifications	
Issue	Response
requested SJG Richmond provide emergency evacuation information.	<p>The Richmond Hospital Emergency Response Plan (August 2021 v4) incorporates the Fire Safety Management Plan. The Emergency Response Plan is compiled in accordance with Australian Standard AS 4083 – 2010 Planning for Emergencies – Health Care Facilities. AS 4083-2010 states the health care facility shall have emergency plans, appropriate documentation, staff, and training in order to cope with internal and external emergencies as they arise. It is the intention of Richmond Hospital to provide all necessary resources in order to meet the requirements of this standard and any other relevant documents. As directed by AS 4083-2010, and AS 3745-2010 Emergency Control Organisation and Procedures for Buildings, Structures and Workplaces, the focus will be on prevention, preparedness, response and recovery. The Emergency Response Plan is relevant for all employees of Richmond Hospital, and any other relevant settings pertaining to the Richmond Division. It covers all aspects of emergencies including bushfire, fire/smoke response, bomb threat, personal threat, environmental and medical emergencies.</p> <p>The Emergency Response Plan has a section for bushfire that outlines the actions and response including evacuation off site. The Richmond Hospital Emergency Response Plan meets the requirements of the RFS document: A Guide to</p>



requested further detail of existing vs proposed building layouts demonstrating a better outcome.	Developing a Bush Fire Emergency Management and Evacuation Plan. (Refer to Appendix F Part 1b)
	<p>The determination of what constitutes a “better bushfire outcome” is not specified in criteria within PBP and is a somewhat subjective requirement relying on the approach of the Level 3 BPAD practitioner working in collaboration with the design team to come up with a reasonable and balanced outcome that reflects the risk for the site and which provides for a better bushfire outcome than currently exists on site. The deliberation and design associated with the proposed development has been worked through since late 2019 to provide the best outcome for the site in relation to bushfire issues. To assist with the determination of the application, the objectives outlined within PBP have been used that apply to existing SFPP development. The following is provided in response to the request for additional information letter from Ms Megan Fu, Acting Team Leader Social Infrastructure Team from the NSW Department of Planning Industry and Environment (DPIE) dated 16 July 2021 regarding the response to agency submissions for the State Significant Development of the existing St John of God Richmond Hospital at 177 Grose Vale Road, North Richmond, 2754</p> <ul style="list-style-type: none">• provide an appropriate defensible space• site the building in a location which ensures appropriate separation from the hazard to minimise potential for material ignition• new buildings should be located as far from the hazard as possible and should not be extended towards or situated closer to the hazard than the existing buildings• ensure there is no increase in bush fire management and maintenance responsibility on adjoining landowners without their written confirmation• ensure building design and construction enhances the chances of occupant and building survival;



- provide for safe emergency evacuation procedures including capacity of existing infrastructure (such as roads).

These matters were discussed in an online meeting with DPIE and the St John of God team on Wednesday, 4 August 2021. The project team have previously responded to a request for additional information from the RFS on 6 April 2021. In this request, the RFS did not raise concern with Residential Pavilions, Garden Pavilions as the RFS accepted a lower bushfire risk and the nature of the redevelopment being redevelopment of the existing facilities which makes the application infill Special Fire Protection Purpose (SFPP). The RFS acceptance of the site as low risk is reiterated in the letter of 28 July 2021 which states:

The site is exposed to low risk in terms of bush fires and the proposed works can be considered as SFPP infill development.

As the redevelopment within the site is agreed by the RFS as being 'exposed to low risk in terms of bushfires', the design team have taken a conservative risk-based approach in accordance with Planning for Bushfire Protection 2019 to provide a better bushfire risk outcome with the redevelopment than currently exists on site.

The Bushfire Assessment Report for St John of God Hospital redevelopment, North Richmond by Blackash Bushfire Consulting dated 20 February 2020 (and as modified 4 May 2021 to address RFS issues) (Bushfire Report) identifies that the hospital is existing and is infill SFPP development and should be used as the basis of assessment by DPIE. (Refer to **Appendix F Part 1b**)

provide possible alternate locations for residential pavilions 3 and 4.

The buildings have been located having regard to the infill provisions within PBP. Following consultation with DPIE, Pavilion 3 & 4 has been repositioned to be no closer to the hazard than the existing building line.

The buildings have been located as far from the hazard as possible and have not been extended towards or situated closer to the hazard than the existing buildings.

(Refer to **Appendix F Part 1b**)

include details of safe refuge on site.

The safe refuge is provided within the Garden Pavilion which is at BAL 12.5 (in accordance with



the determined BAL levels for the building. There is no requirement in PBP or AS3959 to provide this building as BAL Flame Zone. This condition is not in keeping with the bushfire risk or the determined BAL at the building. The dining area which is intended to be used as the refuge will be fire isolated with in a two hour fire rated compartment and therefore fire separated from the remainder of the building. However, it must be noted that the refuge is provided as a redundancy and the primary response in the event of fire is to evacuate the site to alternative locations.

(Refer to **Appendix F Part 1b**)

buildings within the flame zone are to be built in their entirety to flame zone building requirements.

The PBP 2019 does not provide for the construction standards for buildings. Construction requirements are presented through the Building Code of Australia (BCA) which uses the Australian Standard for Construction of Buildings in Bushfire Prone Areas (AS3959) as providing the acceptable solutions or deemed to satisfy provisions for new construction. The AS3959 requires the determination of the highest BAL affecting a building. Importantly, the AS3959 (section 3.5 of AS3959 2018) provides for the reduction in building construction requirements due to shielding.

The Bushfire Hazard Assessment and subsequent documentation provided a performance-based report supporting the application. The performance-based application determined the BAL for all buildings and recommended that the construction levels be reduced commensurate with the low risk and as provided for within the AS3959. The rear (non hazard side of the buildings) sides of the buildings are not exposed to a bushfire fire source feature and the BAL assessment within the BHA, steps the construction levels down commensurate with the risk and shielding provided to the buildings.

The condition that DPIE are seeking to impose is above the AS3959 and adds significant cost to the project for no net gain.

Similarly, the Garden Pavilion is significantly removed from the low bushfire risk and is within BAL 12.5 as demonstrated in the BHA. The condition to unduly require this building to be



	<p>upgraded 4 BAL levels above the actual BAL is unreasonable and not in keeping with PBP or AS3959.</p> <p>The design team also wishes to note that the new buildings will be built in accordance with the Building Code of Australia (BCA) which will provide internal fire protection above the requirements of AS3959 and PBP. The internal fire detection, suppression and fire safety provisions will complement the external construction which will be completed in accordance with AS3959.</p>
<p>swept paths are to be provided to demonstrate water tankers can manoeuvre within the site ensuring the buildings are defendable.</p>	<p>Traffic consultants to the SJG Richmond project, Transport & Traffic Planning Associates, obtained dimensions of water tankers used by the RFS. They were able to use a comparable vehicle size as used by the NSWFB and overlay onto the existing roadway system within the SJG Richmond site. The swept path for the water tankers can be viewed as part of the Blackash Report dated 13 August on pages 14 & 15. As demonstrated the vehicle can manoeuvre its way around the internal roadway system within the site. No new roads are proposed. The existing road network provides good linkage and opportunities for heavy fire tanker to access the site and turn around. Fire fighters can stage appliances off the roadways and can readily gain access between the buildings to adjacent areas as necessary. The existing roads throughout the site are two way and variable width with roll top kerbs, and parking areas more than accommodates the intent of measures of section 4.2.7 of PBP and the objectives within section 1.2, for internal roads and provision of safe operational access for emergency services personnel in suppressing a bush fire, while residents are accessing or egressing an area. (Refer to Appendix F Part 2b)</p>
<p>the architectural plans are to be updated demonstrating that the proposed buildings are constructed to BAL-FZ. As the Garden Pavilion is attached to the Residential Pavilions, PBP 2019 does not allow any downgrade of Bushfire Attack Level (BAL) when any part of the building is situated within BAL-FZ. For this reason, all new construction is to be in compliance with Section 3 and Section 9 (BAL-FZ) of Australian Standard</p>	<p>The NSW Rural Fire Service (RFS) document Planning for Bushfire Protection 2019 (PBP) provides the framework for the consideration of infill Special Fire Protection Purpose (SFPP) The determination of what constitutes a “better bushfire outcome” is not specified in criteria within PBP and is a somewhat subjective requirement relying on the approach of the Level 3 BPAD practitioner working in collaboration with</p>



3959:2018 Construction of buildings in bushfire areas.

the design team to come up with a reasonable and balanced outcome that reflects the risk for the site and which provides for a better bushfire outcome than currently exists on site. The deliberation and design associated with the proposed development has been worked through since late 2019 to provide the best outcome for the site in relation to bushfire issues. As noted earlier in this response, the RFS have accepted the site as being low risk. The PBP 2019 does not provide for the construction standards for buildings. Construction requirements are presented through the Building Code of Australia (BCA) which uses the Australian Standard for Construction of Buildings in Bushfire Prone Areas (AS3959) as providing the acceptable solutions or deemed to satisfy provisions for new construction. The AS3959 requires the determination of the highest BAL affecting a building. Importantly, the AS3959 (section 3.5 of AS3959 2018) provides for the reduction in building construction requirements due to shielding. The Bushfire Hazard Assessment and subsequent documentation provided a performance-based report supporting the application. The performance-based application determined the BAL for all buildings as shown in **Appendix F Part 2b** and recommended that the construction levels be reduced commensurate with the low risk and as provided for within the AS3959. The rear (non-hazard side of the buildings) sides of the buildings are not exposed to a bushfire fire source feature and the BAL assessment within the BHA, steps the construction levels down commensurate with the risk and shielding provided to the buildings. The condition that DPIE are seeking to impose is above the AS3959 and adds significant cost to the project for no net gain.

confirm that the landscaping proposed will be managed as an inner protection area (IPA) in accordance with Appendix 4 of Planning for Bush Fire Protection 2019 and the NSW Rural Fire Service's document Standards for asset protection zones.

The landscaping will comply with the RFS Standards for Asset Protection Zones. This can be provided as a condition of consent

detail the location of a 20,000-litre static water supply on site for firefighting purposes, additionally

The site is services by an existing reticulated hydrant system and an extension of this system



confirm that the water supply on site is in accordance with Table 6.8c of PP 2019.

for the new development. The RFS in previous responses have not flagged or required a separate 20,000L water tank for firefighting purposes. PBP does not require a separate static water supply for firefighting purposes where reticulated supply is provided. The external ring main and boosters meets the PBP requirements for the provision of water for firefighting purposes.

It should be noted that the new buildings will be built in accordance with the Building Code of Australia (BCA) which will provide internal fire protection above the requirements of AS3959 and PBP. The internal fire detection, suppression and fire safety provisions will complement the external construction which will be completed in accordance with AS3959.

An external ring main and boosters are also provided for firefighting purposes. This meets the PBP requirements for the provision of water for firefighting purposes

(Refer to **Appendix F Part 2b**)

1.8 Hawksbury Council – RFI

Hawksbury Council RtS commented that it must consider the effect of the proposed development on the heritage significance of the item or area concerned. The heritage assessment documents have been reviewed and it is considered that a Conservation Plan (as per NSW Heritage guidelines) should be prepared due to the considerable alterations proposed to the site. Planning advice for the project suggested that due to the minimal nature of works to Belmont House, this assessment may not be required. A subsequent meeting on 6 October 2021 with Hawksbury Council & their planner/heritage consultant, the SJG Richmond design team and heritage consultant resulted in the council accepting a Conservation Management Strategy (CMS) to enable condition of consent for the project, noting that a Conservation Management Plan (CMP) was to be documented during the redevelopment of the site and provide to council prior to Occupation Certificate.

Table 1.7 Response to Hawksbury Council	
Conservation Management Strategy	
Issue	Response
As part of the assessment process Hawkesbury Shire Council requested in their letter dated 19 February 2021 a Conservation Management Plan of the site. In a Heritage Advisory Meeting with Hawkesbury Council (6/10/21) Council agreed that a HAAP could be provided, that targeted the	A letter was prepared by the project teams heritage consultant in response to Hawkesbury City Council's request for a Conservation Management Plan (CMP) for the site, dated 19 February, 2021. (Refer to Appendix G Part 1b - Council Heritage Letter)



heritage impact of the proposed works to Belmont House only.

A Heritage Asset Action Plan (HAAP), formally called a Conservation Management Strategy has been prepared at the request of Hawkesbury Shire Council. The subject property is known as Belmont House which is part of the St. John of God Richmond Hospital. Also provided is a Maintenance Plan and Schedule of Conservation works. (Refer to **Appendix G Part 2b - HAAP Heritage Asset Action Plan (formally CMS)**)

Along with the abovementioned documents the following information was produced to support the Heritage Asset Action Plan & can be found in the following appendices:
Appendix G Part 3b - Schedule of Conservation Works
Appendix G Part 4b - Costed Heritage Asset Maintenance Plan
Appendix G Part 5b - Fabric Survey

1.9 Endeavour Energy – RFI

Table 1.8 Endeavour Energy	
Detail of the substation	
Issue	Response
As part Endeavour Energy’s RFI dated 2 July 2021, the request from the agency request detail/location of the substation.	As part of this updated response to RFI, Stantec Electrical Engineers, have provided new 1000kva padmounted substation location to the rear of Xavier Building. Note, an easement with a minimum size of 2.75 x 5.5 metres will be created & a restriction for fire rating will extends 3 metres horizontally from the base of the substation footing and 6 metres vertically from the same point. (Refer to Appendix H Part 1b_Site Plan High Voltage Layout)



1.10 TfNSW (RMS)

TfNSW has reviewed the submitted information and raises no objections to the proposed development, subject to the Department's approval and the following requirements being included in the development consent.

Table 1.9 TfNSW (RMS)	
Detail of the Green Travel Plan	
Issue	Response
<p>Prior to the issue of the first Occupation Certificate, the applicant should submit the final Green Travel Plan (GTP) to TfNSW at development.sco@transport.nsw.gov.au for endorsement with consultation with TfNSW. The final GTP should include:</p> <ol style="list-style-type: none"> 1. Details of shuttle service for staff and/or patients and visitor to/from Richmond station; 2. Analysis of residential postcode data for existing staff and a breakdown of shift patterns; 3. A Travel Access Guide (TAG) for staff, patients and visitors, detailing the sustainable arrangements available for all cohorts. 	<p>SJG Richmond agrees to work with the Design Team's traffic consultant to produce the request from TfNSW. & prior to the issue of the first Occupation Certificate.</p>

1.11 Heritage NSW ACH

Heritage NSW reiterates the following recommendations have that been provided in previous advice.

Table 1.10 Heritage NSW ACH	
Heritage NSW AHC – response to section 3.10	
Issue	Response
<p>Heritage NSW reiterates the following recommendations:</p> <ol style="list-style-type: none"> 1. Any Construction Environmental Management Plan prepared for the project should incorporate an Aboriginal Heritage 	<p>SJG Richmond confirms that in developing a Construction Environmental Management Plan for the project with the</p>



<p>Management Plan (AHMP) to minimize and avoid potential harm to the Richmond Hill Memorial Garden and areas of Aboriginal archaeological sensitivity adjacent to the construction footprint. This AHMP should be developed in consultation with the Registered Aboriginal Parties for the project.</p>	<p>nominated contract & design team, will incorporate Aboriginal Heritage Management Plan (AHMP). The plan will also be developed in consultation Registered Aboriginal Parties.</p>
<p>2. An Aboriginal cultural heritage awareness induction should be provided to all contractors and staff involved in the project.</p>	<p>An Aboriginal cultural heritage awareness induction will be developed by SJG Richmond, nominated contractor, design team including Registered Aboriginal Parties & provided to all involved with the project.</p>

1.11 Conclusion

Request for Information & submissions have been received from DPIE & government agencies. Minor amendments to the proposed development and further information have been provided to address these matters.

The proposed development as amended is considered to warrant approval for the following reasons:

- Further information has been provided to address comments.
- The amended proposal will result in a high-quality development that achieves the original aims of the proposal while resulting in no unacceptable environmental impacts.

Based on the supporting material provided in this Response to request for information and in addition to the material provided in the original EIS, DPIE has now been provided with sufficient information and documentation to progress the assessment of SSD-10394. It is requested that DPIE complete the assessment of the SSD and proceed to determination.

