

9 July 2022

Attention: The Planning Secretary

Department of Planning and Environment  
Planning Secretary, Social Infrastructure  
Social & Infrastructure Assessments

Dear Planning Secretary

**Subject: St John of God Richmond Hospital Redevelopment  
SSD-10394  
Condition C9  
Submission to the Planning Secretary**

We refer to Condition C9 of the State Significant Development (SSD) approval SSD-10394 in respect to the St John of God Richmond Hospital redevelopment in North Richmond NSW (the Project).

St John of God Health Care (SJGHC), the operator of the hospital, is a 'not-for-profit' health care organisation providing mental health services on the existing North Richmond Hospital site in the northwest of Sydney, continuing the care provided by the Hospitaller Order of St John of God (the Brothers) since 1952. The Project involves the redevelopment the existing mental health facility to provide additional capacity and an upgrade to facilities and services.

Inherent within the Project is SJGHC's strong desire to honour the heritage of the hospital and its services and further the work of the Brothers while expanding its service capabilities in a purpose designed environment. SJGHC is seeking to create a facility that fully supports the care the SJGHC's caregivers provide and supports our consumers to live their best lives.

Within the SSD approval are a number of conditions. Condition C9 of SSD-10394 states:

***Ecologically Sustainable Development***

***C9. Prior to the commencement of any construction, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate that ESD is being achieved by either:***

- (a) registering for a minimum 4-star Green Star rating with the Green Building Council Australia and submit evidence of registration to the Certifier; or*
- (b) seeking approval from the Planning Secretary for an alternative certification process.*

We are seeking, under this condition, approval for an alternative process.

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St John of God Health Care  
ARBN 051960 911 ABN 21 930 207 958  
(Limited Liability) Incorporated in  
Western Australia



The design work for the redevelopment progressed in parallel with the SSD approval process, and was developed adopting the principles of a 4-star Green Star facility, noting that this was consistent with the *SJG Richmond Hospital Ecologically Sustainable Development Report* dated 26/11/2020 as submitted with the SSD application.

Construction is soon to commence, and we seek to progress with a **Green Star Design and As-Built 4 Star Equivalency: Design and As-Built Review** process in lieu of the specific registration with the Green Building Council of Australia (GBCA) identified in the conditions. Although not registered with the GBCA, the design requirements process is managed by a Green Star Accredited Professional who will remain involved in the project throughout the design finalisation, construction and commissioning stages. The ESD requirements are therefore being achieved as required through an equivalent robust process and will ensure that the facility is both designed, constructed and operated to a 4-star Green Star equivalency.

The registration of the Project with GBCA will incur substantial additional fees, costs and ongoing obligations in a project that has already been impacted by significant rising construction and development costs. It will create delays which will further increase costs and put the quality of the development and scope of services for patients at risk.

It is noted that this process is currently adopted on many other public and private hospital facilities.

We look forward for you approval of this equivalent alternative approach. Please don't hesitate to contact me should you wish to discuss in further detail.

Yours sincerely

A handwritten signature in black ink, appearing to read 'David Burns'.

David Burns  
**Acting Chief Executive Officer**  
**Director of Finance and Performance**  
**St John of God Richmond Hospital**