

Attachment from Chloë Mason:

SSD, Development Application (SSD- 61389706)

- Uniting War Memorial Hospital Waverley

<https://www.planningportal.nsw.gov.au/major-projects/projects/uniting-war-memorial-hospital-waverley>

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## Introduction

Overall, I support this development. My reasons are listed following my comments on parts of the EIS.

The Application is significant for its good design and planned provision of services, and its contribution to the public interest in its site planning.

As a possible resident, I have a personal interest since as an inner-city dweller I could remain living (& volunteering) in the south-eastern region of Sydney. I appreciate the opportunity to comment on this EIS. Since about 2023 I have been peripherally engaged in consultations with Waverley Council staffers and the Applicant<sup>1</sup>; visiting retirement villages elsewhere and reading about reforms to accommodation for elderly people. In 2024 I appreciated being included in the Applicant's webinar with Waverley Neighbours about the finalisation of the MasterPlan. Valuable then to learn that the age of ILU buyers/incoming residents is in their/our 70s.

My comments focus on the ILUs in the setting as a retirement village with many proposed facilities, including the RACF.

Like most EISs, the material is voluminous and tricky to navigate. Owing to stray referencing in this EIS, the reader is led through a maze of documents. The misleading titling of Appendix 43 and truncations of the actual WDCP 2022 caused me extra problems before locating the actual WDCP 2022<sup>2</sup> necessary to read Appendix 40 for example.

I express my thanks to the Planners at DPIE for assistance.

What the EIS does not provide the reader is knowledge or data about the populations of ILUs/retirement villages, especially in urban areas. I was advised that Planning was not aware of such information/research, and similarly advised by Waverley Council. On enquiring to the Department of Planning, I was encouraged to raise this question in my submission, and more generally in preparing this submission.

My suggestion is for Planning/with agency collaboration to commission some basic research with input for the brief from cross-agency, especially the active transport (travel) section of TfNSW, and with stakeholders such as bicycle groups, local Council staff, ILU providers, academics and NGOs.<sup>3</sup> Given my interest, I have raised this question with NGOs and could pursue it with Sydney academics.

A specific aspect of research needs to be on driver's licences and conditions by age. In my experience, so many elderly people are "terrified" of losing their driver's licence and are unfamiliar with public transport. Personally, I accompany elderly friends on public transport, and they experience new and pleasant surprises. So, this knowledge could aid planning and human services for transport access.

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<sup>1</sup> EIS 6.1.27 Engagement & Appendix 17.

<sup>2</sup> Not to be confused with Attachment 43, the actual WDCP 2022:

[https://www.waverley.nsw.gov.au/\\_data/assets/pdf\\_file/0015/234042/Waverley\\_DCP\\_2022\\_Full\\_Version.pdf](https://www.waverley.nsw.gov.au/_data/assets/pdf_file/0015/234042/Waverley_DCP_2022_Full_Version.pdf)

<sup>3</sup> A few references could be provided, later.

I do not intend this as a question for the Applicant, so that it not delay or impede the assessment and approval of this SSD-DA.

### Documents with comment

The sequence of documents seems relevant to the final product of the EIS with its 43 appendices.

The Applicant's 2022 Scoping Report for the Secretary's Environmental Assessment Requirements (SEARs) predates the SEARS issued in 2023 to guide the preparation of the Applicant's EIS 2024. My understanding of the Government's assessment decision the steps are:

- Requirements (SEAR) – EIS Appendix 1 – ESD (p.4); Transport (pp.4-5)
  - Consideration of Waverley DCP 2022
- EIS – with its 43 appendices
- Satisfaction statement by Applicant – EIS Appendix A.

Under ESD (p.4) the SEARs refer to ESD principles<sup>4</sup> and their intent to meet or exceed performance standards, such as minimising greenhouse gas emissions, sealed surfaces etc. While the application of ESD can meet targets, the aim is to go above and beyond. This is the spirit in which I approach my review below.

### ESD as a strategy

In **EIS Appendix A Part 9. ESD**, the Applicant's states this requirement is satisfied by reference to its **EIS 6.1.9 and EIS Appendix 19 'ESD Report'**.

Of course, the commitment to ESD drives continuous improvement, and achievements over-and-above the requirements – for Waverley (application), demonstrated by the Applicant's energy plans. Ideally working towards sustainability can be a framing device for any development, including this one.

The Applicant's commitment to ESD, their 10-year plan<sup>5</sup> has much opportunity here for application. This plan includes a photo of the new Dorothy McCrae retirement village in Leichardt that I visited in 2023 and spoke with Uniting staff. Here for Waverley, the EIS demonstrates the Applicant's progress with geothermal energy and its use, along with solar PV panels throughout, and appropriate selection of building design and materials (also low VOCs materials with health awareness) (p.16?). The site planning, heritage and landscaping and biodiversity is impressive.

While some of the Applicant's ESD Report states its "potential targets" (p. 14 ff) are only intended to be detailed once the site is operational, I regard this as mistaken.

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<sup>4</sup> As in NSW legislation.

<sup>5</sup>

Below I point to transport matters for re-consideration by the Applicant and Planning at this planning stage and design stage.

Although there is much to like in Appendix 19, especially Uniting's Sustainability Strategy (part 2.3, page 10-12), especially partnering with others.

The text of Appendix 19 seems templated or what are generic statements of thoughts given to this DA. It's not a Strategy, as the title claims! For example, there's a reference to encouraging visits to nearby Bella Vista Farm and Bella Vista Village Green! – trip on the Metro? (ESP Appendix 19 3.5 Community p. 17).

More importantly, under Mobility (3.10) there's a greater emphasis on well-being and health, than even in the Green Travel Plan, although practical insight didn't catch onto car sharing (an equity benefit and health benefit).

Uniting's strategies for ESD recognise the need for actions with a continuous cutting edge for 'disrupting disadvantage' and 'ensuring choice' and driving down emissions.

## **Public Space**

Much appreciation EIS 6.1.7. Here, however the assessment of impacts (and in 3.3.5), descriptions do not take into account a major purpose of the development 231 ILUs. Residents would be vulnerable population on account of age, their motivation for deciding to live in a retirement village, living in single-person house for greater personal security.

With respect to conformity to WDCP 7.5 (b), I think the controls inappropriate for the development, instead the Applicant's limitations on public access recognises the vulnerability of some residents and the value of the providing better security.

### *Recommendation*

In fact, I suggest that the Applicant's compromise to 7 hours might be overly generous and I would like to see it reduced.

## **Transport matters**

In EIS Appendix A Part 10. Traffic, Transport and Accessibility, the Applicant nominates satisfaction by reference to its EIS 6.1.10 and Appendix 40 Traffic Impact Assessment of the EIS.

While the focus is on vehicles, residents of the proposed 231 ILUs do not seem well considered. Yet these could well have planning and design considerations. Trips generated by the operator (of the ILUs, the Applicant) should go to Scope 3 in calculating greenhouse gas emissions, suggesting opportunities for bettering ESD performance.

Appendix 40 appears to follow the 2022 Scoping Request more closely than the 2023 SEARs for Senior Housing. Certainly, it seems in line with the correspondence from TfNSW (at least its road network/traffic arm) including at the end of the Appendix. This impression is confirmed by EIS Table 4.2 Stakeholder & agency consultation (p.161) and Appendix 17 p.61.

A different way of framing/seeing the value of the site and its development is its proximity parklands, shopping and to Bondi Junction. Bondi Junction has the station with bus interchange, its cycling network, plus the proximity to existing car share pods and Waverley Council's long-standing support policy that supports car sharing services. Generations upcoming for accommodation in ILUs, where they are drawn from inner- and middle- ring suburbs are more familiar with using a mix of public transport, car sharing services, and for bicycle riders making the switch to e-bikes.

Below are several transport matters relevant to the planning and design stage of this major development. These are inter-linked, and I request they be considered together, and I conclude with a request to the Applicant. I hope it is of such small scale for the Architect/Designer that there would be no need for my request to impede delay etc as I expressed in my Introduction above.

### 1 Car parking spaces for ILUs – risk of over-provision with consequences for construction and costs

Without more, I am concerned by the Applicant's planning for higher levels of car parking than the statutory requirements, unfortunately these are still minima for car dependency.

Appendix 40 Table 4 (p. 24) relies upon the Applicant's claim for higher levels Table 5 (p.27) based on its reasoning 'commercial feasibility and to ensure all parking provisions for residents are provided onsite' (p.25).

But what is the demand for the aggregation of 231 ILUs? What is known about ILUs?

I point to the risk of:

- (a) Unnecessary costs of construction;
- (b) the cost of basement car parking would be bundled with ILUs and adding to price, without choice;
- (c) the presumption that ILU residents would have the requirements for car storage, as shown in Appendix 40 Table 5 p.27.

No data is advanced about the mobility of residents of ILUs/retirement villages – the sociability of retirement villages may well influence travel patterns and mode choice (including car sharing services).

The Applicant does present ABS Census transport data for residents of the area Waverley-Bondi Junction SA2 concluding “minimal use of private vehicles”.<sup>6</sup> Of course the incoming occupants of ILUs would be drawn from a much wider geographic area than W-BJ SA2 where the (sustainable) habits of non-private car use – ‘active travel for health’ are not so easily available.

At an anecdotal level, I can say that at another of the Applicant’s retirement villages in the inner west, I did ask about the provision of basement car parking spaces. Then, in 2023, I was told by a Uniting building staffer that each space adds \$90,000 to the cost.

At another village, I was told that some incoming residents of ILUs do not own a car, at any rate within 6 months new residents have sold their cars once they appreciate the availability of public transport and car sharing. This shows that while the Applicant’s expectations/experience of prospective purchasers and newly arrived residents, express a car as priority transport this may well change after a short period (6 months, even) in a new social milieu.

With the lack of research on the table, I’m not yet convinced by this level of basement car parking!

Were the Applicant to offer some ILUs without car parking spaces, could the price be lowered? [ and the local car sharing service, could it be more commercially viable?]

A win for the Applicant’s commitment to ESD, consistent with its 2023 report actions “to disrupt entrenched disadvantage” (p.3) and ensuring choice. the vehicle parking and facilities requirements for the proposed development at Appendix 40, pp.21-31.

With the cost of housing, it could be opportune to review SEPP Housing 2021 Seniors Living to amend the high levels of car parking required. Again, add to research brief, not a delay for Planning to assess & approve this DA.

## 2. Car sharing service: spatial planning

**I urge the Applicant to consider possible site design opportunities of ensuring well-sited spaces for car sharing vehicles available to ILU residents and the public.**

GoGet, a car sharing service provider in Waverley, offers a service to developers: <https://www.goget.com.au/business/goget-for-developers>

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<sup>6</sup> Traffix Consultants – **Appendix 22 Green Travel Plan**, p.7.

ILU residents at the Applicants sites at Leichhardt are reputedly using car sharing services, as do residents at the retirement villages Godwin Village, Jersey Road, Woollahra (pod in the forecourt) and Cardinal Freeman Village at Ashfield.

The benefits of car sharing relate to the stated aims of this Application:

- social equity, affordability – especially given the 23 ILUs allocated for social housing
- a good number of carshare spots on site or in proximity would give enable people without ownership to drive or be driven in a car.
- enables greater choice of transport mode, consistent with ESD and physical and mental health.

Car sharing services effectively reduce the need for private car ownership, for car storage, while catering to people who are able to drive a car.

### *Car sharing and this EIS*

Documentation for **EIS Appendix 2 - Architectural Plans** appears to deal only with the Applicant's pool of cars that are shared by staff, nor spaces/'pods' for cars of (private) car sharing services, such as GoGet and others.

The space- efficiency of car sharing for the built form is evidenced by the WDCP controls. **EIS Appendix 40 section 6.8 Car Share Facilities (page 30) cites the WDCP Table 4** (pp. 54-55)<sup>7</sup> for the rates of car share spaces and allows "1 car share space can be provided in lieu of 4 car spaces".

The **EIS Appendix 40 Traffic Impact Assessment (TIA)** presents a site audit of transport infrastructure and services surrounding the site (p. 3-7) of services although it omits 'car sharing pods' and providers of services.

**EIS Appendix 40 section 6.8 Car Share Facilities (page 30)**, concludes that for the ILUs, the rates would not be applicable because the 'ILU component would not be considered a standard residential or commercial development'.

This is puzzling because it suggests the Applicant has set aside any design considerations to enable residents of ILU to physically access car sharing services easily. This seems a retrograde step inconsistent with the Applicant's ESD Report.

Yet the intent of WDCP seems clear<sup>8</sup>. The Applicant's comment seems to result in lower standards (less choice, less ESD) appear then to apply to an ILU a unit in "residential development".

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<sup>7</sup> EIS Appendix 43 cites WDCP – SSD Edina Edina 7.8.4 (c) page (p.117)

<sup>8</sup> EIS Appendix 43 cites WDCP – SSD Edina 7.8.4 (c) page (p.117) and the Applicant's Comment refers back to General Provisions B7 7.7:

### 3. Parking and use of bicycles/power-assisted e-bicycles, or even e-tricycles for ILU residents

The site location has proximity to Queens Park 750m that serves a way into Centennial Park.

Here I am concerned by the presumption that no ILU residents will be riding their own bicycles/e-bikes, or street-rented e-bikes. From an overview of documents, it seems that this question has not been addressed relevantly to the demographic, scale of ILUs (med-large at 231), and changing usage of bicycles/e-bikes with upcoming generations. The issue matters because of potential design and planning consequences for:

- circulation & avoidance of conflicts<sup>9</sup>
- Surface level parking
- grades of driveways to basement parking
- allocation of bicycle storages – not taken out of ILU allocation.

Data about ownership of these vehicles and use by residents of ILUs would be valuable for planning and design<sup>10</sup> rather than deferring consideration until construction or occupation stage to avoid lost opportunities for sustainability (Applicant's performance benefitting social equity, health & wellbeing).

#### *Details in EIS documents*

Provision for bicycles is part of WDCP 2022 Edina E7 7.8.3 (f) which refers up to the general provisions B7 7.4 Pedestrian/Bicycle Circulation and Safety and B7 7.2 (a) – (k), found at Attachment 43 (pp. 44,45).

**Appendix 40** (p.47) refers to staff, visitors and residents being provided with bicycle facilities, with spaces for the resident “in the form of storage cages” (p. 29)

**Both Appendix 40 (and Green Travel Plan 22)** (pp. 47 and 11, respectively) refer to residents, and others, being provided with end-of-trip facilities and secure bicycle storage within the basement.

Elsewhere, **Appendix 7 Architectural Design Report** page 137 describes the storage for ILUs as follows

*Each apartment has been provided with well-designed and compliant storage. As a minimum each apartment will achieve the following storage areas: • Studio = 4m3 •*

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- (b) (p. 51): “accessible to those who use those spaces ...must be publicly accessible ...”
  - (c) “in optimum positions within the parking area.. to allow ease of access to car share vehicles by residents and the public.”

<sup>9</sup> WDCP SSD Edina – Part E7 7.8.2 (c) and 7.8.2 (e).

<sup>10</sup> 2013 Rusty rider & health study by Zander et.al., for example.

*1 Bedroom = 6m<sup>3</sup> • 2 Bedroom = 8m<sup>3</sup> • 3 Bedroom = 10m<sup>3</sup> • At least 50% of the required storage will be located within the apartment. Refer to the Storage Schedule for further information. [located Appendix 2 Storage Schedule Sheet DA9970].*

Does this mean that an ILU resident is expected to store their bicycle either in their apartment or in the storage cage? Does this then mean that, in real terms, no secured bicycle parking spaces are planned to be provided? If that is the case, then **Appendix 40 Table 6** (p.29) is misleading, or one might even say double-dipping?

Management of e-bicycles, heavier than solely human-powered bicycles need further consideration together with location of charging facilities. I do not know enough about tricycles or mobility scooters but from this text I am not confident that consideration has been given by an appropriately skilled person in this specialised and emerging technology.

#### 4. Cycling Without Age – for RACF and ILUs – planning & design

Cycling without Age (CWA) is a charity providing “a community service by connecting those no longer able to ride for themselves with their community and the outdoors by giving them free rides on trishaw ebikes, piloted by volunteer cyclists.”<sup>11</sup>

The CWA services offer inclusivity, provide joy, and connections inter-generationally. Such services are in accord with the Applicant’s commitment to ‘disrupt entrenched disadvantage’.

CWA operates in Sydney. In the Eastern Region, for example, residents at M by Montefiore (with 79 luxury ILUs) enjoy outdoor rides and this retirement village provides housing and charging facilities for this trishaw e-bike.

Being outdoors, trishaw e-bike rides, are sometimes in Nature, such as Centennial Park so that participants can enjoy being outside while obtaining the evidenced-based benefits for mental and physical health. In Appendix 22 Green Transport Plan, under Mobility (3.10) there’s mention of well-being and health, although omitting both car sharing services and such innovative services as CWA which have planning and design consequences.

#### Brief comment on the Green Travel Plan – EIS Appendix 22

The SEARs (**EIS Appendix A Part 10. Traffic, Transport and Accessibility**), describes promoting sustainable travel choices “for employees, students and

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<sup>11</sup> <https://cyclingwithoutage.org.au/>

visitors” with examples and implementing a Green Travel Plan. Appendix 40 references the associated **Green Travel Plan at Appendix 22**.

WDCP B7 7.5 (a) and (b) gives more details including for target-setting, although pre-occupied with journey-to-work (reflecting the roots of GTP/TDM in reduction of peak motor traffic congestion, rather than a framing by ESD!).

**Questions:** surely the omission of residents – ranging in number from 231 to 400 or more – is a mistake?

If not, are not residents to be afforded ESD consideration for their mobility needs?

For **Appendix 43** showing the Applicant’s compliance with WDCP 2022 GTP requirements through **Appendix 22 - Green Travel Plan**. It aims (pp. 6-7) ‘to assist with the management of future travel demands being generated as a consequence of the development’; and, that the proposed development is ‘for the purposes of senior housing’.

Relevantly to the planning process – this stage for approval of the plan and design – Appendix 22 highlights that new developments present excellent opportunities to accommodate innovative ideas about managing travel demands **into the design stage** (p.1.10). It continues: ‘transport demands... can be **efficiently managed** and future staff, visitors, and to an extent residents of the building would **not need to depend on the usage of private vehicles**’. Yay, ESD- thinking!

While this Green Travel Plan outlines some actions, it anticipates the work to be undertaken at the occupation stage. Above I have noted the risk of under-estimating

- the usage of cycling (all types of human/electric powered), with the uptake of e-bikes, and
- for ILU residents, the usage of car sharing services.

As I recommend above, further scrutiny of these issues may be warrant amending the design of the site.

Further, the Green Travel Plan refers to later providing site-specific measures and noting that such measures would need to include relations with service providers offsite. This is the practice with modern transport operators, as well as the literature on experience in Australian cities with Green Travel Plans/Travel Demand Management.

### My request to the Applicant for review of design, not to delay assessment/approval by Planning

I request the designer/architect (Architectus) to consider the possibilities, detailed below – to optimise on choice, promoting health, and high ESD performance standards. This would bring mobility services into the same high levels reached that the Applicant (entitled to be proud:)) has achieved for geothermal (+ no gas, no VOCs et), endemic plantings etc

**My issues for the designer/architect to further consider:**

- a) **reducing, even a very few basement car parking spaces; and**
- b) **catering for a possible tiny % of incoming residents with bicycles/e-bicycles by providing secure, shared parking space that is not taken out of their ILU-allocation;**
- c) **my point: to be clear, it would be absurd for the Applicant to provide bicycle storage cages at the rate in the controls of WDCP given the age-demographic of the ILU residents**
- d) **catering for the an e-trishaw used by Cycling without Age (CWA).**

**Reasons for supporting this development**

- Buildings on site need major rejuvenation
- Meeting community's needs, with child care facilities, and needs of aging population seeking accommodation in the inner city to be independent and secure - with permeability with the local community.
- Appreciate the proponent's vision, the scale and range of facilities, demonstrated commitment to environmental responsibility (e.g. geothermal energy; Nature & endemic plantings as habitat; and heritage)
- Proponent experienced in constructing and operating similar facilities, and responsive to changing needs and standards e.g. Parramatta and article in Urban Developer.
- Valuable scale e.g. 231 ILUs + RACF (104 beds) etc, and CIV \$376m. Value in creating a larger development, as seems to be the trend, for quality infrastructure, inclusivity, inter-generational communications. Sheer size of ILUs more easily fosters communities of interest and few high-ILU developments exist in the inner city, although some in middle ring e.g Cardinal Freeman (300+ ILUs).
- The site is close to parklands offering access to nature and bushcaring volunteer opportunities.
- The site is about 700m from Bondi Junction station (frequency of train service) with the bus interchange. The site has nearby bus stops with frequent services. And, of course, Waverley Council's long-standing support to car sharing services. The capacity exists for staff (~700), visitors (numbers ?) and residents of ILUs (~ 300+?) not to rely on private motor vehicles, thereby limiting motor traffic that is unwanted by the local community.

**A few comments on other EIS documents**

**EIS 6.1.4 Built Form and Urban Design**

6.1.4.1 Assessment Impacts

p. 95 Table 21 – *Seniors Housing Guidelines 2021*

Under 'Care for the Planet', I appreciate the Applicant's response: environmental stewardship through lifecycle. In operationalising opportunities for people to care

for native gardens and growing herbs & vegetables, and exotic flowers. As above, 'could do better' on transport!

p.85 Accessibility – Appendix 4

5.4 deals with car parking only

Spatial planning and construction could also be needed for bicycles, larger ebicycles, and CWA Trishaws + impact of car sharing services – though an assessment not made.

## EIS 6.1.7 Public Space

6.1.7.2 Assessment impacts

Like connection to Nature, ...endemic planting. Plus outdoor gym and community garden (p, 104).

p.102 last sentence omits bicycles.

## EIS 6.1.8 Trees and Landscaping

Under Part 3.3, Project Description, I am pleased to see the Applicant's commitment to the 2:1 ratio for replacement of trees and arborist care to ensure maximum tree-health and survival over time.

p. 106 Arcadia's sensory walk supported – especially with endemic plants.

On Italianate planting – NB 19<sup>th</sup> century Italians planted with Eucalypts as exotics, imported from Australia via Egypt.

Looked over **Appendices 26 & 27** – Landscape Plans, Landscape Report – good to see! Enjoyed reading species listing. For Victoriana look, Lord Howe Island palms could be good to evoke the period!<sup>12</sup> See Atkins' biography of McCulloch.

## EIS 6.1.9 ESD 6.1.9 and Biodiversity 6.1.11

ESD text introduction (p.7) omits Nature.

Preconditions addressed well in other parts of EIS), much substance in **Appendices 19 and 9** as well as addressed preconditions for geotechnical and groundwater and water management. On these topics, **my comments are made to WDCP 2022 Appendix 43** elsewhere. On ESD the weakest topic is transport, as discussed above with my recommendation for design considerations.

## EIS 6.1.10 Traffic Noise 6.1.12.1-3

**Traffic noise pp 121-122**

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<sup>12</sup> Atkins *The Naturalist. The extraordinary life of Allan Riverstone McCulloch.*

Since the webinar late 2024 where neighbours and me raised concerns about traffic noise, asking about window-glazing to reduce noise from Bronte Road and Birrell Street, it's good to see the responsiveness of the Applicant in its plans for double-glazing ILUs and living spaces RACF (Appendix 19, BASIX).

Thank you. ▲▲