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8 August 2012

Sam Haddad  
Director-General  
Department of Planning and Infrastructure  
GPO Box 39  
SYDNEY NSW 2000

Attention: Natasha Harras (Town Planner)

Dear Natasha

**MODIFICATION TO CONCEPT PLAN MP05\_0001  
ROYAL REHABILITATION CENTRE, SYDNEY**

We refer to the above mentioned section 75W modification relating to the RRCS Concept Plan currently under assessment by the Department of Planning and Infrastructure (the Department). The proposed modification relates to the updating of the approved Concept Plan Drawings to reflect the approval of Stage 1 Phase 1 and the current philosophy of development over the site. Since lodgement, further consideration of the layout of dwellings in Stage 1 has occurred, and it has been determined in consultation with Ryde City Council (Council) that the four semi-detached dwellings on the north eastern portion of Stage 1 fronting Victoria Road could be removed and the GFA of these dwellings better distributed throughout the Stage 1 site.

This letter identifies the proposed amendments, provides justification of these amendments and is accompanied by the following documents:

- Urban Design Review Panel Minutes prepared by the Ryde Urban Design Review Panel (**Attachment A**); and
- Amended Concept Plan Drawings prepared by Cox Richardson Architects dated August 2012 (**Attachment B**).

**1.0 BACKGROUND**

Since lodgement of the Concept Plan modification, ongoing consultation has been undertaken with Council and preliminary discussions have been held on the lodgement of a Development Application for the next stage of development in Stage 1 (Stage 1 Phase 4A) fronting Victoria Road. Throughout this consultation, it has been discussed that the four semi-detached dwellings on the north eastern portion of Stage 1 fronting Victoria Road were poorly located and that the density of these dwellings could be better distributed throughout Stage 1.

Preliminary plans illustrating the removal of the four semi-detached dwellings were contrasted against the current Concept Plan Modification Drawings at a meeting on 13 June 2012 with the Ryde Urban Design Review Panel (Ryde UDRP). The Ryde UDRP provided comments on this meeting (**Attachment A**) which confirmed that the four semi-detached dwellings were isolated and have poor address and access. The Ryde UDRP also confirmed that their preference would be to remove the dwellings, and noted that the floorspace may be able to be relocated within the site.

Following these comments, amended Concept Plan Drawings prepared by Cox Richardson Architects (**Attachment B**) illustrating the removal of the four semi-detached dwellings and the redistribution of their GFA across the remainder of Stage 1 were provided to Council at a meeting on 23 July 2012. It was agreed by Council's Group Manager Environment and Planning that the redistribution of the density of these four dwellings across the remaining buildings of Stage 1 would represent a more superior design outcome, and that in Council's written submission to the Concept Plan modification no objection would be raised to these changes.

## 2.0 PROPOSED AMENDMENTS

The Amended Concept Plan Drawings provided at **Attachment B** seek to address one technical matter and one design matter which have arisen during Frasers' consultation with the City of Ryde Council during the pre-lodgement phase for the Stage 1 Phase 4A Development Application.

Ryde Council raised concern that whilst the Cox Richardson Concept Plan Drawings which were originally submitted with the S75W Modification Application excluded rooftop plant and lift overruns, the *Ryde Local Environmental Plan 2010* calculates building height at the 'highest point' and hence includes these items within the calculation of building height. In order to provide certainty for Council moving forward in their assessment of future DAs for Stage 1, the Amended Concept Plans provided at **Attachment B** provide an additional 3 to 3.5 metres in height to account for rooftop plant and lift overruns on Buildings 2A(east), 3A and 4A as well as the slope of the site in the vicinity of Victoria Road. The amended drawings do not alter the overall dwelling yield for the site (791) or the approved FSR within these precincts.

Further to the comments provided by the Ryde UDRP and City of Ryde Council officers, it is proposed to remove the four dwellings located to the east of Apartment Building 4A which were not considered to achieve the best design response and instead redistribute this residential floor space to Apartment Buildings 2A(east) by providing an additional storey to part of this building. The effect of this redistribution will be to open up a significant area of open space between Victoria Road and Road 12 and create a tiered built form to Building 2A(east) which steps development back from the site's frontage.

**Table 1** explains the relationship between the building heights approved under the Concept Plan and translated into the Ryde LEP, the exhibited Concept Plan modification and the amended Master Plan Drawings provided at **Attachment B**.

**Table 1** – Approved, Exhibited and Amended Building Heights in storeys (and metres)

Building	Concept Plan Approved	Exhibited S75W Mod. Concept Plan Drawings	Amended Concept Plan Drawings
2A(east)	18.5m (including plant)	18.5m ( <u>excluding</u> plant)	24.5m (including plant)
2A(west)	18.5m (including plant)	18.5m ( <u>excluding</u> plant)	21.5m (including plant)
3A	21.5m (including plant)	21.5m ( <u>excluding</u> plant)	24.5m (including plant)
4A	21.5m (including plant)	21.5m ( <u>excluding</u> plant)	25m (including plant)

It is also noted that an updated Indicative Section Drawing has been submitted. The originally submitted Indicative Sections Drawings provided preliminary indicative sections for Stage 2 which did not reflect the 2006 approved scheme. The amended Indicative Section Drawing (**Attachment B**) does not include details of Stage 2 as a subsequent Section 75W modification to the Concept Plan will be undertaken to amend the design of Stage 2 once the detailed design of this stage is planned by Frasers.

### 3.0 ENVIRONMENT ASSESSMENT

The removal of the four semi-detached dwellings will facilitate the creation of a new landscaped park fronting Victoria Road. This park will enable the replanting of transplanted trees across the site, will facilitate the continuation of paths throughout the development to provide pedestrian linkages to Victoria Road, and will improve the overall amenity of the site for future residents and the surrounding community. The detailed design of this open space, including ownership and management arrangements will be resolved with Council at the relevant Development Application.

The creation of this new landscaped park will also provide an improved interface to the existing residencies located on the Charles Street boundary of the site. The proposed increase in height on Buildings 2A(east) will enable an even distribution of density across Stage 1 and will remain in line with Council's and the community's preference<sup>1</sup> for higher densities fronting Victoria Road. The proposed three metre increase in height will also account for the plant areas to be fully compliant and contained within the Concept Plan height limit.

There will not be any adverse overshadowing impacts from the proposed increases in height across Building 2A, 3A and 4A. The shadowing from the buildings will be generally contained within the site and any overshadowing will occur on areas already subject to shadow (i.e. building roofs).

### 4.0 CONCLUSION

The above amendments are considered minor in nature as they redistribute GFA across Stage 1 due to the removal of the four semi-detached dwellings and also account for anticipated plant space requirements on top of the apartment building. The amendments do not result in any inconsistency with the total number of dwellings (791) permissible across the site under the Concept Plan approval. A superior design outcome will also be achieved through the redistribution of the density and an improved use of space will be facilitated. In light of the above and due to the minor interest shown in the initial exhibition of the modification, it is considered that the proposed amendments do not warrant further exhibition, however, we seek your confirmation of this.

Should you have any queries about this matter, please do not hesitate to contact Clare Swan on 9956 6962 or at [cswan@jbaplanning.com.au](mailto:cswan@jbaplanning.com.au).

Yours faithfully,



Clare Swan  
*Associate*

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<sup>1</sup> Community consultation has been carried out by Frasers and the community expressed the view that more of the 791 dwellings should be located in Stage 1 opposed to Stage 2.