

Response to Submissions and Amendments to Proposed Development



Former Royal Rehabilitation Centre Sydney, Ryde Amended Stage 2 Layout

Submitted to Department of Planning and Environment
On Behalf of Frasers Putney Pty Ltd

May 2014 ■ 13262

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Brendan Hoskins

23/05/2014

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Clare Swan

23/05/2014

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Under Separate Cover

Landowners Consent

Frasers Putney Pty Ltd

1.0 Introduction

A modification application to the Former Royal Rehabilitation Centre Sydney (RRCS) Concept Plan made under Section 75W of the *Environmental Planning and Assessment Act 1979* (EP&A Act) was publicly exhibited between 29 January 2014 and 28 February 2014 (MP05_0001 MOD 2).

In total, 14 submissions were received in response to the public exhibition of the modification application. This included submissions from government agencies and authorities, and the general public, as follows:

- Government authorities and agencies (including Ryde City Council) – 4; and
- Members of the public – 8.

The Department of Planning and Environment (the Department) has also prepared a letter setting out additional information or clarification required prior to final assessment of the modification.

This report, prepared by JBA on behalf of Frasers Putney Pty Ltd, sets out the responses to the issues raised during the public exhibition period, and details the final modifications to the Concept Plan Approval for which approval is now sought.

The report provides a detailed response to all of the issues raised by the various government agencies and the general public. The key issues raised in submissions (Department, Council and the general public) can be broadly grouped into the following categories:

- Built Form;
- Development Controls and Future Assessment;
- Roads and Traffic; and
- Pedestrian and Cycle Access and Safety.

This report provides a detailed response to each of the above issues and outlines the proposed modifications to Concept Plan (MP05_0001). Aspects of the modification application which require additional assessment as requested by the Department are set out in **Section 4.0**.

1.1.1 Amendments to Proposed Modifications

To reflect the changes that have been made to the proposed modification following public exhibition and for which approval is now sought, and to address issues raised in the submissions, a set of updated Concept Plan Drawings have been prepared by Cox Richardson Architects (refer to **Appendix B**).

The following consultants' reports and supporting information has been updated or further supplements the material originally submitted in support of the modification:

- Amended Concept Plan Drawings prepared by Cox Richardson Architects (**Appendix B**);
- Putney Hill Design Guidelines prepared by Cox Richardson Architects (**Appendix C**)
- Additional Landscape Drawings prepared by Environmental Partnership (**Appendix D**);
- Addendum Traffic Confirmation Letter prepared by CBHK (**Appendix E**); and

- Legal Advice regarding Roads 2 and 6 Easement prepared by Norton Rose Fulbright (**Appendix F**).

The revised supporting documentation enables the Department to undertake an informed assessment of the amended modification. The findings of the revised supporting consultant documentation are discussed at **Section 3.0** of this report as relevant. Certified photomontages are currently being prepared by Richard Lamb and Associates and will be provided under separate cover in the near future.

This report should be read in conjunction with the modification report prepared by JBA, dated December 2013, as relevant.

2.0 Key Issues and Proponent's Response

This section of the report provides a detailed response to the key issues raised by the Department, Council, and the general public during the public exhibition of the SSDA. The key issues included:

- Built Form;
- Development Controls and Future Assessment;
- Roads and Traffic; and
- Pedestrian and Cycle Access and Safety.

An overview of the key issues/matters for consideration is provided below, accompanied by a response by the proponent. Other issues which require further assessment, such as those requested by the Department are considered at **Section 4.0**.

Government Authorities and Agencies

A total of four (4) submissions were received from government agencies and authorities in response to the exhibition of the modification application. Specifically, responses were received from:

- Roads and Maritime Services (RMS);
- Transport for New South Wales (TfNSW);
- Office of Environment and Heritage (OEH); and
- Ryde City Council (Council).

RMS, TfNSW and OEH confirmed in their submissions that they have no comment on the modification application. Council have provided a range of comments which are addressed throughout the key issues further within this section.

The Department provided an overarching letter (as the assessment authority) summarising the key matters to be addressed and additional information to be provided.

General Public

JBA has analysed the submissions received from the general public in response to the public exhibition. A total of eight (8) submissions were received, comprising:

- Seven (7) submissions from surrounding residents objecting to the modification; and
- One (1) submission from the adjoining Royal Rehabilitation Centre objecting to the modification.

These submissions raised a variety of issues including building height, setbacks, overshadowing, traffic generation and parking, photomontage accuracy, substantially the same development, privacy, environmental considerations, landowners consent and other general issues. A detailed response to the issues raised by the general public has been provided at **Appendix A**.

2.1 Built Form

2.1.1 Issue

The Department has raised concern that the height of the buildings fronting Linley Way may cause adverse visual impacts, in turn affecting the amenity and character of the surrounding area. It has been suggested by the Department that consideration be provided to the following points:

- Reducing the height of buildings fronting Linley Way, particularly the façades presenting to existing residential dwellings;
- Incorporating design excellence requirements into the Concept Plan Approval for buildings fronting Morrison Road; and
- Amending the street setbacks for buildings fronting Morrison Road.

Council did not raise any objection to the height of buildings, but suggested that the setbacks to Morrison Road and Princes Street be more closely reviewed. Council also acknowledged that the future buildings were likely to be well designed, but requested that additional controls be included in the Concept Plan to secure the achievement of well-designed buildings.

Clarification was also requested on the size of the proposed building envelopes and their relationship with the future built form. Concern was raised by the Department that the volume of the proposed building envelopes will greatly exceed the future articulated building envelopes and expected dwelling mix.

The general public have raised a number of issues related to the built form of the proposal, primarily falling into the categories of building height and setbacks. Surrounding residents have suggested that the building height is too large and setbacks are insufficient. A number of submissions also suggested that excessive overshadowing impacts will occur.

2.1.2 Response

In response to the issues raised in the public exhibition period, the proposed modifications to the built form have been amended. The key changes to the proposal and how these address each of the considerations raised in the submissions is set out below.

Building Height

The height and bulk of several of the building envelopes within Stage 2 have been amended to respond to issues from the Department and the general public. Specifically, the maximum height of buildings fronting the Linley Way boundary has now been stepped, with the façade facing this boundary reduced by 3.5 metres in height. The effect of this stepped form is a building height which is perceived as lower when viewed from Linley Way and surrounding residential streets. Amended photomontages are currently being prepared by Richard Lamb and Associates and will be provided under separate cover in the near future.

In addition to these building height variations, a storey limit to each building envelope has been provided in the Putney Hill Design Guidelines provided at **Appendix C**. This storey limit will apply to residential storeys and will provide greater certainty and clarity on the building envelopes which will be delivered within the site. Plant and lift overruns would continue to be required to sit within the overall building height limit as expressed in metres.

These changes constitute an improvement to the built form and represent a refined proposal which will still achieve the envisaged number of dwellings.

Design Excellence Requirement

The Department and Council's request to include design excellence requirements for future buildings on the site has been included in the amended proposal in the form of a new statement of commitment. This new commitment, along with the established urban design review process undertaken by Council, will ensure that the future built form achieves a high quality of architectural design.

Setbacks

The two 'L' shaped buildings fronting Morrison Road have been setback further from the layout originally proposed in the exhibited modification application. The predominant building line is now setback a minimum of 15 metres from Morrison Road, compared to the exhibited setback of 10 metres. This setback is the maximum which can be achieved for these buildings considering the topography of the site and the objective of retaining more significant existing trees. The topography drops sharply from these buildings when moved further within the site. As set out in **Section 3.2.3** below, the maximum height of the two 'L' shaped buildings has been increased in part to account for the greater building height where the site begins to dramatically slope.

A stand of significant trees is also located in close proximity to these building envelopes. As such, any additional movement of the building envelopes would not only result in further maximum height increases, it would necessitate the removal of a greater number of existing trees. Hence, it is considered that the 15 metres setback is a well-reasoned outcome.

Overshadowing

In increasing the setbacks to Morrison Road and Princes Street, the amendments to the Stage 2 Concept Plan Modification will result in a reduction in the impact of overshadowing on surrounding residential areas. Existing residential properties opposite the site on Morrison Road would continue to receive at least 3 hours of sunlight to their front yards.

Building Envelopes and Future Apartments

Cox Richardson Architects have undertaken an analysis of the future apartments compared to the bulk of the proposed envelopes to confirm that the building envelopes are not excessive. This analysis comprised the inclusion of indicative floor plans within the building envelopes to illustrate that the floor plans fit wholly within the envelopes, with a reasonable area remaining for articulation and any minor movement of floor plans in the detailed design.

For the indicative scheme, Cox Richardson have assumed an average size of 110m² for apartments, with eight apartments located on each level. The number of levels provided in the indicative scheme is consistent with the new storey limit provided in the amended Concept Plan Drawings (refer to **Appendix B**). This indicative scheme provides sufficient flexibility for Cox Richardson to refine the layout of apartments, and ensures an 'upper limit' scenario is modelled to mitigate any further need to modify the building envelopes.

Based on this analysis, Cox Richardson have determined that the building envelopes are not excessive, and are sufficiently sized to encapsulate the future built form. It is acknowledged that there is flexibility in these envelopes for articulation and to account for the significant variation in topography over the site. The key purpose of including this flexibility is to avoid any further procedural modifications to account for minor exceedances of the envelopes.

2.2 Development Controls and Future Assessment

2.2.1 Issue

Both Council and the Department have suggested that a storey limit be provided to correspond with the maximum building heights proposed for the respective building envelopes. A suggestion has also been provided by Council and the Department that amended Floor Space Ratio (FSR) controls be provided reflective of the phasing of the development. Separately, Council has requested that clearer setback controls are provided to enable an efficient assessment of future applications.

No comment was provided by the general public on the development controls and future assessment processes.

2.2.2 Response

Frasers Putney is supportive of both suggestions by Council and the Department and any amended controls which will facilitate a more informed and efficient assessment process. The ways in which these controls have been implemented into the proposed modifications to the Concept Plan are set out below.

Storey Limit

In direct response to Councils and the Departments request, a storey limit has been included for each future building within Stage 2. This storey limit restricts the number of residential levels to be provided within each building, whilst still providing flexibility for residential uses to be provided when screening basement parking protrusions. The sloping topography of the site results in difficulties in providing a consistent storey limit across each of the buildings.

A storey limit has been applied to the 'Building Height' Drawing to be approved under the Concept Plan (refer to **Appendix B**). Further guidance on the storey limit for each of the buildings has been provided in the Putney Hill Design Guidelines (**Appendix C**).

FSR Controls

The FSR control plan submitted with original modification has been amended to reflect the comments provided by the Department and Council. This plan now provides floor space zones in accordance with the amended building layout. The total quantum of floor space achievable under the original Concept Plan approval is not proposed to be amended.

Setbacks

Amended setback controls have been noted on the Concept Plan Drawings where appropriate (refer to **Appendix B**). The measurements noted on these plans constitute the minimum setbacks, therefore providing Council with minimums to be assessed in future applications.

2.3 Roads and Traffic

2.3.1 Issue

The Department has highlighted that the considerations raised by RRCS in their submission should be addressed. These issues related to the safety of pedestrians in the site and the distribution of traffic on internal roads. Concern was raised by RRCS over the provision of lower scale dwelling to Roads 2 and 6,

and the effect of additional driveways on vehicular and pedestrian safety and movements.

RRCS has suggested that an additional access point should be provided into the Stage 2 site. The Department has reaffirmed this suggestion, requesting that consideration be given to increasing permeability through the site and distributing traffic flows from the site.

Council has requested that a detailed traffic assessment be undertaken using up-to-date traffic data of surrounding intersections and roads, as well as new trip generation assumptions for the future redevelopment. Based on Council's comments, the Department has requested that this updated information be provided. In particular, the Department has requested the details be provided on the capacity of Roads 2 and 6 in accommodating traffic which will be generated by the proposal.

Council has also requested that information be provided on the assumptions which have been made to discount car parking for the development.

A variety of issues were raised by the general public regarding traffic and parking considerations. The primary concerns included congestion of surrounding roads, a lack of parking and access points for the site.

2.3.2 Response

In light of the comments provided by the Department, Council and the general public, the design of the internal road network has been amended to include an additional connection to Morrison Road. This connection will improve the permeability of the site and enable a more even distribution of traffic flows. The amendment of the road network resolves a number of issues raised in the submissions, yet those issues which require further discussion are outlined below.

A detailed response to the traffic considerations raised by RRCS in their submission to the modification is provided at **Appendix A**. The Addendum Traffic Confirmation Letter prepared by CBHK and provided at **Appendix E** has also provided a detailed response to these issues based on technical grounds.

It has been determined by CBHK that Roads 2 and 6 have sufficient capacity to operate at a good level of service with the traffic expected to be generated by the proposal. Traffic flows on Road 6 are expected to be similar or less than the levels envisaged in the approved Concept Plan as a result of the proposed modifications and introduction of a new vehicular access to Morrison Road. Road 6 is classified as a local residential street, which based on RMS guidelines, has a capacity of 300 vehicles per hour (two way). With the changes to traffic movements resulting from the modified Concept Plan, during the weekday peak periods it is expected that approximately 100 vehicles per hour (two way) would use Road 6, which is well within the capacity of this roadway.

The provision of updated traffic data for surrounding intersections and streets is not considered necessary in light of the nature of the Concept Plan and the proposed modification. The original Concept Plan traffic assessment and mitigation measures for traffic impacts were based on 900 dwellings, before the maximum number of dwellings was reduced to 791 in the final approval. As such, the traffic generation of the proposal will always be below that originally assessed and approved as appropriate. As such, it is not considered necessary at this stage to provide detailed and updated traffic data given that the proposed modification is consistent with the maximum dwelling cap approved in the original Concept Plan. It is acknowledged that during the assessment of detailed applications for development updated traffic data will be required.

The car parking requirements specified in Condition C7 of the Concept Plan Approval are not proposed to be amended as part of this modification. No discount to car parking rates is sought as part of the modification.

2.4 Pedestrian and Cycle Access and Safety

2.4.1 Issue

The Department has suggested that consideration should be provided to improving pedestrian and bicycle access and permeability through the site. In particular, the Department suggested access from the corner of Princes Street and Morrison Road should be provided through the site.

Council has provided similar suggestions, requesting that greater connectivity is provided within the site and an attractive and easy pedestrian network is established. More information on pedestrian connections has been sought by Council.

No concerns over pedestrian safety and cycle access were raised by the general public.

2.4.2 Response

The pedestrian and cycle connectivity available through the site has been reconsidered and enhancements have been made post exhibition of the modification. An effort has been made by Frasers and the project team to provide clear and legible pedestrian and cycle connections through the site.

The amended Public Domain Drawing provided at **Appendix B** illustrates the pedestrian and cycle connections through the site. This plan establishes the key linkages which will be provided in the detailed stages of development, generally reflecting the most desirable lines of travel through the site. Greater permeability has been achieved in the amended design with an additional connection to Morrison Road, and greater provision of pedestrian routes from Road 6 to Princes Street.

It is noted, however, that the final design of pedestrian and cycle paths will be the subject of future applications.

2.5 Other Issues

1.1.2 Visual Impact

The Department has requested that additional photomontages be provided to better understand the visual presence of the proposal in the existing environment. This suggestion was reaffirmed in the Council submission which provided details of potential locations where additional photomontages could be taken. The additional photomontages are from locations further afield from the site, representing 'regional' views. These locations include:

- The Ryde Bridge; and
- The Ryde X Services Club.

Richard Lamb and Associates in consultation with Cox Richardson Architects are in the process of preparing these two additional photomontages which would be provided under separate cover in the near future.

As well as the two additional photomontages, Richard Lamb and Associates are updating the two previously submitted montages in response to the amended design.

1.1.3 Landowners Consent

The landowner of the site is Frasers Putney Pty Ltd. As set out in **Section 3.2.1**, the site boundary has been adjusted to ensure that the proposed modification application relates only to land within the residential portion of the Concept Plan site. Landowners consent is provided under separate cover.

1.1.4 Putney Hill Design Guidelines

Cox Richardson Architects have prepared the Putney Hill Design Guidelines (**Appendix C**) to provide further guidance on the assessment of future Development Applications. These guidelines address key requirements associated with the future built form such as height, setbacks and landscaping.

The intention of this document is to be used as guidance for the assessment of future applications. The controls set out in the design guidelines are not intended to be implemented as statutory controls, rather high level direction on how the future built form should appear.

3.0 Proposed Amended Modification

Since public exhibition of the proposed modification, generally minor amendments have been made to the proposal. The changes include aspects made in response to the issues and comments raised by the Department, Council and the general public, along with adjustments made to optimise the future built form.

The proposed changes are shown on the amended Concept Plan Drawings prepared by Cox Richardson Architects (**Appendix B**).

The following section presents a brief updated description (where relevant) of the proposed modifications for which approval is sought. The modifications overall are considered to be positive and aim to deliver an improved outcome on the site. Accordingly, and as detailed in **Section 4.0**, the changes are not considered to give rise to any material alteration to the environmental assessment of the potential impacts considered as part of the original modification application.

The proposed modifications set out in Section 4.0 of the modification application prepared by JBA and dated December 2013 remain unchanged unless specified below.

3.1 Overview of Approval Sought (as amended)

This modification is seeking that the Minister:

- Modify Condition A1 and Condition A2 of the Conditions of Approval MP05_0001 to include the original modification application report dated December 2013, and this report and update certain approved Concept Plan Control Diagrams by BSA Architects with Concept Plan drawings prepared by Cox Richardson Architects, being:
 - Land Use – Control [PP03/05]
 - Landscaped Space- Control [PP04/05]
 - Floor Space-Control [PP05/05]
 - Residential Density [PP06/05]
 - Road Hierarchy- Control [PP07/05]
 - Public Domain- Control [PP08/05]
 - Building Height and Setback – Control [PP09/05]
 - Indicative Sections – Indicative [PP10/05A and PP10/05B]
 - Car Parking – Indicative [PP11/05]
 - Pedestrian and Bicycle Paths – Indicative [PP12/05A and PP12/05B]
 - Road and Pathway Sections – Control [PP13/05]
 - Indicative Development Proposal– Indicative [PP14/05]
 - Aerial Views – Indicative [PP16/05 and P17/05]
 - Shadow Diagrams – Indicative [PP23/05, PP24/05 and PP25/05]
- Include an additional 'Statement of Commitment' C15. Design Excellence Requirements.

3.2 Proposed Modified Concept Plan

Cox Richardson Architects have prepared an updated set of Concept Plan Drawings reflective of the most up-to-date intent for residential development within Stage 2 of the Concept Plan. Those elements which have been amended since the exhibited modification application are discussed below.

3.2.1 Site Extent

The extent of the Concept Plan site to which this modification applies has been revised from the original modification. The stage 2 site boundary is now located on the Frasers Putney owner side of Roads 2 and 6. **Figure 1** illustrates the amended site boundary.



Figure 5 – Amended site boundary

Source: Cox Richardson Architects

3.2.2 Building Layout and Setbacks

The positioning of building envelopes and subsequent setbacks to Morrison Road and Princes Street has been amended in light of comments made during the public exhibition period. The setbacks to Morrison Road and Princes Street have been increased from the exhibited modification application to a minimum of 15 metres (increased from 10 metres).

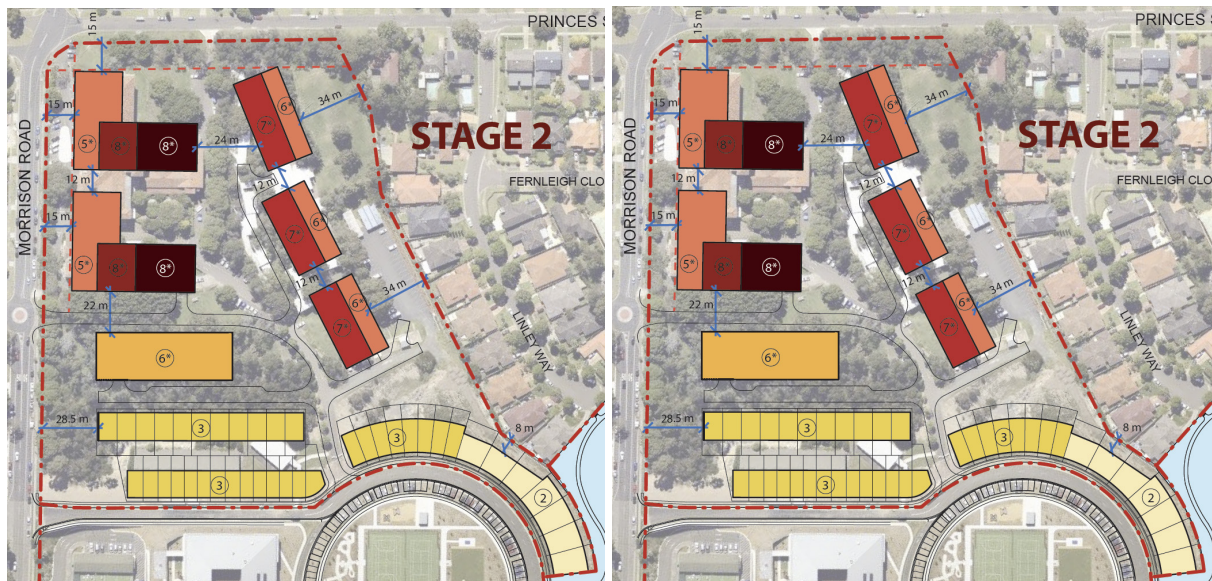


Figure 6 – Proposed building layout and setbacks

Source: Cox Richardson Architects

3.2.3 Building Height

In direct response to submissions received during the public exhibition period, the maximum heights of the apartment buildings fronting Linley Way have been decreased. A stepped built form is now adopted for these three apartment buildings, with the façade closest to existing residential dwellings lowered to minimise the presence of the buildings.

An increase in height has been proposed on the interior section of the 'L' shaped buildings fronting Morrison Road. This has arisen from shifting the buildings further into the site, as requested by both the Department and Council and therefore directly responds to the site's topography which drops off at this point. It is emphasised that the maximum RL will not be modified. The increase in building height results from the slope of the site and maintaining a consistent overall height for the building. Further, these height increases are located within the central portion of the Stage 2 site and represent the areas furthest away from established residential areas surrounding the site.

Furthermore, the increased height will not result in a greater number of whole residential levels. Where the greater building height is proposed, residential apartments will be provided at the ground level to screen the increased basement car parking protrusion.

Figure 3 illustrates the proposed building heights within Stage 2 compared to those originally proposed in the modification application.

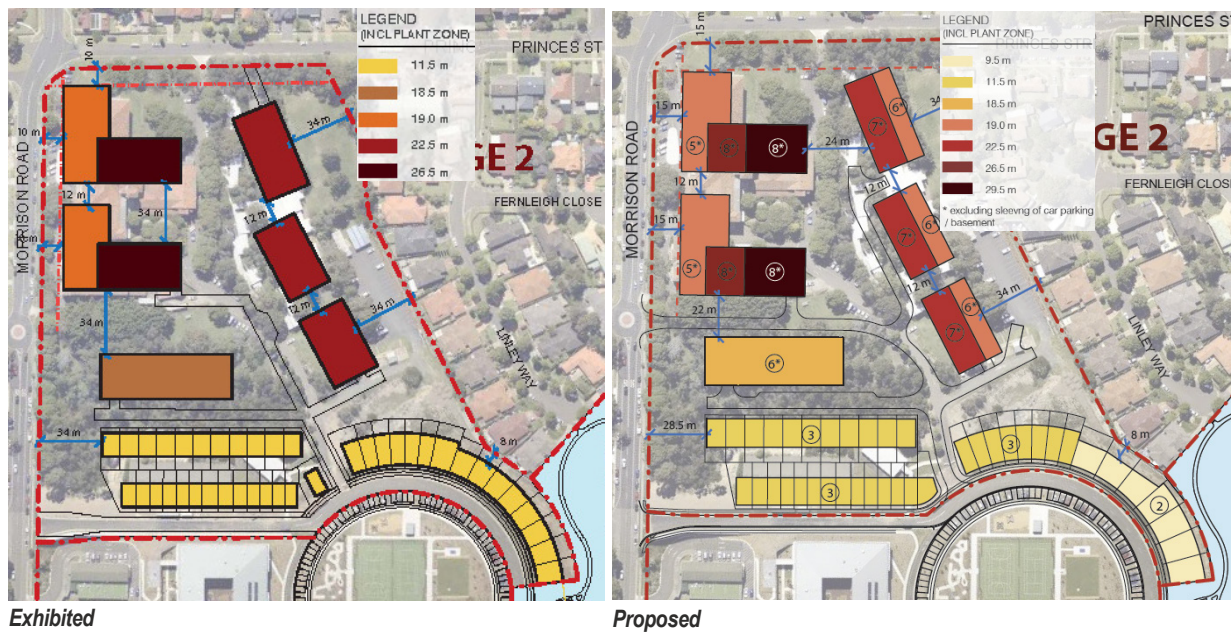


Figure 1 – Comparison of exhibited and proposed building height plan

Source: Cox Richardson Architects

3.2.4 Street Layout and Access

In response to comments made during the exhibition period, Frasers Putney has sought to amend the street layout within Stage 2 of the Concept Plan. Concern was raised during the exhibition period on the lack of access into/from the Stage 2 site. As such, an additional access point on Morrison Road is now proposed, providing a more permeable street network. A comparison of the exhibited and proposed street network is illustrated in **Figure 4**.

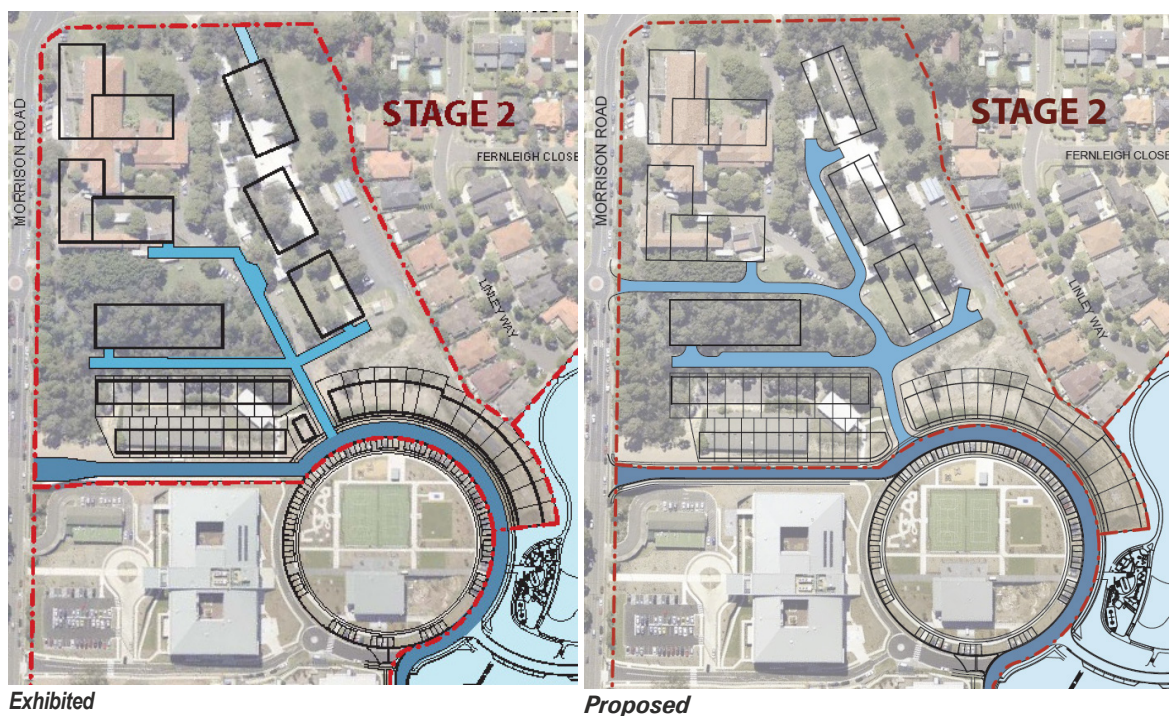


Figure 2 – Comparison of exhibited and proposed street layout

Source: Cox Richardson Architects

3.2.5 Landscaping and Open Space

The amendments described in the sections above, and particularly the increased landscape setbacks to Morrison Road and Princes Street and the amended street layout and access, have resulted in minor changes to the Landscape Concept Plan as illustrated in **Figure 5** below. The inclusion of the new roads to improve access reduces the total open space within Stage 2 by 2,592m² to a total of 74,171m².

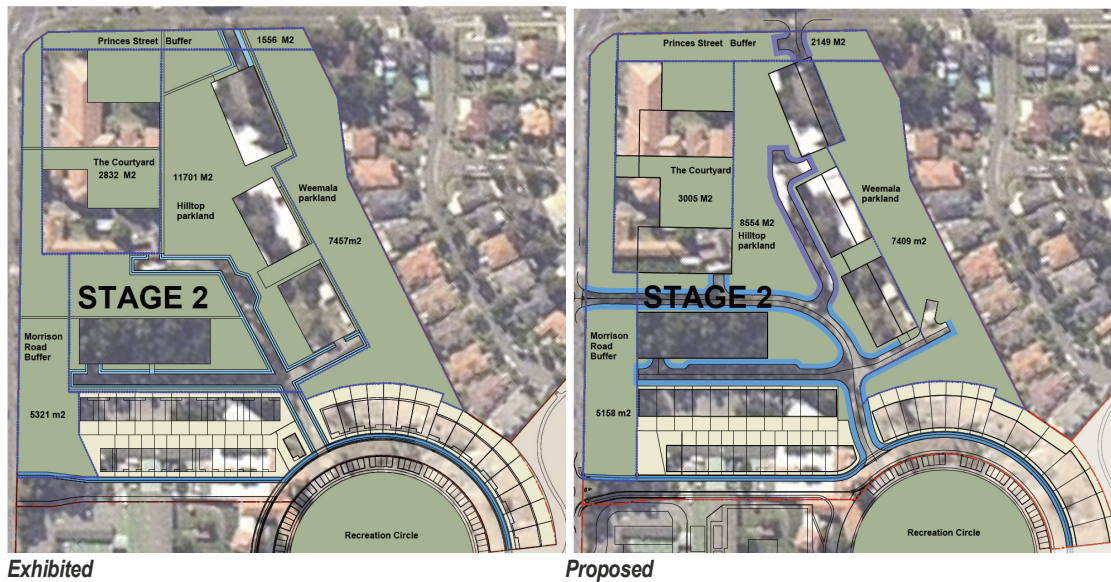


Figure 3 – Comparison of Exhibited and Amended Landscape Concept Plan

Source: Environmental Partnership

3.2.6 Project Implementation

Since the exhibition of the modification application, Frasers Putney have identified that the phasing of development can be delivered in a more efficient and logical manner. As such, the phasing of development within Stage 2 is proposed to be amended as illustrated in **Figure 5**.

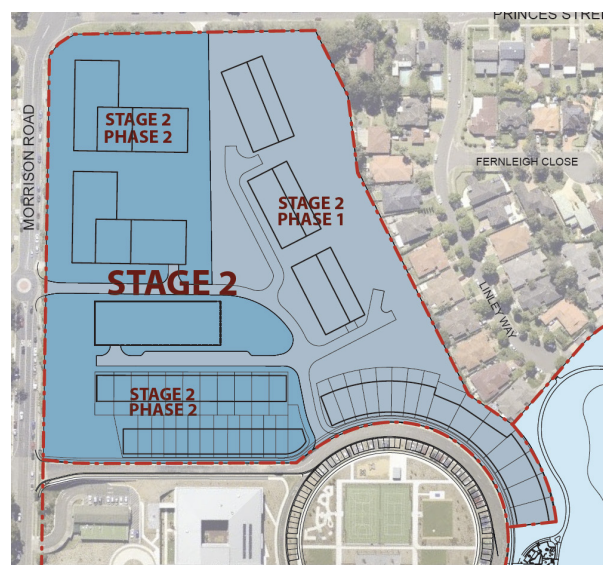


Figure 4 – Amended phasing of Stage 2

3.3 Proposed Modifications to Conditions of Approval (as amended)

The proposed modifications described above necessitate amendments to the approved conditions which are identified below. Words proposed to be deleted are shown in ~~**bold italics strike through**~~ and words to be inserted are shown in **bold italics**.

PART A – ADMINISTRATIVE CONDITIONS

A1. Development Description

*Concept approval is granted only to the carrying out the development described in Volume 1: Urban Design Principles Site Analysis and Development Plan and Volume 2: The Preferred Project Revised Concept Plan, prepared by BSA Architects (December 2005), as amended by the Concept Plan Drawings by Cox Richardson Architects (February 2013), **Concept Plan Drawings by Cox Richardson Architects (May 2014) and Landscape Plan by Environmental Partnership (May 2014)** including:*

- 1) *A new, purpose built specialised rehabilitation and disability facility.*
- 2) *No more than 50 residential dwellings per hectare on land excluding the new, purpose built specialised rehabilitation and disability facility.*
- 3) *Landscaped public and private open space.*
- 4) *Associated services and infrastructure.*
- 5) *Land use distribution, building heights, densities, dwelling mixes and types.*

A2. Development in Accordance with Plans and Documentation

The development shall also be generally consistent with the following plans and documentation:

- 1) *Concept Plan and Environmental Assessment for the Redevelopment of Royal Rehabilitation Centre Sydney Site, prepared by BSA Architects (August 2005).*
- 2) *The Redevelopment of Royal Rehabilitation Centre Sydney Site – Secondary Consultant reports for Concept Plan Submission to DIPNR, prepared by BSA Architects (August 2005).*
- 3) *Preferred Project Report and Statement of Commitments and Proponent's Responses to Exhibition of the RRCS Concept Plan, prepared by BSA Architects (December 2005).*

As amended by the following plans and documentation:

- 1) *Concept Plan Drawings by Cox Richardson Architects (February 2012); and*
- 2) ***Concept Plan Drawings by Cox Richardson Architects (May 2014);***
and
- 3) ***Landscape Plan Drawing by Environmental Partnership (May 2014);***
and
- 4) *S75W Modification to Concept Plan MP05_0001 Report by JBA Urban Planning Consultants dated May 2012 as amended by correspondence from JBA Urban Planning Consultants dated 7 September 2012; 9 November 2012 and 14 February 2013; and*
- 5) ***S75W Modification to Concept Plan MP05_0001 Report by JBA Urban Planning Consultants dated December 2013 as amended by the Response to Submissions report prepared by JBA dated May 2014.***
- 6) *Subdivision Plans prepared by Tasy Moriatis dated 22 February 2013.*

Except for otherwise provided by the plans and documentation described in Condition A1, Part A, Schedule 2 and the Department's conditions of approval as set out in Schedule 2, Part B and the proponent's statement of commitments as set out in Schedule 2, Part C.

C15. Design Excellence Requirements

Future applications shall demonstrate that the built form achieves a high standard of architectural design incorporating a high level of modulation and articulation of the buildings, including the provision of a range of high quality materials and finishes. Future development is to be carried out generally in accordance with the Putney Hill Design Guidelines prepared by Cox Richardson Architects.

4.0 Conclusion

Frasers Putney Pty Ltd and its expert project team have considered all submissions made in relation to the public exhibition of the proposal. A considered and detailed response to all submissions made has been provided within this report and the accompanying documentation.

In responding and addressing the range of matters raised by the Department, Council and the general public, Frasers Putney Pty Ltd has sought to refine the modification. The refined modification also captures changes made by the project team post exhibition.

As outlined within this report, the analysis of the amendments to the proposed modification confirms that all key elements of the proposal as originally proposed and exhibited have remained unchanged.

Further and more importantly, the modification does not substantially differ from the original publicly exhibited proposal. To the benefit of the overall redevelopment, the environmental impacts of the modification remain negligible and on balance will deliver a project which results in an overall improvement to the originally approved Concept Plan. The proposed modification has significant planning merits as it will:

- enable the maximum number of dwellings (791) to be achieved across the Frasers Putney site, contributing to the fulfilment of local and regional dwelling targets and aiding in reducing Sydney's current housing shortage;
- The building layout responds to the constraints and opportunities of the site, reducing the extent of bulk earthworks, capturing views where possible and enhancing the potential amenity for future apartments;
- Increased setbacks from the boundaries will enhance privacy from the future built form on the site to surrounding residents;
- The amended built form will not have any adverse impacts on surrounding residents, with shadows generally contained within the site and the visual scale of the buildings to be softened through articulation and landscaping;
- The quality of the future built form will be to a high standard, continuing the delivery of well-designed and high quality buildings from Stage 1 into Stage 2;
- A greater landscaped setting will be achieved through the possible retention of existing trees and the provision of new landscaping around the periphery of the site;
- A greater quantum of open space at the ground level will be achieved through the amended building layout, promoting active and passive uses for the whole community; and
- The redistribution of dwellings across Putney Hill and the amended access arrangements of Stage 2 will not result in adverse traffic impacts on roads internal or external to the site.

In conclusion, the proposed modification will improve the future built form on the site and will enable the achievement of the envisaged intent for residential development on the site. The modification to the Concept Plan will update the current intent for development on the site and will ensure that Council and the proponent are provided with a clear planning approvals pathway for the future redevelopment.