

# Environmental Assessment Report Concept Plan and Project Application

**Sir Moses Montefiore Jewish Home**  
**100 - 120 King Street and 30 - 36 Dangar Street, Randwick**  
Expansion of an Existing Residential Aged Care Facility  
Including the Construction of Stage 1 of the Development

Submitted to  
NSW Department of Planning  
On Behalf of Sir Moses Montefiore Jewish Home

September 2010 ■ 10040

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This report has been prepared by: Nick Roberts

Signature



Date 08/09/10

This report has been reviewed by: Oliver Klein

Signature



Date 08/09/10

# Statement of Validity

This Environmental Assessment has been prepared and submitted under Part 3A of the *Environmental Planning and Assessment Act 1979* (as amended) by:

## Environmental Assessment

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In respect of	A Concept Plan application and Project Application

## Project Application

Applicant name	Sir Moses Montefiore Jewish Home
Applicant address	100 – 120 King Street and 33 – 36 Dangar Street, Randwick
Land to be developed	Sir Moses Montefiore Jewish Home 100 – 120 King Street and 33 – 36 Dangar Street, Randwick
Proposed development	Concept Plan for the expansion of an existing residential aged care facility including retail space and childcare centre. Concurrent approval is sought for a Project Application for the construction and use of Stage 1 of the Concept Plan development.
Environmental Assessment	An Environmental Assessment (EA) is attached
Certificate	<p>I certify that I have prepared the content of this Environmental Assessment and to the best of my knowledge:</p> <ul style="list-style-type: none"><li>▪ It is in accordance with the Environmental Planning and Assessment Act and Regulation.</li><li>▪ It is true in all material particulars and does not, by its presentation or omission of information, materially mislead.</li></ul>

Signature



Name

Oliver Klein

Date

8 September 2010



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# Executive Summary

## Purpose of this report

This submission to the Department of Planning comprises an Environmental Assessment for a Concept Plan and Project application under Part 3A of the Environmental Planning and Assessment Act (EP& A Act). It relates to the expansion of the Sir Moses Montefiore Jewish Home residential aged care facility, comprising three new building envelopes on-site, landscaping, vehicular access and parking and a landscaped public square. The three new building envelopes will connect to, and be operated in conjunction with, the existing Sir Moses Montefiore Jewish Home residential aged care facility. The redevelopment of an existing childcare centre and the provision of minor retail space are also included in the Concept Plan.

The Project Application relates to the first stage of the development, comprising the construction of a building (Building D) within one of the envelopes proposed by the Concept Plan, as well as a public square and temporary car park.

This submission is in accordance with the Department's guidelines for Concept Plan applications lodged under Part 3A and addresses the issues raised in the Director General's Requirements (DGRs) that have been issued for the environmental assessment of the Concept Plan.

## Overview of Project

This Concept Plan application presents an opportunity to provide aged care accommodation close to medical and other services both on-site and the nearby Prince of Wales Hospital (within 2km of the site) and Randwick Town Centre (within 700m to 1km of the site). The proposal also fulfils directions of the Department of Planning's draft East Subregional Strategy to provide for 'ageing in place'.

The Concept Plan seeks approval for:

- Three new building envelopes having a total of 19,370m<sup>2</sup> of gross floor area (GFA) and being four to six storeys in height with lower level car parking;
- Use of the proposed building envelopes for residential aged care ranging from self care to high level dementia care;
- The redevelopment of an existing childcare centre on the site;
- A public square accessible from Dangar and King Streets;
- Landscaping throughout the site totalling 14,739m<sup>2</sup>;
- Stormwater drainage infrastructure including an on-site detention basin; and
- Retail space provided in a leasable unit at ground level, accessible from the proposed public square.

Approval is also sought for a Project Application for Stage 1 of the Concept Plan, which comprises the construction and use of:

- A new building (proposed Building D) with six storeys including a lower level/basement parking area;
- The proposed public square of 1,080m<sup>2</sup> at the intersection of King and Dangar Streets; and
- A temporary car park within the footprint of proposed Envelope E and improvements to vehicular access to the existing childcare centre on the site.

## The Site

The Sir Moses Montefiore Jewish Home site is located at 100 – 120 King Street and 33 – 36 Dangar Street, Randwick in the Randwick City Council (Council) local government area (LGA). It is owned by Sir Moses Montefiore Jewish Home and comprises a single allotment known as Lot 202 in DP 879576. The site is 29,353m<sup>2</sup> in area and currently accommodates three the existing Sir Moses Montefiore Jewish Home buildings (Buildings A, B and C) and a childcare centre.

## Planning Context

Section 5.0 of this Environmental Assessment Report (EAR) considers all applicable legislation in detail. In general, the proposal is consistent with all relevant planning controls. The proposed residential aged care facility and childcare centre are permissible in the 2B (Residential B) and 2C (Residential C) zones that apply to the site under Randwick Local Environmental Plan 1998 (RLEP 1998) and through the application of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (HSDP SEPP). The proposal meets the objectives of the two zones that apply to the site.

## Environmental Impacts

This EAR provides an assessment of the environmental impacts of the project in accordance with the DGRs and includes a draft Statement of Commitments (see Section 6.0) which sets out the undertakings made by The Sir Moses Montefiore Jewish Home to manage and minimise potential impacts arising from the development (both the Concept Plan and the Stage 1 works).

## Conclusion

The development will serve State, regional and local planning and development objectives by providing aged care housing that will help meet increasing demand for such housing. The development will also result in positive social and economic impacts in terms of the more economic use of presently underutilised land and the location of aged care housing conveniently located to nearby community and medical services.

As demonstrated throughout this report, the Concept Plan and Project Application developments will result in no adverse environmental impacts and performs well in relation to preserving the amenity of surrounding residential properties. On the basis of the merits of the proposed development, its positive social and economic impacts and the absence of resultant adverse impacts, we have no hesitation in recommending that the Minister approve the Concept Plan and Project Application under Section 75E and Section 75O of the EP&A Act.

## 1.0 Introduction

This Concept Plan and Environmental Assessment Report (EAR) is submitted to the Minister for Planning pursuant to Part 3A of the Environmental Planning and Assessment Act 1979 (EP&A Act). This is to fulfil DGRs for the preparation of an Environmental Assessment of a Concept Plan. The redevelopment of a childcare centre and the provision of retail space over 3 stages (over the next 10+ years) are also included in the Concept Plan.

The Concept Plan relates to development for the expansion of the Sir Moses Montefiore Jewish Home through the provision of 19,370m<sup>2</sup> of new GFA that will accommodate residential aged care facilities and ancillary uses.

Approval is also sought for the a Project Application for the construction and use of the first stage of the development, comprising proposed Building D, the public open square, a temporary car park and improved vehicle access to an existing childcare centre on the site.

The Concept Plan seeks to address strategic project issues and establish the key parameters of the development prior to more detailed design work being undertaken.

The report has been prepared by JBA Urban Planning Consultants Pty Ltd, for the proponent, Sir Moses Montefiore Jewish Home, and is based on design information provided by Jackson Teece and supporting technical documents provided by the expert consultant team.

This EAR describes the site, its environs and the proposed development and includes an assessment of the proposal in accordance with the DGRs under Part 3A of the EP&A Act. It should be read in conjunction with the information contained within specialist studies appended to this report. These studies address the DGRs for the project. The studies provide a technical assessment of the environmental impact of the proposed development, and recommend mitigation measures to manage potential environmental impacts associated with the proposal.

### 1.1 Overview of Approval Sought

The Concept Plan seeks approval for the expansion of the Sir Moses Montefiore Jewish Home including:

- Three new building envelopes totalling 19,370m<sup>2</sup> of GFA (to a total of 38,394m<sup>2</sup> on the site) and being between four and six storeys in height. Two of the proposed envelopes (Envelopes D and E) will connect with the existing buildings on the site;
- The construction of an additional level on an existing building on the site (Building C) and reconfiguration of floorplans and uses within the building;
- Use of the proposed new building envelopes for residential aged care including serviced self-care units, low-level care, special / dementia care, dining rooms, kitchens, physical therapy and exercise facilities ("wellness centre") and other support services;
- The redevelopment of an existing childcare centre on the site and the provision of a car park and vehicular access associated with the childcare centre;
- Additional car parking for 57vehicles. This will bring the total parking provision on-site to 212 vehicles;
- A public square accessible on Dangar Street;
- 350m<sup>2</sup> of retail GFA located at ground level and accessible from the public square; and
- Landscaping throughout the site and stormwater drainage infrastructure including an on-site detention basin.

Approval is concurrently sought as part of the Concept Plan approval for the construction and use of Stage 1 of the Concept Plan, which comprises of:

- Building D (within new Envelope D) up to five storeys in height. The new building will include residential aged care accommodation and associated support services, retail unit and lower level parking facilities;
- The proposed public square, being 1,080m<sup>2</sup> in area; and
- Construction of a temporary car park within the footprint of proposed Envelope E. The temporary car park will be utilised until a building is constructed within Envelope E and will meet demand generated by proposed Building D.

Plans of both the Concept Plan and Stage 1 Project Application are included in **Appendices Volume 2** that accompanies this report. **Appendices Volume 2** includes Site Surveys (**Appendix A**), Site and Locality Plans (**Appendix B**), Architectural Plans for the Concept Plan (**Appendix C**), Architectural Plans for the Project Application (**Appendix D**), Landscape Plans (**Appendix E**), Shadow Diagrams (**Appendix F**), Photomontages (**Appendix G**), Schedule of Colours and Materials (**Appendix H**).

Further stages of the Concept Plan (in addition to Stage 1, which is the subject of the Project Application), will be the subject of subsequent Development/Project Applications for the detailed design of the various components of the development.

## 1.2 Background and Environmental Assessment and Approvals Process

### Previous Planning for the Site

Planning for the use of the site for residential aged care has been ongoing since July 2001, when a masterplan was adopted by Council. The proponent of the 2001 masterplan decided not to proceed with the development of the entire site and a revised masterplan was submitted and adopted in April 2002. Following further design reconfigurations, a third masterplan for the Sir Moses Montefiore Site was submitted and adopted in August 2002 (and is included at **Appendix I**).

A DA was subsequently lodged for a residential aged care facility on the site, in accordance with the August 2002 masterplan (DA0551/2002). Council granted consent to the DA on 22 October 2002. The DA was subject to several modifications under Section 96 of the EP&A Act. The Sir Moses Montefiore Jewish (Aged Care) Home has been constructed on the site and commenced operation in 2007.

In accordance with a resolution of Council, the August 2002 masterplan lapsed after 5 years on 27 August 2007.

In August 2003, an amendment to the Randwick Local Environmental Plan 1998 (RLEP 1998) was gazetted allowing the development of local shops at the intersection of King and Dangar Streets on the site, totalling no more than 350m<sup>2</sup> GFA.

### Previous Stage 1 Development Application (DA)

In accordance with Section 83B of the EP&A Act, a Stage 1 DA (DA 816/2008) for the extension of the existing Sir Moses Montefiore Jewish Home was lodged with Council in November 2008 and exhibited in early 2009. The Stage 1 DA (in lieu of Council's masterplan requirement under RLEP 1998) sought consent for additional building envelopes to accommodate the expansion of existing facilities on the site.

In September 2009, Council requested that the Stage 1 DA be withdrawn. This request was made following extensive discussion between Council and the proponent regarding design amendments and further information relating to the DA. Based on this discussion, Council formed the opinion that the design amendments had rendered the proposal sufficiently different from the original design to warrant the withdrawal of the application. The Stage 1 DA was consequently withdrawn.

Prior to the withdrawal of the Stage 1 DA, the proponent sought a Site Compatibility Certificate for the project under clause 25(4)(a) of the State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (HSDP SEPP). Consequently, a Site Compatibility Certificate was issued by the Department on 14 August 2009 (**Appendix J**). The certificate acknowledges that the site is suitable for more intensive development and that development for the purpose of seniors housing of the kind proposed by the Stage 1 DA is compatible with the surrounding environment having regard to the criteria in clause 25(5)(b) of the HSDP SEPP.

It is noted that the Certificate included allowance for a floor space ratio bonus of up to 0.5:1 on the site on the basis that the proposed development is a 'vertical village' in accordance with clause 45 of the HSDP SEPP.

### Part 3A Application

Since the Stage 1 DA was lodged in 2008, amendments to the Major Development SEPP were made in July 2009. These amendments included changes to Capital Investment Value (CIV) thresholds under clause 13 of Schedule 1 - Classes of Development. (Schedule 1 identifies development to which Part 3A of the EP&A Act applies, and for which the Minister is the consent authority). Pursuant to the changes to the SEPP, it became mandatory that residential, commercial or retail projects with a CIV of \$100 million or more are Major Developments.

As the proposed development has a CIV of almost \$137 million (refer to the Quantity Surveyors' Report by Rider Levett Bucknall at **Appendix K**) it is a Major Development. Therefore, once the Stage 1 DA had been withdrawn as per Council's request, the proponent became obliged to lodge a new application under part 3A of the EP&A Act.

A request for consideration of the proposal under Part 3A of the EP&A Act was made to the Department on 25 September 2009. Accordingly, in correspondence dated 4 December 2009, the delegate of the Minister confirmed that the opinion had been formed that the proposal was a Major Development under the Major Development SEPP and so was a project to which Part 3A applies. DGRs for the project were subsequently issued by the Department of Planning on 21 April 2010. A copy of the DGRs is included in **Appendix L**.

This report constitutes the Environmental Assessment Report (EAR) for a Concept Plan application and Project Application for the site.

## 1.3 Project Need and Alternatives

The need for the project can be understood in the context of the future growth of and demographic trends within the Sydney Metropolitan Region, as anticipated by the Department of Planning's Sydney Metropolitan Strategy. The Strategy acknowledges that Sydney's population is ageing, with a resultant increase in demand for appropriate housing.

The Department of Planning's draft East Subregional Strategy implements the Metropolitan strategy at a subregional level and notes that some 18% of the subregion's population will be greater than 65 years of age by 2031. The draft Subregional Strategy finds that an appropriate location for seniors' housing is close to both Randwick shopping centre and the medical facilities hub at the Prince of Wales Hospital.

The Department of Planning's *NSW Statistical Local Area Population Projections* released in April 2010 forecasts population trends to 2036. The projections anticipate that the proportion of people aged 65 and over within the East Subregion's population will increase to 19% by 2036 from 9% in 2006. By comparison, the proportion of people 65 and above in the Sydney metropolitan area by 2036 is projected to be marginally lower, at 17%. The Department of Planning projections anticipate an increase in the proportion of those aged 75 and over in the subregion, rising from 4.3% in 2006 to 10.5% in 2036.

The need for the proposed development is therefore predicated on the increased demand for diversity in housing types and in particular for accommodation suitable for seniors. The type of development proposed is also needed on the site in order to achieve the objective of allowing people to "age in place", close to existing community and family ties, which is also identified by the Sydney Metropolitan Strategy.

It is considered that there is a general lack of alternative sites within the same ring around Randwick shops and the medical hub that would enable the achievement of key strategic outcomes.

## 1.4 Project Team

An expert project team has been formed to deliver the project and includes:

<b>Proponent</b>	Sir Moses Montefiore Jewish Home
<b>Project Management</b>	McLachlan Lister
<b>Urban Planning</b>	JBA Urban Planning Consultants
<b>Architecture</b>	Jackson Teece Architects
<b>Quantity Surveyors</b>	Rider Levett Bucknall
<b>Geotechnical</b>	Jeffery and Katauskas
<b>Landscape Architect</b>	Oculus Landscape Architecture
<b>Stormwater</b>	Emerson Associates
<b>Traffic and Transport</b>	Halcrow MWT
<b>European Heritage</b>	Clive Lucas, Stapleton & Partners
<b>Environmental Engineering</b>	Cetec
<b>Site Auditing</b>	C. M. Jewell & Associates
<b>Electrical and Mechanical Engineering</b>	Medland Metropolis
<b>Hydraulic Engineering</b>	DP Consulting
<b>Soil Salinity</b>	Environmental Investigation Services
<b>Construction Management Plan</b>	McLachlan Lister
<b>Environmentally Sustainable Development</b>	Cundall Associates

## 2.0 Site Analysis

### 2.1 Site Location and Context

The Sir Moses Montefiore Jewish Home site is located at 100 – 12- King Street and 33 – 36 Dangar Street, Randwick in the northern extent of the Randwick City Council LGA. It is located conveniently to the Randwick Town Centre (approximately 700m to 1km) to the southeast and the Prince of Wales Hospital (approximately 2km to the south).

The site sits within an established urban area that is undergoing renewal and regeneration and is flanked by a mix of land uses and development types. These development types include older one to two storey residences, mid to late 20<sup>th</sup> century walk up flats and recent town house/apartment developments that are emerging as the established pattern of new development in the block to the east of the site. The site's locational context is shown at **Figure 1** and an aerial photograph showing the boundaries of the site is included at **Figure 2**.

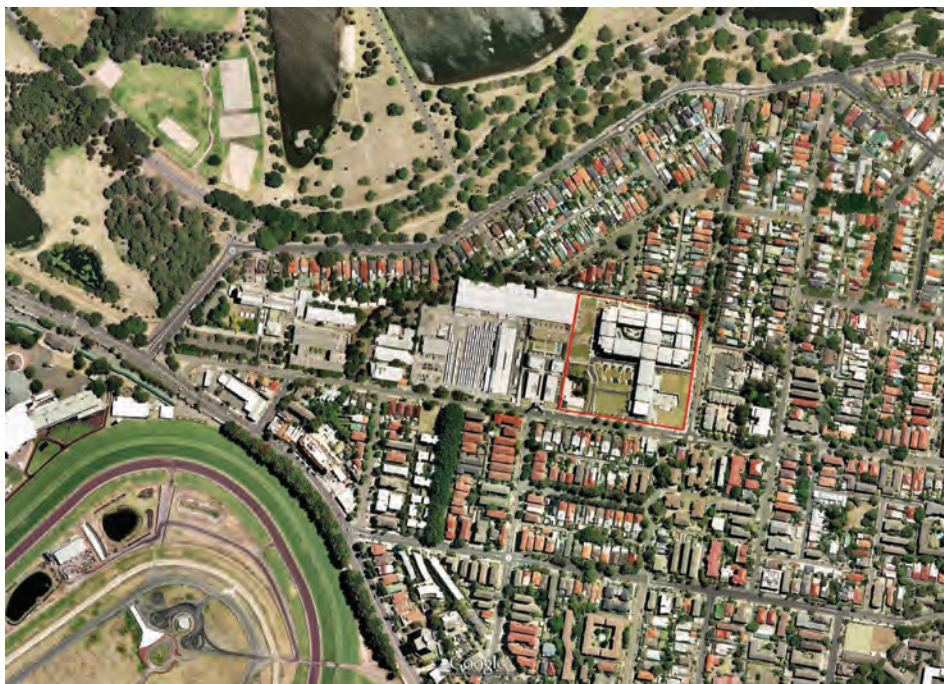
As indicated in **Figure 3**, the site is within the eastern portion of an institutional precinct between Darley Street in the west and Dangar Street to the east. The precinct comprises of larger developments occupied by the University of New South Wales (UNSW), State Transit Authority (STA) and the Randwick TAFE.





**Figure 1 – Locality Plan**  
 Source: Jackson Teece





**Figure 2** – Aerial photograph of the site and the surrounding area  
Source: Google Maps



**Figure 3** – The site and adjacent institutional precinct  
Source: Jackson Teece

## 2.2 Site Description

The site is 29,353m<sup>2</sup> in area, with a 180m primary frontage to King Street to the south and a 165m frontage to Dangar Street to the east. The Sir Moses Montefiore Jewish Home owns the entire site, which comprises a single allotment known as Lot 202 in DP 879576.

The site is accessible via a vehicle crossing from King Street and internal roadway to the south of the site, a porte cochere, also accessible from King Street and a vehicle crossing and internal roadway from Dangar Street.

The land slopes down from the site's northern and southern boundaries to form a natural basin at centre of the western end of the site. Levels along the northern boundary of the site typically range from 40.5m AHD to the west up to 44.5m AHD to the east. Along the southern boundary, levels range from around 40m to 45.5m AHD from west to east. Levels in the natural basin at the centre/west of the site are as low as around 37m AHD.

Levels across the site vary from between RL 38 and RL45 AHD along the northern and southern boundaries and RL37 to RL44 AHD within the basin of the site.

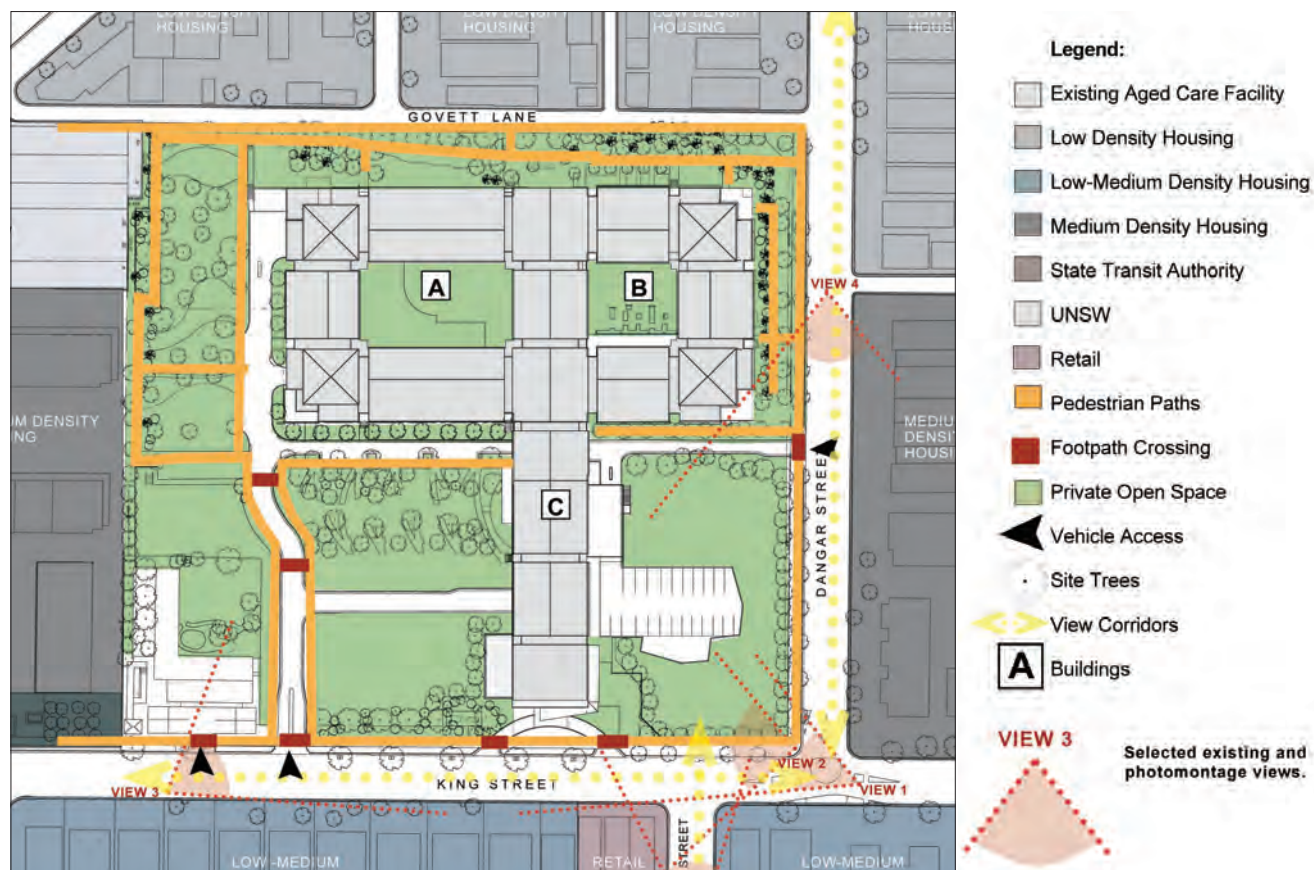
The northern portion of the site is predominantly occupied by the existing residential aged care facility. One of the buildings that comprises the existing development extends into the southern portion of the site, which otherwise comprises landscaped area. A stormwater detention basin is located in the natural basin in the western portion of the site and is incorporated into on-site landscaping.

A photograph of the site from the corner of King and Dangar Streets is included at **Figure 4**. An Site Analysis Plan of existing development on the site is provided at **Appendix C** and reproduced at **Figure 5**.



**Figure 4** – The site viewed from the corner of King Street and Dangar Street looking northwest  
Source: Jackson Teece





**Figure 5 – Site Analysis Plan**  
Source: Jackson Teece

## 2.2.1 Existing Development

The existing residential aged care facility on the site comprises three buildings (Buildings A, B and C), which range from 3 to 5 storeys in height and comprise a total of approximately 19,024m<sup>2</sup> of GFA. Buildings A and B are located in the northern portion of the site. Basement/lower level parking is located in Building A and C. Car parking spaces are also located in a hardstand area within the footprint of proposed Building D in the south east corner of the site.

The Dangar Street frontage is characterised by the facade of Building B, landscaping in the building's eastern setback and the turfed area within the south eastern corner of the site. The view across the site towards Buildings B and C from Dangar Street is shown in **Figure 6**.

Existing Building C extends south to the site's King Street frontage, where it is accessible via a porte cochere. A view of existing Building C within the site's King Street frontage taken from the intersection of King and Church Streets looking north is included at **Figure 7**. The existing childcare centre is located in the western portion of the site fronting King Street. The facades of Building C and the childcare centre and landscaped areas in the southern portion of the site define the character of the site's King Street frontage. The site's Govett Lane (northern) frontage is shown in **Figure 8** and includes the 2 to 4 storey facades of Buildings A and B and landscaped areas/ recreation space within the site's northern setback.

The site's sloping topography generally allows greater building heights to be accommodated at the centre of the site while reducing apparent building heights at the King Street and Dangar Street frontages.

The existing buildings are surrounded by extensive landscaped open space (**Figure 9**). Building heights across the site are indicated in **Figure 10**.

Vehicular access into the aged care facility is available via two vehicle crossings – one at the western end of the King Street frontage, the other at the centre of the Dangar Street frontage. Vehicular access to the childcare centre is also provided via the vehicle crossing from King Street.

Pedestrian access to the aged care facility is available via the Dangar Street entrance. Access to the aged day care centre is via the King Street entrance, which includes a porte cochere that accommodates buses stopping to drop off visitors to the day care facility. Pedestrian access to the childcare centre is also from King Street.



**Figure 6** – View across the eastern portion of the site towards Buildings B and C from Dangar Street looking west  
Source: Jackson Teece



**Figure 7** – The site's King Street frontage including Building C viewed from the intersection of King and Church Streets looking north  
Source: Jackson Teece

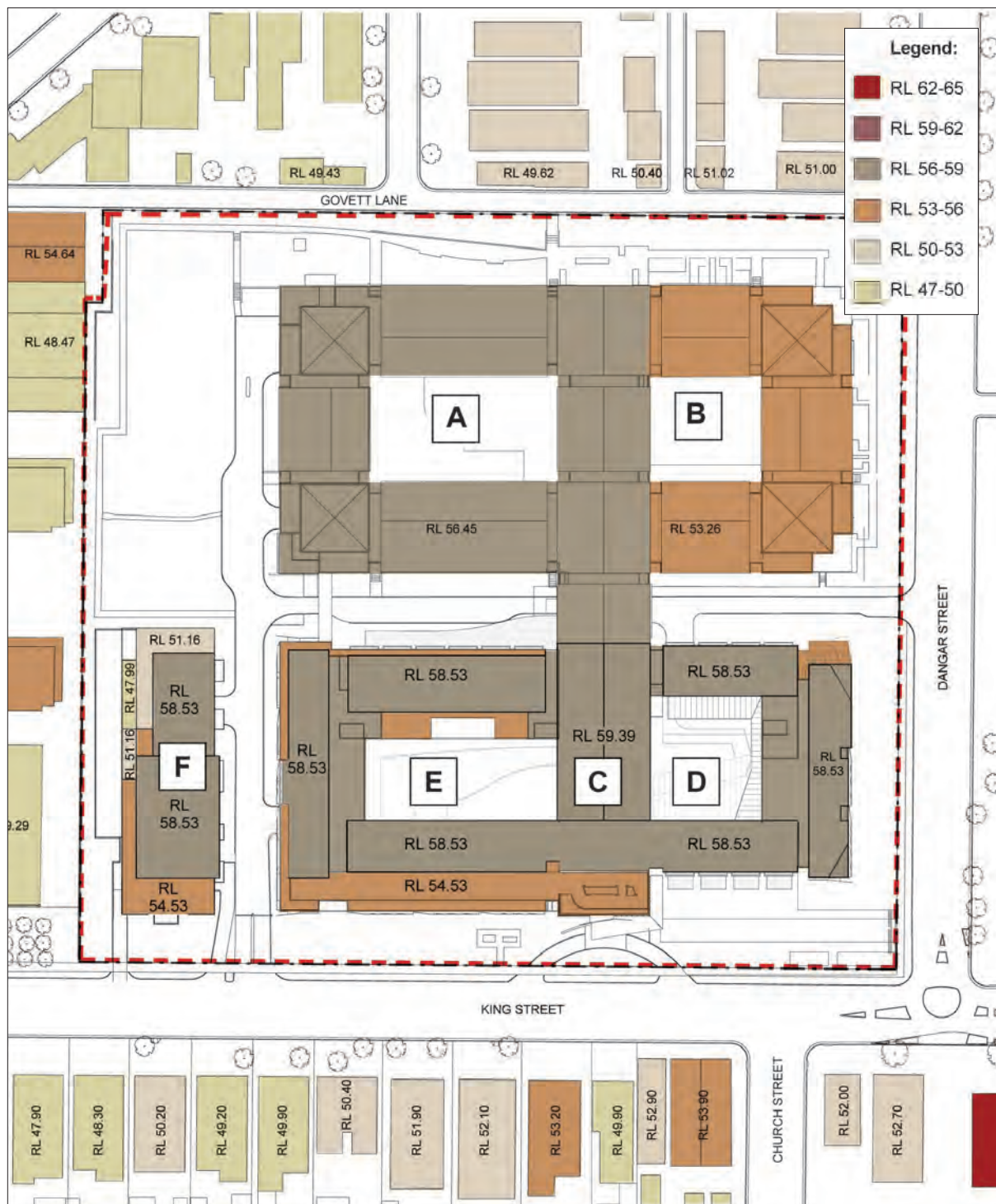




**Figure 8** – The site's Govett Lane frontage  
Source: Jackson Teece



**Figure 9** – Landscaped area on the site looking southwest from the centre of the site  
Source: Jackson Teece



**Figure 10** – Plan of existing building heights across the site and its environs  
Source: Jackson Teece

## 2.2.2 Existing Aged Care Facilities

The existing Sir Moses Montefiore Jewish Home provides residential aged care for 276 residents. The facility offers a range of care options and services, including hostel/low-level care, nursing home/high-level care (for frail or physically dependent residents), high and low special care units for residents with dementia and other cognitive impairments and respite care (short-term accommodation). The facility includes the following services and infrastructure:

- Kitchens and laundries;
- Dining rooms and café;
- Hairdressing salon / boutique;
- GP consulting rooms and a dental surgery;
- Physical therapy centre and hydrotherapy pool;
- Recreation rooms;
- Day Centre for elderly residents in the community; and
- On-site car parking on the ground/lower levels for staff, visiting GPs and other medical practitioners, visitors and the few residents that drive (147 spaces in total).

## 2.3 Surrounding Development

The site is within an established urban area that is undergoing some renewal and regeneration. To the north of the site, on the opposite side of Govett Lane is a low density residential area predominantly comprising single dwelling houses. The Govett Lane residences form the southern extent of the North Randwick Heritage Conservation Area (identified by Council's North Randwick Heritage Conservation Area Development Control Plan (DCP), which extends north to Darley Road and East to Avoca Street.

King Street to the south of the site is characterised by older semi-detached houses between numbers 59 and 99 (**Figure 11**) and walk-up style residential flat buildings.

The block to the east of Dangar Street opposite the site has undergone a process of transition from low density residential development, with townhouse/apartment developments having become part of the established pattern (refer to the example at **Figure 12**).

Immediately to the west of the site is a recent residential flat development at 90 - 98 King Street comprising of buildings between 3 and 4 storeys and approximately 11m in height (**Figure 13**). Also immediately to the west is a steel clad building approximately 15m in height that is occupied by the University of New South Wales (UNSW) (**Figure 14**). A Statement of Heritage Impact has been prepared by Clive Lucas, Stapleton and Partners (provided at **Appendix M**).

The assessment finds that the steel clad UNSW building is part of the former bus depot that occupied the site and the adjacent land to the west in the 19th and 20th centuries. Also to the west of the site is a residential flat building 5 storeys and 17.2m in height. As discussed in Section 2.1, the institutional precinct between Darley Street in the west and Dangar Street extends further to the west. It is reasonable to say that the pattern of development in this part of Randwick is diverse with a range of development types, uses, heights and densities.





**Figure 11** – Older semi-detached residences on King Street to the south of the site looking east  
Source: Jackson Teece



**Figure 12** – Townhouse development at on Dangar Street looking southwest  
Source: Jackson Teece





**Figure 13** – Residential flat development at 90 - 98 King Street looking south west across the site's western boundary  
Source: Jackson Teece



**Figure 14** – UNSW campus building immediately to the west of the site  
Source: Jackson Teece

## 2.4 Summary of Site Opportunities and Constraints

The main opportunities presented by the site include:

- The extension of the existing aged care services in response to increasing demand;
- The proximity of health and community services at Randwick town centre (within 700m to 1km) and the nearby health hub surrounding the Prince of Wales Hospital. These facilities will support future residents on the site in “ageing in place”, in accordance with NSW Government planning policy;
- Existing aged health care facilities on-site. New residents will both benefit from existing facilities and increase the commercial viability of the provision of further services;
- Bus services on King Street;
- Existing utilities and services are available on-site for connection/ augmentation; and
- The topography of the site, which slopes down from King and Dangar Streets. This allows taller buildings to be located at the centre of the site without resulting in adverse amenity impacts to surrounding properties and reduces apparent building heights when viewed from the Dangar and King Street frontages.

The main constraints to development on the site are as follows:

- Overland flow paths within the site and engineering solutions that have been implemented to prevent stormwater runoff resulting in adverse downstream impacts;
- Relatively low density residential character developments on the southern edge of King Street;
- The proximity of residential apartments at 90 – 98 King Street to the west of the site and the need for development on the Montefiore site to preserve an appropriate setback and resultant level of solar amenity and privacy to adjacent dwellings;
- The need to preserve an appropriate level of solar amenity to residential developments to the south of King Street; and
- Traffic flows on King and Dangar Streets and surrounding intersections and off-street parking that must be considered by future development on the site.

The opportunities and constraints applying to the site have been addressed in the design described in the subsequent chapters of this report.

## 3.0 Concept Plan

The Concept Plan establishes the vision and planning and development framework which will be used by the approval authority to assess future development proposals within the Sir Moses Montefiore Jewish Home site. It articulates what Sir Moses Montefiore Jewish Home is seeking to achieve for future development and sets the broad parameters for the development of the site.

### 3.1 Concept Plan Vision and Design Principles

The Concept Plan seeks to address the environmental setting and technical challenges of the Sir Moses Montefiore Jewish Home site to deliver the proposed expansion of the residential aged care facility. To this end, the proponent has formulated a series of design principles that underpin the Concept Plan. These principles are reflected in the Design Verification Statement provided in accordance with State Environmental Planning Policy No 65 -Design Quality of Residential Flat Development State (SEPP 65) at Appendix C and are as follows:

- Built form should take into account the variety of adjacent built features of the area;
- Development should respond to the residential character of Dangar and King Streets and link with the existing scale of the Aged Care Facility;
- Development should address the existing retail premises at the corner of Church and King Street while respecting the residential nature of Dangar Street;
- The Concept Plan should provide a transition from the more industrial / educational / institutional scaled buildings to the west to the medium density housing forms to the east;
- The vista along Church Street must be considered by development on the site and an appropriate character provided at the termination of this vista;
- Natural light and suitable outlook for residences of the development should be provided;
- Best practice standards in Ecologically Sustainable Design (ESD) should be implemented and development should minimise energy and water usage;
- Landscape zones will have differing characters depending on their function, size, orientation, location and relationship to buildings and streets; and
- Quality outdoor space for residents is to be provided throughout the building.

### 3.2 Concept Approval

The Concept Plan applies to the entire Sir Moses Montefiore Jewish Home site, including the existing residential aged care facility and the proposed development. Concept Plan approval is sought for:

- New Envelopes D, E and F of between four and six storeys in height. THE location of these envelopes is indicated at **Figure 15**;
- An additional level (level 6) to be added to existing Building C for the provision of residential aged care accommodation and associated facilities;
- Reconfiguration of layouts in existing Building C including the installation of a cogeneration facility to generate electricity from waste heat from gas water heating systems;
- A total GFA of 19,370m<sup>2</sup> for new Envelopes D, E and F and the additional level/alterations to Building C;

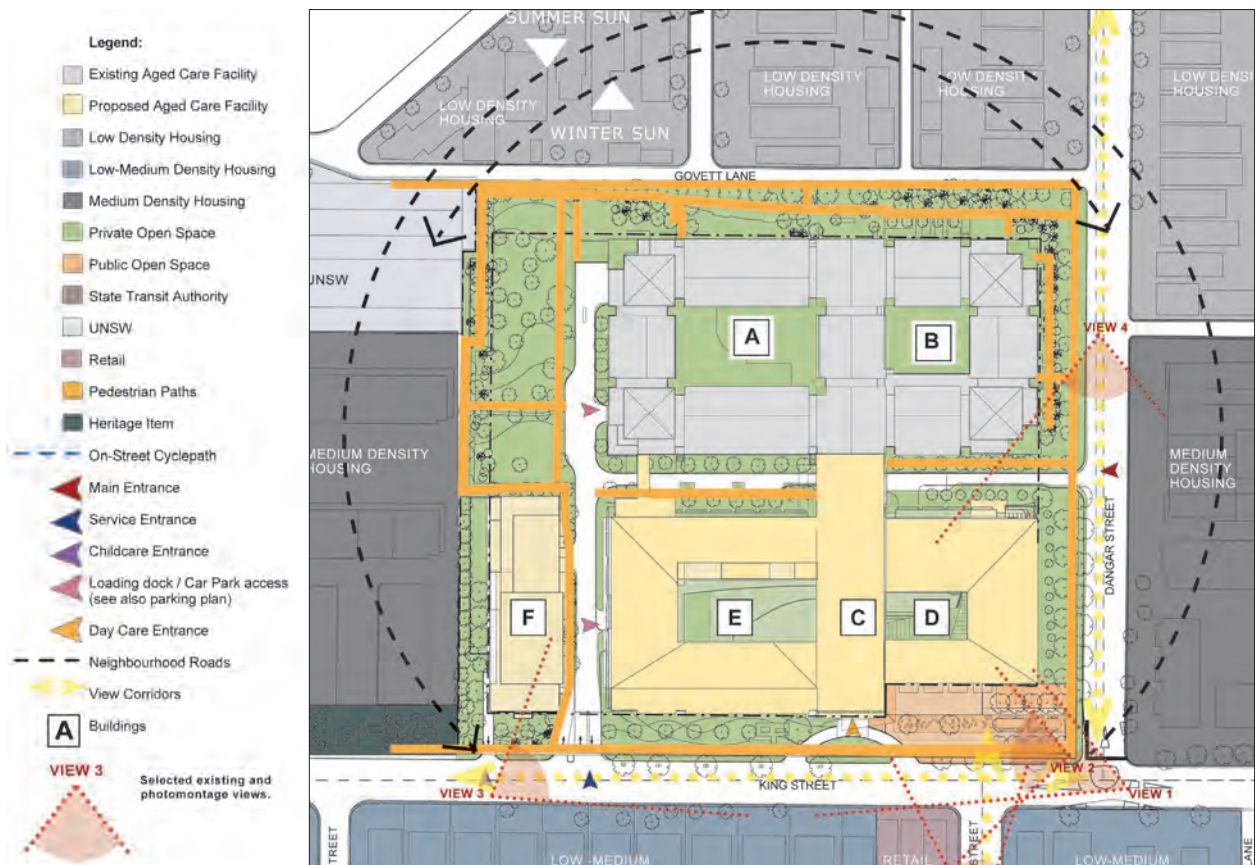
- Use of the proposed new Envelopes D and E and the additional level of existing Building C for the following types of care and support services:
  - Low-level care for residents who require some assistance with daily activities;
  - High-level care for frail or physically dependent residents requiring a higher level of nursing care;
  - Low and high level dementia care;
  - Dining rooms;
  - Kitchens and laundries;
  - A “Wellness Centre” with physical therapy and exercise facilities including a swimming pool;
  - Additional daycare facilities;
  - A recreation room;
  - Administration offices; and
  - Plant rooms.
- The provision of the following uses in new Envelope F:
  - Serviced self-care units; and
  - A new childcare centre to replace the existing centre on the site;
- New car parking spaces for 57 vehicles located at the lower / basement levels of new Envelopes D, E and F to bring the total number of spaces on-site to 212;
- Loading docks, stores and cool rooms at basement/lower levels of new Envelopes D and E;
- An undercroft car parking area beneath Envelope F for the redeveloped childcare centre and a hardstand car park in the setback of Envelope F from King Street;
- Improvement of vehicular access to the childcare centre through the addition of a second vehicle crossing from King Street to provide an internal one way access / drop of road;
- An area of public open space in the form of a plaza 1,080m<sup>2</sup> in area at the King Street frontage of Building D;
- Approximately 350m<sup>2</sup> of retail GFA on level 3 of proposed new Building D (noting that level 3 will be at street level at the King Street frontage). The retail floor area will be accessible from and connect with the public square;
- Landscaping throughout the site including internal courtyards, rooftop terraces, turfed areas and perimeter planting;
- A “service tunnel” comprising an underground corridor and service lift that provide efficient access from the main kitchen and laundry in Building A to the new buildings in Envelopes D and E;
- Stormwater drainage infrastructure including an on-site detention basin and rainwater tanks for the collection of rainwater for use both in the building and for irrigation of landscaped areas.

A numerical overview of the land uses, building heights and floor areas for which Concept Plan approval is sought is included in **Table 1**. A photomontage of the site’s King Street frontage including the proposed development is reproduced at **Figure 16**.

**Table 1 – A numerical overview of the Concept Plan**

Development Element	Proposed
Proposed land uses	Principally residential aged care facility, childcare centre and ancillary retail space
Site area	29,353m <sup>2</sup>
<b>Floor areas and FSRs in accordance with HSDP SEPP definitions</b>	
Existing GFA	19,024m <sup>2</sup>
Total proposed GFA	19,370m <sup>2</sup>
Proposed GFA by use	Residential aged care: 17,210m <sup>2</sup> Childcare Centre: 660m <sup>2</sup> Retail: 350m <sup>2</sup>
Existing FSR	0.65:1
Proposed total FSR	1.31:1
<b>Floor areas and FSRs in accordance with RLEP 1998 definitions</b>	
Proposed Total GFA	44,547
Proposed GFA in Residential 2B zone	29,311 (approx)
Proposed GFA in Residential 2 C zone	15,236 (approx)
Proposed total FSR	1.52
Proposed FSR in Residential 2B zone	1.53 (approx)
Proposed FSR in Residential 2C zone	1.49 (approx)
<b>Height</b>	
Height in storeys	4 to 6 storeys (variable)
Height	Max. level for Concept Plan including plant and equipment and Project Applications: 59.6m AHD Max building height: 20.5m
<b>Uses and Employment</b>	
Accommodation	Serviced self-care units: 35 Low level care: 126 beds High care: 57 Special care/dementia care: 93 beds
Childcare	Up to 50 places
Potential jobs	89 (approx.), bringing the total on-site to 289 (approx.)
<b>Parking</b>	
Additional car parking	57 spaces
Proposed total car parking on-site	212 spaces
<b>Landscaping</b>	
Landscaped Area	14,739m <sup>2</sup> (50% of site area)
Landscaped Area Over Podiums	2,958m <sup>2</sup> (20% of total landscaped area)





**Figure 15** – Site analysis plan showing the location of existing and proposed development  
Source: Jackson Teece



**Figure 16** – Indicative King Street frontage with Building D in the foreground  
Source: Jackson Teece

### 3.3 Stage 1 of the Concept Plan

Consent is concurrently sought for a Project Application for Stage 1 of the Concept Plan as a Project Application. Accordingly, consent is also sought for:

- The construction of proposed Building D, which will be up to five storeys in height, to a level of RL59.6AHD, including rooftop plant and lift overruns. This results in a maximum building height of 9.53m at the south eastern corner of Building D to 13.8m at the western end of the building;
- Reconfiguration of uses within Building C;
- The construction of lower level parking (on level 2) within proposed Building D that will connect with the existing lower level car parking area in existing Building C;
- Staff change room facilities, toilets, laundry facilities, loading area, lift lobby and store rooms to be included in the building on the lower level (level 2);
- The demolition of existing internal walls and removal of car parking spaces on level 2 of building C and their replacement with a cogeneration plant for the generation of electricity using heat given off from an existing gas water heating system on the site, plant rooms, store rooms and new, reconfigured car parking spaces;
- Dementia care rooms (low and high level), each with toilet and bathroom facilities throughout levels 3 (ground floor), 4 and 5 and 6 of proposed Building D;
- Communal lounges, kitchens and dining areas on levels 3 (ground floor), 4, 5 and 6 of proposed Building D for use by residents and staff, along with administration offices, staff rooms, store rooms, laundries and other support services;
- A landscaped courtyard at the centre of level 3 (ground floor) of Building D, which will be accessible from the internal floor area of the building;
- Open space terraces at levels 4, 5 and 6 located in a central atrium above the ground floor courtyard of Building D. Each terrace will project into the atrium so as to be “tiered”, one above the other.
- Rooftop terraces on levels 5 and 6;
- A public square of 1,080m<sup>2</sup> in area at the frontage of Building D at the intersection of King and Dangar Street, including paved area, landscaping, public seating and planted trees;
- A retail unit on the ground floor of Building D adjacent to and accessible from the public with a GFA of 350m<sup>2</sup>. It is intended that the retail unit will accommodate a cafe/deli with outdoor seating in the adjacent public square;
- Construction of a temporary car park within the footprint of proposed Envelope E comprising 18 spaces. The temporary car park will be utilised until Envelope E is constructed and will meet demand generated by proposed Building D; and
- Stairwells and lift cores.

**Table 2** includes a numerical summary of the land uses, building heights and floor areas included in Stage 1 of the Concept Plan. Construction is anticipated within two years of Concept Plan approval.

**Table 2 – Numerical Summary of Building D (Stage 1 of the Concept Plan)**

Level	Proposed Use	Quantum
Proposed Building D		
Level 2 (lower level)	- Staff change room, laundry, loading area and lift lobby	247m <sup>2</sup>
	- Car parking	33 spaces
Level 3	- Dementia Care; - Communal lounges, kitchens, dining areas, offices, staff rooms, store rooms, laundries and other support services; and - Retail space fronting public square (350m <sup>2</sup> ).	1,425m <sup>2</sup> GFA
	- Public square.	1,080m <sup>2</sup>
Level 4	- Dementia Care (high level); and - Communal lounges, kitchens, dining areas, offices, staff rooms, store rooms, laundries and other support services.	1,021m <sup>2</sup> GFA
Level 5	- Dementia Care (high level); - Communal lounges, kitchens, dining areas, offices, staff rooms, store rooms, laundries and other support services; and - Rooftop terraces.	1,406m <sup>2</sup> GFA
Level 6	- Dementia Care (low level); - Communal lounges, kitchens, dining areas, offices, staff rooms, store rooms, laundries and other support services; and - Rooftop terraces.	1,130m <sup>2</sup> GFA
Total		5,229m <sup>2</sup>

**Note:** Figures for GFA and height in Table 1 are based on definitions contained in clause 3 of the HSDP SEPP. (Referring to Section 1.2, under clause 25(4)(a) of the HSDP SEPP, a Site Compatibility Certificate was issued for a previous design for the development that was the subject of the Stage 1DA. The Site Compatibility Certificate allowed for a floor space ratio bonus for the site of up to 0.5:1). In accordance with Clauses 45 (4) and 45 (12) of the SEPP, in calculating GFA for the purposes of granting the floor space bonus, floor area used to deliver on-site support services (as defined therein) is to be excluded.

\*The staff facilities on level 2 have been excluded from GFA calculations for the site in accordance with Clause 45 (4) and (12) of the HSDP SEPP.

### 3.4 Indicative Project Staging

Referring to the Staging Plan at **Appendix C**, the Concept Plan will be developed in three stages, as described below.

#### Stage 1 – Construction within 2 years of Concept Plan approval

Timeframes for Stage 1 will include:

- Proposed Building D;
- Construction of a temporary car park within the footprint of proposed Envelope E; and
- Arrangements and timeframes for the relocation of existing uses within existing Building C to allow for the proposed reconfiguration/renovation works.



## Stage 2 – Construction within 5 to 10 years of Concept Plan approval

Stage 2 includes:

- The construction of proposed Envelope E;
- The addition of a floor to existing Building C; and
- Renovations to existing Building C and reconfiguration of floor space within.

## Stage 3 – Construction within 10+ years of Concept Plan approval

Included in Stage 3 of is the construction and use of Envelope F, which will include:

- The proposed childcare centre;
- Undercroft and hardstand parking and the improvement of vehicular access to the childcare centre through the addition of a second vehicle crossing from Dangar Street to provide an internal one way access / drop of road;
- Seniors self-care accommodation.

## 3.5 Proposed Accommodation

In accordance with clause 11 of the HSDP SEPP, the Sir Moses Montefiore Jewish Home is a '*residential care facility*' as it offers accommodation for seniors that includes meals and cleaning services, personal care and nursing care and has appropriate staffing, furniture, furnishings and equipment, but is not a dwelling, hostel, hospital or psychiatric facility. Referring to the project description and **Table 1**, the proposal is predominantly for the future expansion of the residential care facility use on the site, with most of the proposed accommodation being low-level care, high-level care or dementia specific care.

The levels of residential care facility accommodation to be provided on the site can be summarised as follows:

- Low level care: Accommodation for residents who require some assistance with daily activities;
- High-level care for frail or physically dependent residents requiring a higher level of nursing care; and
- Low and high level dementia care for residents with dementia and other cognitive impairments requiring specialised care in a secure and caring environment.

In addition to the expansion of the residential care facility use, consent is also sought for serviced self-care units. The units are described as '*serviced self-care housing*' by clause 13 (3) of the HSDP SEPP (which defines such accommodation as self-contained dwellings where meals, cleaning services, personal care and nursing care are available on the site).

The serviced self-care units will provide apartment type accommodation for more independent residents in a supported aged care environment.

An important function of the proposed serviced self care units is to enable more able bodied residents to live on the site close to their partners or relatives who may be in higher levels of senior care at the Sir Moses Montefiore Jewish Home. Allowing partners and residents to live close to one another in differing levels of care further promotes the State Government Policy of "ageing in place".

### 3.6 Operations

Staff shift times will remain the same and are as follows:

- Day shift for nurses and other care staff - 6.30am to 2.30pm seven days per week;
- Evening shift for nurses and other care staff - 2.30pm to 10.30pm seven days per week;
- Night shift for nurses and other care staff - 10.30pm to 6.30am seven days per week; and
- Administration - 9.00am to 5.30pm Mondays to Fridays.

A transition of staff takes place between shifts, particularly between the day and evening shifts. This generally takes place over a 1-hour period and ensures the proper handover of tasks and responsibilities from staff members on an outgoing shift to those on an incoming shift. As transition periods require the presence of staff from two shifts at a time (outgoing and incoming), they result in the “peak” number of staff present on the site at any one time.

The number of staff members employed by the Sir Moses Montefiore Jewish Home as a result of the Concept Plan will increase by 89 to 289. The number of staff members on-site at any one time will increase by 53 to 188 (including the one hour shift transition periods). The numbers of voluntary workers on the site is not anticipated to change with up to 10 volunteer staff on-site at any time.

### 3.7 Retail Space / Public Square

The public square to be provided at the King Street frontage will include paved areas, seating and other street furniture, planter boxes and planted trees (refer to **Figure 17**). The proposed retail space adjacent to, and accessible from, the public square on King Street will not exceed 350m<sup>2</sup> of GFA. It is noted that this accords with Council’s planning policy, as articulated in Clause 42 and Schedule 2 of RLEP 1998, that retail floor space on the site is to be no more than 350m<sup>2</sup>.

It is anticipated that the proposed retail unit will accommodate a kosher delicatessen/cafe. An outdoor seating area to be used in association with the kosher delicatessen will be located in the public square. The kosher delicatessen will support the operation of the Sir Moses Montefiore Jewish Home by providing appropriate grocery products for residents and cafe/restaurant style meals and refreshments for residents, visitors and passing members of the public.

Street furniture in the form of masonry blocks which will provide seating as well as masonry “dining tables” to be integrated with planter boxes will be aligned east west through the square. The strip of street furniture will be reinforced as a distinct element through patterns in paving.

The function of the public square and its relationship with the public domain is discussed further in the Landscape Design Statement included as part of **Appendix N**.



**Figure 17** – The proposed public square  
Source: Jackson Teece

### 3.8 Childcare Facilities

The existing childcare centre on the site will be replaced by a new centre located on the first floor of proposed Envelope F as part of Stage 3. The new childcare centre will have capacity for 50 children. This is an increase of 30 children above the capacity of the existing childcare centre, which can accommodate up to 20 children. The proposed childcare centre will be operated independently from the Home, as it is under the current arrangement.

Car parking will be provided for the childcare centre in a hardstand area within the front setback of Envelope F from King Street. An additional vehicle crossing from King Street will be constructed so that a one way loop road from the street to the short stay parking and the entrance to the centre can be provided. Parking for the Childcare centre will also be provided in an undercroft parking area at ground level of Envelope F.

### 3.9 Relationship with Existing Development

The Concept Plan will enable future development of accommodation and support services that are largely based on the existing model of development and care on the site. The layout and form of proposed facilities reflects those of existing facilities.

Referring to architectural plans at **Appendix D**, proposed Building D and proposed Envelope E are to connect with existing Building C. Building C will comprise car parking, services, the proposed electricity cogeneration plant and health/wellbeing facilities at the basement/ground level (shown as Level 2 on the plans at **Appendix D**).

On level 3 of Building C will be aged day care facilities with an existing retail unit fronting the future public plaza on King Street. Levels 4 to 6 will accommodate residential aged care accommodation.

Car parking areas on the basement/first floor level of proposed Building D and proposed Envelope E will connect with the existing parking area under existing Building C.

Levels 3, to 6 of proposed Envelope E and proposed Building D will comprise residential aged care units and facilities. Units and facilities on levels 4 and 5 will connect with dining areas in existing Building C. Residential aged care facilities on level 6 of Envelope E and Building D will connect with similar aged care facilities in the additional level to be added to existing Building C.

Proposed day care facilities in Building E will connect with existing day care facilities in Building C. The connection of existing and proposed aged care developments allows for easy access to shared facilities.

## 3.10 Built Form Character

### 3.10.1 Building Height

While proposed Building D and proposed Envelopes E and F are between four and six storeys in height, the topography of the site, which slopes down from King and Dangar Streets, generally allows the provision of greater building heights at the centre of the site, while concurrently reducing apparent building heights at the King Street and Dangar Street frontages. This will minimise the apparent height of the proposed envelopes when they are viewed from surrounding streets. Building heights will present as a maximum of five storeys to King Street and four storeys to Dangar Street. Building heights, their relationship with the King and Dangar Street streetscapes, and effects on the amenity of surrounding residents are discussed in Sections 5.4 to 5.6.

### 3.10.2 Setbacks and Building Separation

Referring to the Setback Plan at **Appendix C**, the proposed Building D and proposed envelopes observe the following minimum setbacks:

- 10m from the eastern boundary (resulting in a separation from dwellings to the east of Dangar Street of approximately 33m);
- 19.5m (Building D) and 10m (proposed Envelope E) from the south boundary (providing a separation of approximately 35m to 40m from dwellings to the south of King Street); and
- 8.5m from the west boundary, resulting in a separation of approximately 14m to 19m from the adjacent residential flat development at 90 – 98 King Street.

The manner in which these setbacks ensure that the proposal is consistent with the King and Dangar Street streetscapes and minimise adverse amenity impacts is discussed in Section 5.7.

The compatibility of the proposal with its environs is also discussed in this section with reference to the Department of Planning's earlier acceptance of the scheme in the granting of a Site Compatibility Certificate for the now withdrawn Stage 1 DA for the site.

## 3.11 Landscaping and Public Domain

Referring to the Landscape Plans and the Landscape Design Statement at **Appendices E and N**, proposed landscaping across the site and within internal courtyards will comprise 14,739m<sup>2</sup> (50% of site area). Of this total landscaped area, 2,958m<sup>2</sup> (20%) will comprise deep soil planting.

Proposed Building D and proposed Envelope E are to be constructed around internal landscaped courtyards.

The courtyards will be accessible from within the building and will provide secure passive recreation space for residents. The courtyard in proposed Envelope E will be accessible both to residents and users of the day care centre.

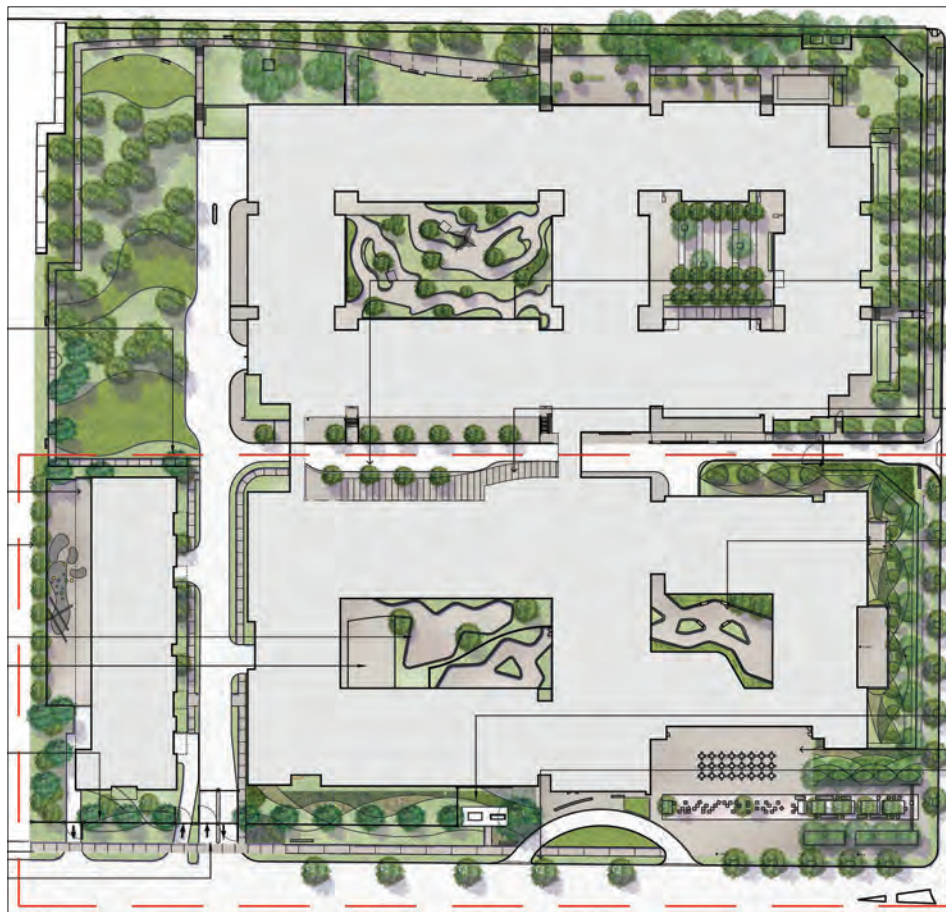
Outdoor terraces on levels 4, 5 and 6 of proposed Building D will provide recreation space associated with the adjacent dementia care accommodation. Accessible walkways and ramps will provide access throughout the proposed landscaped communal open space areas (refer to **Appendices E and N** and **Figure 18**). Landscaping including trees will be provided in the eastern and southern setbacks from Dangar and King Streets to form a landscaped buffer.

Planting will also be located within the western setback to the boundary with the residential flat development at 90-98 King Street. Provision has been made for an outdoor play area within the childcare centre.

Landscaping along the King Street boundary may include some small lawn areas with seating. Street trees to be planted in the King Street road reserve will continue the alignment of existing trees in King Street. The public square to be provided at the King Street frontage will include paved areas, seating and other street furniture, planter boxes and planted trees (refer to **Figures 18 and 19**). The square will accommodate an outdoor seating area associated with the proposed retail unit (anticipated to be used as a kosher deli). Details of planted areas and species are included at **Appendix N**.

### Lighting

Proposed lighting at the perimeter of the site will be of a type typically found in any other residential development. It will be specified and controlled to minimise light spill that might otherwise impact on residential amenity.



**Figure 18** – Existing and proposed landscaping on the site  
Source: Oculus





**Figure 19** – Photomontage of the proposed public square on King Street  
Source: Jackson Teece

## 3.12 Access and Parking

### 3.12.1 Vehicular Access

Halcrow MWT has prepared a Transport and Assessment of the Concept Plan and Project Application (**Appendix O**). The assessment describes existing traffic and parking conditions on the site and in the surrounding area and assesses the likely impacts of both the Concept Plan and Project Application developments. The assessment notes that the existing vehicle access arrangements to the residential aged care facility at Dangar Street and King Street will remain unchanged, with the existing vehicle crossings retained.

The vehicle accessway from King Street and Dangar Street will provide access to lower level car park within proposed Envelope E and Building D. As discussed in Section 3.12.1, an additional vehicle crossing from King Street will be constructed so that a one way loop road from the street to the short stay parking and the entrance to the centre can be provided. This will allow children to be dropped off at the centre safely and conveniently. The temporary car park provided as part of the Project Application development will also be accessible from the King Street vehicle crossing.

### Security

The vehicle accessway from King Street will continue to be security controlled for in-bound vehicles. The location of the existing security gate and associated intercom / card swipe device allows vehicles to stand outside of the security area, but within the site (as opposed to standing on the street). Vehicle access via the Dangar Street entrance will also be security controlled.

### 3.12.2 Loading and Servicing

#### Stage 1 Project Application

Stage 1 of the existing loading dock and service area located in Building A will continue to be the main service area for the site.

It will accommodate day-to-day servicing, such as refuse collection, for the proposed aged care facility expansion. Waste and recycling will be trolleyed to the Building A loading dock and service area from the proposed expansion. The proposed service tunnel connecting existing Building A with Buildings D and E will allow the efficient transportation of goods between the main kitchen and laundry in Building A to the facilities proposed by this Concept Plan.

#### The Completed Concept Plan

Stage 2 will include the construction of a new loading dock and waste/recycling room in the car park within Envelope E. This new loading dock will provide service access. This loading dock has been designed to accommodate a 10.5m long rigid truck, which is the largest vehicle that will visit the site for delivery and servicing purposes.

### 3.12.3 Pedestrian Access

The proposed expansion of the residential aged care facility will not be directly accessible from either King or Dangar Streets. Access to Buildings D and E and the additional floor to existing Building C will be via the existing entrances to, and internal circulation routes within, the building. Existing main entrances are located within the southern extent of existing Building C at the King Street frontage and in the eastern facade of Building C, accessible from Dangar Street. The retail unit and self care accommodation will be accessible directly from the public square located on King Street.

### 3.12.4 Parking

#### Concept Plan

The Concept Plan proposes 57 new car parking spaces, which will bring the total number of spaces on the site to 212. Parking will be located accordingly:

- Lower/basement level car parking within proposed Building D and proposed Envelope E;
- The reconfiguration of basement car parking in existing Building C;
- Hardstand parking in the front setback of proposed Envelope F from King Street. This will accommodate 13 short stay parking spaces for vehicles of visitors dropping off or collecting children from the centre; and
- Undercroft parking at ground floor level on proposed Envelope F.

#### Project Application

The Project Application for Stage 1 of the development proposes an additional 20 spaces on the site, to bring the total to 175. These spaces will be located in:

- The reconfigured basement car park of Building C; and
- The basement of Building D.

**Table 3** shows the distribution of spaces across the site under the Concept Plan and Project Application.

**Table 3** – On-site car parking provision proposed by the Concept Plan

Location	Level	Number of Spaces	Allocation
Buildings A & B	Lower level/ basement	108	
Building C	Lower level/ basement	6	Spaces for staff, visitors and the few residents that drive
Building D (Project Application)	Lower level/ basement	33	Spaces for staff, visitors and the few residents that drive TBC
Envelope E	Lower level/ basement	30	Allocations for staff, visitors and the few residents that drive TBC
Envelope F	Ground level undercroft	22	Self care accommodation
Within the setback of proposed Envelope F from King Street	Ground level hardstand	13	Short stay childcare centre visitor parking
Total Onsite			212

### 3.12.5 Interim Parking Arrangements

The proposed car parking described above represents the permanent parking solution for the site. However, 30 of the additional 57 car spaces to be provided on the site will be located in the lower level/basement area of proposed Envelope E. A proportion of the spaces proposed in Envelope E will be required to meet demand resulting from the use of Stage 1 of the proposal (which includes the construction of Building D).

However, the construction of proposed Envelope E, including lower / basement level parking is not part of the Stage 1 of the Concept Plan (refer to **Sections 3.3** and **3.3**). Temporary spaces will therefore be provided to meet additional demand generated by the use of Stage 1 of the proposal.

These spaces will be located in a temporary car park which will accommodate 18 vehicles, located within the footprint of proposed Envelope E. The temporary car park will be accessible from King Street and constructed as part of Stage 1. It will be used until the construction of proposed Envelope E proceeds.

### 3.12.6 Childcare Centre Access and Parking Arrangements

#### Permanent Childcare Parking Arrangements

The access and parking arrangements for the childcare centre are the permanent solution to existing parking and access issues. At present, there are 8 spaces provided in a car park in the setback of the existing childcare centre from King Street.

The existing spaces frequently prove insufficient for the demand of the childcare centre, resulting in visitors wishing to drop children off at the centre frequently parking their vehicles in on-street spaces, or even double parking. This creates a situation in which children have to exit vehicles parked in the street before making their way to the childcare centre, potentially crossing King Street to do so.



### 3.13 Water Cycle Management

A Stormwater Drainage Concept Plan has been prepared by Emerson Associates to guide future development on the site. As discussed in the plan, a detention basin is proposed to the west of the site that shall be integrated into the on-site landscaping. All discharge from the proposed detention system will be by gravity flow.

A Council-owned pipeline through the site will be moved as part of the development, when the existing childcare facility is removed. An existing detention tank will be relocated to the car park of proposed Envelope E. In addition, a new rainwater retention tank will be provided to collect runoff from the proposed buildings for use in irrigation, toilet flushing and other non-potable water uses. As discussed in Section 5.13, the proposed stormwater system has been designed in accordance with Council requirements for storage capacity and downstream flow rates.

### 3.14 Services and Water and Energy Efficiency

Utilities and infrastructure servicing the existing development on the site are available on-site for connection and/or augmentation as required. The water utilities statement by DP Consulting at **Appendix P** confirms that the site can be serviced with potable water. The electricity utilities statement by Medland Metropolis at **Appendix P** is based on correspondence with Energy Australia and concludes that the proposal including the resultant increase in energy demand, can be serviced with electricity.

A Sustainability Strategy has been prepared by McLahlan Lister to promote environmentally sustainable development on the site (**Appendix Q**).

The strategy aims to reduce the amount of carbon released into the atmosphere by 40% compared with the rate of release of the existing building. A reduction of 30% in the amount of carbon released into the atmosphere through the provision of potable water is also targeted.

These targets are to be achieved through a range of measures including lighting controls and efficient LED lighting, review of domestic appliances and their energy demands, efficient hot water systems, use of recycled rainwater and a cogeneration system to generate electricity from waste heat from gas water systems. These measures are discussed in more detail in Section 15.

### 3.15 Demolition / Site Preparation

Demolition works required for future development in accordance with the Concept Plan will predominantly comprise the demolition of the existing childcare centre, internal road ways, pedestrian footpaths and hardstand areas. The removal of existing landscaping features and planted trees will also be required. Demolition works required for the Concept Plan, other than those involved in undertaking Stage 1 of the plan, will be the subject of further Project/Development Applications for future development on the site, following Concept Plan approval.

A Contamination Review prepared by Cetec is included at Appendix R and describes areas of the site that have been contaminated by previous uses and the investigation and remediation works previously undertaken. The Cetec report also sets out the requirements for further investigation and remediation works and timeframes for the completion of such works. These requirements are discussed in Section 5.16.

Demolition works required for the construction of Stage 1 of the Concept Plan, approval for which is sought as part of this application include:

- The demolition of the hardstand car parking area within the building footprint of proposed Building D;
- Removal of internal roadways and pedestrian access to existing development on the site within and around the footprint of proposed Building D;
- Removal of the eastern facade of existing Building C. This will be done progressively during the construction of proposed Building D;
- Demolition of internal structures within existing Building C in the reconfiguration of existing uses in the building; and
- Removal of the roof and supporting structures of existing Building C to enable the provision of an additional level of the building.

The above demolition works for the Project Application will be undertaken in accordance with the Preliminary Construction Environmental Management Plan (Preliminary CEMP) at **Appendix S**. The Preliminary CEMP includes measures to ensure proposed demolition will not result in any adverse environmental impacts, including those that may otherwise result from dust, construction traffic, noise levels and vibration. The Preliminary CEMP will ensure that waste is minimised and disposed of appropriately and that the reuse and recycling of construction materials is maximised both on and off-site as far as practicable.

A detailed CEMP will be provided subsequent to the approval of the Project Application. The detailed CEMP will include appropriate Erosion and Sediment Control measures.

## 4.0 Director General's Environmental Assessment Requirements

On 21 April 2010, in accordance with Section 75F of the EP&A Act, the Director-General of the Department of Planning issued the requirements for the preparation of an Environmental Assessment to accompany a Concept Plan for the project. A copy of the DGRs is included in **Appendix L**.

**Table 4** provides a detailed summary of the individual matters listed in the DGRs and identifies where each of these requirements has been addressed in this report and the accompanying technical studies.

**Table 4** – Director General's Requirements (Concept and Stage 1 Works)

Requirement	Location in Environmental Assessment	
General		
Executive Summary	Page ii	
Statement of Validity	Page i	
Quantity Surveyor's Certificate	Appendix K	
Site Analysis	Section 2.0	
Description of the Proposed Development	Section 3.0	
Assessment of the Key Issues	Section 5.0	
Draft Statement of Commitments	Section 6.0	
Conclusion and Justification	Section 7.0	
Key Issues	Report	Technical Study
Relevant EPIs, Policies and Guidelines		
Planning provisions of the following EPIs, Policies and Guidelines applying to the site, including those relating to permissibility, are to be addressed: <ul style="list-style-type: none"><li>- NSW State Plan 2010;</li><li>- Metropolitan Transport Plan 2010;</li><li>- Draft East Subregional Strategy;</li><li>- Objects of the EP&amp;A Act;</li><li>- State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (HSDP SEPP);</li><li>- Senior Living Policy Urban Design Guideline for Infill Development;</li><li>- State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004 (BASIX SEPP);</li><li>- State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP);</li><li>- State Environmental Planning Policy No 1 – Development Standards (SEPP 1);</li><li>- State Environmental Planning Policy No 55 – Remediation of Land (SEPP 55);</li><li>- State Environmental Planning Policy No 65 – Design Quality of Residential Flat Development (SEPP 65);</li><li>- Randwick Local Environmental Plan 1998; (RLEP 1998);</li><li>- Development Control Plan 18 – Corner of King and Dangar Streets, Randwick (DCP 18);</li></ul>	Section 5.1	

Requirement	Location in Environmental Assessment	
Relevant EPIs, Policies and Guidelines		
<ul style="list-style-type: none"><li>- Development Control Plan Parking 1998 (Parking DCP);</li><li>- Randwick Childcare Centre Policy 2006 (Childcare Policy);</li><li>- Randwick City Section 94A Development Contributions Plan 2007 (Randwick s94A Plan);</li><li>- Any other relevant DCPs; and</li><li>- The previously approved and now lapsed masterplan for the site.</li></ul>	Section 5.1	
Built Form and Urban Design Impacts		
<p>The EA shall address the height, bulk and scale of the proposed development within the context of the locality and the adjacent North Randwick Heritage Conservation Area and nearby heritage items. Detailed height/contextual studies should be undertaken to ensure the proposal integrates with the surrounding environment.</p> <p>The EA shall also include:</p> <ul style="list-style-type: none"><li>- A comparable height study to demonstrate how proposed height relates to the height to the existing/approved developments surrounding the site;</li><li>- A view analysis to and from the site; and</li><li>- Options for the siting of proposed envelopes.</li></ul> <p>The EA shall address the design quality with specific consideration of the facade, massing, setbacks, articulation, use of appropriate colours, materials and finishes, landscaping, safety by design and public domain including an assessment against Crime Prevention Through Environmental Design (CPTED) principles.</p>	<p>Section 5.4 (Built form response)</p> <p>Sections 5.5 and 5.6 (Effects of heights and bulk)</p> <p>Section 5.8 (Visual impact and views)</p> <p>Section 5.11 (Heritage)</p> <p><b>Table 5</b> (CPTED) and Section 5.10 (security)</p>	<p>Comparable Height Study included a in the Architectural Plans at <b>Appendix C</b></p>
Public Domain / Open Space		
<p>The EA must outline the function, landscape character, access rights and legibility of the proposed plaza. The type, function and character of various open spaces on the site must also be addressed. Pedestrian linkages between such open spaces must be indicated.</p>	<p>Section 3.11</p> <p>Section 5.9</p>	<p>Landscape Plans at <b>Appendix E</b></p> <p>Architectural Plans at <b>Appendix C</b></p>
Environmental and Residential Amenity		
<p>Solar access, acoustic amenity, visual privacy and potential view loss are to be considered.</p>	<p>Section 5.7</p> <p>Section 5.8</p> <p>Table 5</p>	<p>Architectural Plans at <b>Appendix C</b></p> <p>Shadow Diagrams <b>Appendix F</b></p>
Car Parking, Transport and Accessibility (Construction and Operation)		
<p>The EA must demonstrate the provision of sufficient on-site car parking for the proposal. Note: The Department of Planning supports reduced car parking provision in areas well-served by public transport. The EA shall include:</p> <ul style="list-style-type: none"><li>- A Traffic and Accessibility Impact Study prepared in accordance with the Roads and Traffic Authority (RTA) Guide to Traffic Generating Developments;</li></ul>		

Requirement	Location in Environmental Assessment	
Car Parking, Transport and Accessibility (Construction and Operation)		
<ul style="list-style-type: none"><li>- An assessment of the implications of the proposed development on non-car travel modes (including public transport, walking and cycling), the potential for the implementation of a sustainable travel plan for staff and visitors and the provision of facilities to promote non-car travel; and</li><li>- Measures to mitigate potential impacts to pedestrians and cyclists and the operation of the Randwick Bus Depot during the construction stage of the proposed development.</li></ul>	Section 3.12 Section 5.12	Traffic and Parking Assessment at Appendix O
Ecologically Sustainable Development (ESD)		
The EA will demonstrate how ESD principles will be implemented in the development and that it has been assessed against a suitably accredited ratings scheme.	Section 5.17	Sustainability Strategy at Appendix Q BCA Section J Report at Appendix T
Contributions		
The provisions of public benefits, services and infrastructure, having regard to relevant Section 94 Contributions Plans or Planning Agreements must be addressed.	Table 5	
Drainage / Stormwater		
The EA shall address drainage, groundwater and flooding issues including those relating to stormwater, drainage infrastructure and Water Sensitive Urban Design (WSUD) principles.	Section 3.13 Section 5.13	Stormwater Management Strategy at Appendix U
Contamination and Geological Issues		
Contamination, geological and salinity issues will be identified and address. It will be demonstrated that the proposal accords with SEPP 55 and other relevant guidelines and legislation.	Section 5.16	Contamination Review and Site Audit Statements Appendix R Salinity Assessment Appendix W
Utilities		
The adequacy of the capacity of utilities and the staging of infrastructure works should be addressed, in consultation with relevant agencies.	Section 3.14	Utilities Statement Appendix P
Staging		
A detailed staging plan shall be provided, demonstrating how existing services shall be provided during the redevelopment, if required. Relocation strategies for services and the manner in which the operations of the Aged Care Facility will be affected by construction works must be included.	Section 3.3	Staging Diagram included in the Architectural Plans at Appendix C
Housing Choice		
The EA shall provide an assessment of housing choice and identify the mix of 1, 2 and 3 or more bedroom units and the degree of choice of housing stock on-site.	Section 5.1	
Resident Facilities		
The EA is to provide details of resident facilities which would provide the opportunity for residents to socialise with one another and with visitors.	Section 3.2 Section 3.3 Section 3.7 Section 3.7	

Requirement	Location in Environmental Assessment	
Statement of Commitments		
A draft Statement of Commitments must be included detailing measures for environmental management, mitigation measures and monitoring of the project.	Section 6.0	
Consultation		
An appropriate and justified level of consultation is to be undertaken in accordance with the Department of Planning's Major Project Community Consultation Guidelines October 2007.	Section 5.18	
Requirements Specific to Stage 1 of the Concept Plan		
<p>The following is required in relation to Stage 1 of the Concept Plan:</p> <ul style="list-style-type: none"><li>- Details of the relocation of existing uses and associated parking, servicing and delivery areas;</li><li>- Landscape Plans detailing any trees to be removed, existing and proposed planting, retaining walls, detention basins and paving. The plans shall detail the treatment of proposed temporary at grade parking in the footprint of proposed Envelope E and the proposed public plaza, including lighting and street furniture;</li><li>- A schedule of materials and finishes and a sample board;</li><li>- A stormwater Drainage Plan prepared in accordance with Council's requirements; and</li><li>- A Construction Management Plan that includes measures to mitigate potential impacts for pedestrians and cyclists and the Randwick Bus Depot during construction.</li></ul>		<ul style="list-style-type: none"><li>- Architectural Plans – Project Application at <b>Appendix D</b> (parking, services, delivery areas, existing uses)</li><li>- Landscape Plans at <b>Appendix E</b></li><li>- Schedule of Colours and Materials at <b>Appendix H</b></li><li>- Stormwater Management Strategy at <b>Appendix U</b></li><li>- Preliminary Construction Management Plan at <b>Appendix S</b></li></ul>
Other Deliverables		
<p>In addition to the above requirements, the EA must be accompanied by:</p> <ul style="list-style-type: none"><li>- A site Survey;</li><li>- A site Analysis Plan;</li><li>- A Location/Context Plan;</li><li>- Architectural Drawings;</li><li>- A physical Model;</li><li>- Shadow Diagrams;</li><li>- Landscape Concept Plan;</li><li>- Stormwater Drainage Concept Plan;</li><li>- Geotechnical Report; and</li><li>- A Quantity Surveyor's Certificate of Cost to verify the capital investment value of the proposed development.</li></ul>		<ul style="list-style-type: none"><li>- Location Plan at <b>Appendix A</b></li><li>- Site Survey at <b>Appendix B</b></li><li>- Architectural Plans <b>Appendices C and D</b></li><li>- Landscape Plans at <b>Appendix E</b></li><li>- Shadow Diagrams at <b>Appendix F</b></li><li>- Stormwater Management Strategy at <b>Appendix N</b></li><li>- Geotechnical Assessment at <b>Appendix V</b></li><li>- Quantity Surveyors Report at <b>Appendix J</b></li><li>- Physical model to be lodged under separate cover</li></ul>



## 5.0 Environmental Assessment

This section of the report assesses and responds to the environmental impacts of the Concept Plan and Project Application proposals. It addresses the matters for consideration set out in the DGRs. The draft Statement of Commitments at Section 6.0 complements the findings of this section.

### 5.1 Consistency with Relevant Strategic and Statutory Plans and Policies

The DGRs generally require the following legislation, strategies and planning instruments to be addressed:

- NSW State Plan 2010;
- Metropolitan Transport Plan 2010;
- Sydney Metropolitan Strategy;
- Draft East Subregional Strategy;
- Objects of the EP&A Act;
- State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (HSDP SEPP);
- Senior Living Policy Urban Design Guideline for Infill Development 2004;
- State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004 (BASIX SEPP);
- State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP);
- State Environmental Planning Policy No 55 - Remediation of Land (SEPP 55);
- State Environmental Planning Policy No 65 - Design Quality of Residential Flat Development (SEPP 65) and accompanying Residential Flat Design Code (RFDC);
- Randwick Local Environmental Plan 1998 (RLEP 1998);
- Randwick Development Control Plan – Multi Unit Housing 2000 (MUHDCP)
- Randwick Development Control Plan 18 - Corner of King and Dangar Streets, Randwick (DCP 18);
- Randwick Development Control Plan Parking 1998 (Parking DCP);
- Randwick Childcare Centre Policy 2006 (Childcare Policy);
- Randwick City Section 94A Development Contributions Plan 2007 (Randwick s94A Plan); and
- The previously approved and now lapsed masterplan for the site.

### 5.1.1 Strategic Plans and Policies

The relevant provisions of the above strategies and policies listed above are summarised under the headings below.

#### NSW State Plan 2010

The NSW State Plan sets amongst other things Priorities and Targets for 'Improving Housing Affordability'. To this end, the Plan seeks to provide capacity for 640,000 new homes in the Sydney Metropolitan Area, including 445,000 in existing urban areas. The proposed development will provide housing for an additional 276 people, thereby increasing the supply of housing in the metropolitan area generally, thereby indirectly promoting affordability.

The proposal is also consistent with the Plan's objective of '*Planning for an ageing population*' through the increased provision of quality care and support. State Plan objectives of an '*Increase in the number of jobs closer to home*' and '*Growing centres as functional and attractive places to live, work and visit*' will also be served through the location of an employment generating use in an existing residential area, close to public transport, medical, social and community services at the Prince of Wales Hospital and Randwick Town Centre.

#### Metropolitan Transport Plan 2010

The proposed development will serve the objectives of the Metropolitan Transport Plan 2010 by locating both residential and employment generating uses close to public transport and within an existing and established residential area. This will promote the use of public (bus) transport by residents and staff in travelling to and from the site and is thereby consistent with the objective of better integrating land use planning and transport infrastructure. By encouraging the use of local bus services, the development will support the viability of such services.

#### Sydney Metropolitan Strategy

The Sydney Metropolitan Region plans for Sydney's growth to 2031 and anticipates the need for 640,000 new homes over a 25-30 year period. In order to do this, the Strategy sets targets for the provision of new housing that Councils are obliged to meet.

The Strategy anticipates trends in population growth and demographic change and acknowledges that Sydney's population is ageing and that a significant number of aged people will require more (specialised) housing and that early planning is critical. The strategy sets an objective of seeking to house more people within existing areas and allowing people to "age in place" to avoid dislocation of aged people from their existing geographic community and family ties. A review of the strategy is underway through the release of a discussion paper, *Sydney Towards 2036*. It is expected that the Strategy will remain the same and be reinforced by more contemporary data.

#### Draft East Subregional Strategy

The Department of Planning's draft East Subregional Strategy implements the Metropolitan strategy at a subregional level. The East subregion comprises Randwick, Waverley, Woollahra and Botany Bay Councils. While exhibited between 20 July and 24 September 2007, the Strategy is yet to be formally adopted and remains in draft form.

Two of the key directions within the East Subregional Strategy are to 'improve housing choice' to accommodate housing targets and to provide for diversity in housing types commensurate with the diversity of the Subregion's population and to allow 'communities to "age in place"'. The housing target for the subregion is an additional 20,000 dwellings to a total of 142,000 dwellings by 2031.

The draft Subregional Strategy also notes the significant need within the area to provide different housing forms to promote 'aging in place'. Some 18% of the subregion's population will be greater than 65 years of age by 2031, so additional housing or residential places will be required to cater for this increasing and specialised demand.

The draft Strategy states that an appropriate location for increased seniors housing is close to both Randwick shopping centre and the nearby medical facilities hub at the Prince of Wales Hospital.

The Department of Planning's *NSW Statistical Local Area Population Projections* released in April 2010 forecasts population trends to 2036. The projections anticipate that the proportion of people aged 65 and over within the east subregion's population will increase to 19% by 2036 from 9% in 2006.

By comparison, the proportion of people 65 and above in the Sydney metropolitan area by 2036 is projected to be lower, at about 17%.

The Department of Planning projections anticipate an increase in the proportion of those aged 75 and over in the East subregion, rising from 4.3% in 2006 to 10.5% in 2036.

The proposal therefore serves to meet demand for increased diversity in housing types and in particular for accommodation suitable for seniors and the objective of allowing people to age in place, as identified by the Department of Planning's strategic planning.

Given the site's suitability for the proposal and, as there are limited alternative sites within the same ring around Randwick shops and the medical hub that would accommodate the type of development proposed, the proposal is required in order to achieve key Government strategic outcomes.

## 5.1.2 Legislation and Planning Instruments

### Environmental Planning and Assessment Act 1979 (EP&A Act)

Section 5 of the EP&A Act sets out the Objects of the Act. These are as follows:

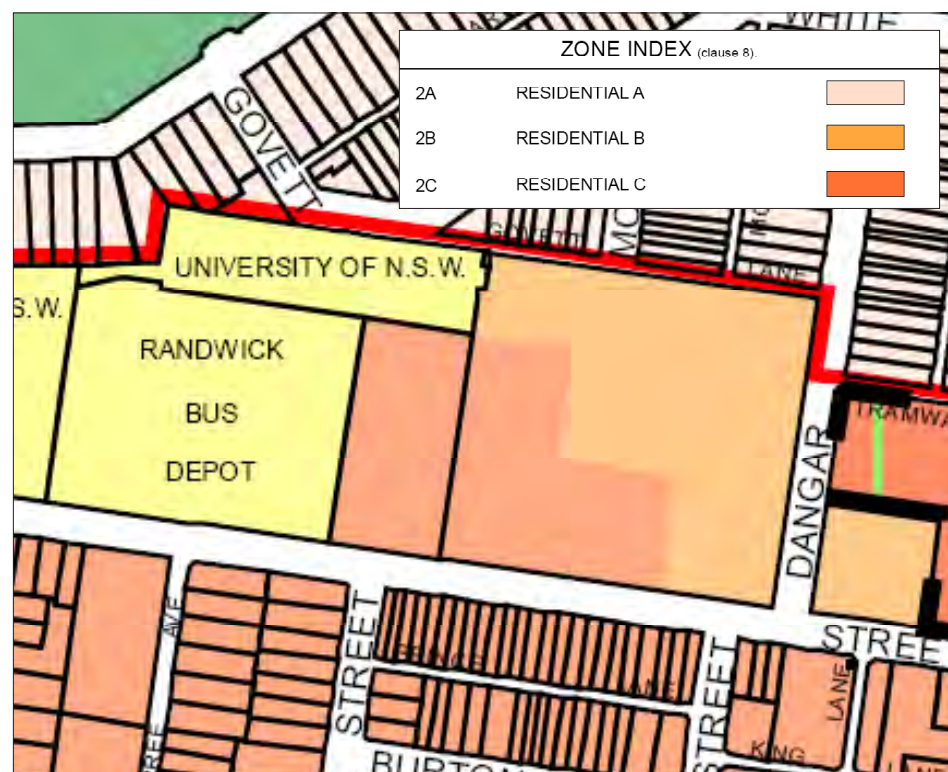
- *To encourage:*
  - *The proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment;*
  - *The promotion and co-ordination of the orderly and economic use and development of land;*
  - *The protection, provision and co-ordination of communication and utility services;*
  - *The provision of land for public purposes;*
  - *The provision and co-ordination of community services and facilities;*
  - *The protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats;*
  - *Ecologically sustainable development;*
  - *The provision and maintenance of affordable housing; and*
- *To promote the sharing of the responsibility for environmental planning between the different levels of government in the State, and*
- *To provide increased opportunity for public involvement and participation in environmental planning and assessment.*

The Concept Plan and Project Application address the objects of the Act as:

- They will result in the expanded use of a presently partly underutilised site, thereby promoting the economic and orderly utilisation of land;
- Referring to the Sustainability Assessment at **Appendix Q**, the proposal will implement strategies to ensure that construction and operational stages of development will minimise consumption of non-renewable resources and the emission of greenhouse gases;
- Land will be provided for public purposes in the form of a publically accessible park at the intersection of Dangar and King Streets, with amenity afforded by landscaping and tree planting and access to cafe/retail uses; and
- The provision of affordable housing will be promoted through a general increase in the supply of housing to the community.
- The proposal will provide for a diversity of housing types and meet some of the anticipated increase in demand for specialised seniors housing and care in future.

### Environmental Planning Instruments

Environmental planning instruments other than SEPPs do not apply to the project, pursuant to section 75R (3) of the EP&A Act. However, consistency with the environmental planning instruments listed in Section 5.1 above is addressed throughout this section (in accordance with the DGRs). The relevant provisions of environmental planning instruments and the manner in which the proposal responds to them are described in **Table 5**. An extract from the zoning map for RLEP 1998 is provided in **Figure 20** in order to assist in an interpretation of the discussion contained in this section of zoning and permissibility provisions of the LEP.



**Figure 20** – Extract from RLEP 1998 zoning map including the site

The DGRs call for consideration of the provisions of SEPP 65, SEPP BASIX, and *Senior Living Policy Urban Design Guideline for Infill Development 2004*. However, as discussed below these policies and guidelines do not strictly apply to the particular development proposed.

## SEPP 65

In accordance with clause 4 and the definitions in clause 3 of SEPP 65, the policy applies to *'residential flat buildings'* that include *'self contained dwellings'*. While the SEPP does not contain a definition for *'dwellings'*, the Standard Instrument - Principal Local Environmental Plan defines *'dwelling'* as *'a room or suite of rooms occupied or used or so constructed or adapted as to be capable of being occupied or used as a separate domicile'*.

While self-contained units will ultimately be constructed within proposed Envelope F, floor layouts for these units are not yet designed and will be more appropriately included in future Project or Development Applications for the site, at which point, full consideration of the relevant provisions of SEPP 65 can occur. Aged care accommodation units for which floor plans are included in this application are limited to the dementia care units in Building D.

The nature of each of the dementia care units is that of a single room accommodating a person who is reliant on specialist care services provided in that room. It is intended that meals are to be taken outside of dementia care units whenever practicable. This arrangement cannot be considered to constitute a *'separate domicile'*.

Further, the HSDP SEPP draws a distinction between the *'residential care facility'* accommodation proposed and *'self-contained dwellings'*. Clause 13 of the policy describes *'self-contained dwellings'* as including private facilities for significant cooking, sleeping and washing, but where clothes washing facilities or other facilities may be provided on a shared basis. This description applies to the proposed self-care accommodation units proposed to be constructed in Envelope F. The self-contained dwellings proposed in Envelope F can appropriately be considered to be *'separate domiciles'* for the purpose of the Standard Instrument.

However, clause 11 of the HSDP SEPP describes *'residential aged care facilities'* as accommodation that includes meals, cleaning services and personal care and/or nursing care, as well as appropriate staffing, furnishings and equipment for the provision of accommodation and care. This description is appropriate for the aged care accommodation proposed in Envelopes D, E and existing building C. Therefore, the appropriate description for the accommodation in Envelopes D, E and existing building C contained in the HSDP SEPP makes it distinct from accommodation that could be considered as *'separate domiciles'*.

Considering the matters discussed above, SEPP 65 does not apply to the Concept Plan (with the exception of future dwellings in Envelope F). However, the SEPP along with the accompanying RFDC are referred to as a guide for the assessment of the proposal's effects on the amenity of surrounding residential developments.

## BASIX SEPP

As discussed in Section 5.17, the benchmarks of the BASIX Scheme are not sufficiently applicable to the particular nature of the accommodation to be provided in proposed Building D, Existing Building C and proposed Envelope E. BASIX certification will be submitted with future Project or Development Applications for self-contained dwellings in Envelope F. Performance data for the existing residential aged care facility on the site has been adopted as a more accurate means by which to assess the proposal.

## Senior Living Policy Urban Design Guideline for Infill Development 2004

It is acknowledged that the DGRs request that this EAR considers the Senior Living Policy Urban Design Guideline for Infill Development 2004. However, the legislative requirement to consider these guidelines is set by clause 31 of the HSDP SEPP. Clause 31 of the SEPP requires that a consent authority considers the Guidelines in assessing applications for in-fill self care housing.



In accordance with Clause 13 of the HSDP SEPP, '*in-fill self-care housing*' consists self-contained dwellings where meals, cleaning services, personal care and nursing care are not provided. As some or all of these services will be provided for all the accommodation proposed, the Guidelines do not apply to the Concept Plan or Project Application.

**Table 5 – Summary of relevant environmental planning instruments**

Issue	Relevant Instrument / Clause	Proposal / Response	Complies
Application of HSDP SEPP	<p>HSDP SEPP</p> <p><b>Clause 4 Land to which Policy Applies</b></p> <p>The SEPP applies to land zoned primarily for urban purposes on which dwelling-houses, residential flat buildings, hospitals and development in respect of special uses is permissible.</p>	<p>The site is zoned part 2B (Residential B zone) and part 2C (Residential C zone) under RLEP 1998. Multi-unit housing is permissible with consent in both of the two zones. In the absence of 'residential flat buildings' as a defined and permitted use in the LEP, the definition of 'multi-unit housing' serves the same purpose. Considering the zoning and the residential uses permitted on the land, the SEPP applies to the proposed residential aged care facility on the site.</p>	Yes
Application of HSDP SEPP	<p>HSDP SEPP</p> <p><b>Clause 8 Key Concepts / 'Seniors'</b></p> <p>'Seniors' are:</p> <ul style="list-style-type: none"> <li>- People aged 55 and over;</li> <li>- Residents receiving residential care within the meaning of the Commonwealth Aged Care Act 1997; and</li> <li>- Aged people eligible for social housing.</li> </ul>	<p>The proposed development is appropriately defined as being designed to accommodate 'seniors'</p>	Yes
Application of HSDP SEPP	<p>HSDP SEPP</p> <p><b>Clause 10 key Concepts / 'Seniors Housing'</b></p> <p>'Seniors housing' is defined as consisting of a residential care facility, hostel, group of self-contained dwellings, or a combination of these.</p>	<p>The Concept Plan proposes a '<i>residential care facility</i>' combined with floor area in Envelope F to be used for '<i>self contained-dwellings</i>'.</p> <p>Accommodation in the Project Application for Stage 1 of the development comprises units in a '<i>residential care facility</i>'.</p>	Yes
Definition of Type of Care Provided	<p>HSDP SEPP</p> <p><b>Clause 11 Residential Care Facilities</b></p> <p>A 'residential care facility' is accommodation that includes meals, cleaning services and personal care and / or nursing care, as well as appropriate staffing, furnishings and equipment for the provision of accommodation and care.</p>	<p>The proposed development will provide accommodation that includes meals, cleaning services, personal care and nursing care with appropriate staffing, furnishings and equipment.</p>	Yes
Restrictions on use	<p>HSDP SEPP</p> <p><b>Clause 18 Restrictions on occupation</b></p> <p>The proposal must accommodate seniors/ people with a disability / employees of the facility.</p>	<p>The development will provide residential care exclusively for seniors.</p>	Yes
Definition of Type of Care Provided	<p>HSDP SEPP</p> <p><b>Clause 13 Self-Contained Dwellings</b></p> <p>'Serviced self-care housing' includes provision of meals, cleaning services, personal care and nursing care are available on the site.</p>	<p>'<i>Serviced self-care housing</i>' will be provided in the form of the <i>self contained-dwellings</i> in Envelope F, subject to further Project/ Development Applications. Meals, cleaning services, personal care and nursing care will be provided.</p>	Yes



Issue	Relevant Instrument / Clause	Proposal / Response	Complies
Zoning / Permissibility	<p>RLEP 1998</p> <p>Clause 8 of zones</p> <ul style="list-style-type: none"> <li>- The site is zoned part 2B (Residential B zone) and part 2C (Residential C zone)</li> <li>- (Refer to Figure 20)</li> </ul>		Noted
Permissibility	<p>HSDP SEPP</p> <p>Clause 15 What this Chapter does</p> <p>The clause allows development for seniors housing on land zoned primarily for urban purposes despite the provisions of any other environmental planning instrument.</p>	The site is zoned for urban purposes, being located partly in the 2B (Residential B zone) and partly in the 2C (Residential C zone). The proposed residential care facility is therefore permissible.	Yes
Permissibility	<p>RLEP 1998</p> <p>Clause 11 Zone 2B (Residential B zone) and</p> <p>Clause 12 Zone 2C (Residential C zone)</p> <ul style="list-style-type: none"> <li>- Multi-unit housing and childcare centres are permissible with consent in both the 2B and 2C zones.</li> <li>- In accordance with clause 42 and schedule 1 of RLEP, retail uses with a GFA of up to 350m<sup>2</sup> are permissible on the site.</li> </ul>	Proposed uses comprise multi unit housing, a childcare centre and a minor and ancillary retail use of 350m <sup>2</sup> GFA.	Yes
Site Suitability	<p>HSDP SEPP</p> <p>Clause 24</p> <p><b>Site compatibility certificates</b></p> <p>A site compatibility certificate is required for any DA that involves an FSR bonus under Clause 45 of the SEPP (see below). A site compatibility certificate must certify that, in the opinion of the Director-General, the subject site is suitable for more intensive development and that seniors housing of the kind proposed is compatible with the surrounding environment having regard to specified criteria.</p>	A site compatibility certificate was granted by the Director General on 14 August 2009, for a previous iteration of the design for the proposal that was subject to the Stage 1 DA lodged with Council in November 2008. The certificate allowed the application of an FSR bonus for a residential aged care facility on the site (subject to development consent) at that time. The certificate is included as Appendix J for reference only as, under part 3A of the EP&A Act, such a certificate is strictly not required (refer to discussion below).	Yes
Site Suitability	<p>HSDP SEPP</p> <p>Clause 25 Application for a Site Compatibility Certificate</p> <p>Provisions for the issue of Site Compatibility Certificates. The Director General must not issue a Site Compatibility Certificate unless he or she is of the opinion that the proposed development is compatible with the surrounding land uses having regard to the location and access requirements of clause 26.</p>	<p>As a Site Compatibility Certificate has previously been issued for an earlier iteration of the design for the proposal.</p> <p>Whilst a site compatibility certificate is strictly not required under Part 3A of the EP&amp;A Act, the issue of such a certificate satisfies clause 25 of the HSDP SEPP and provides guidance as to the Department's view on the suitability of the site for a residential aged care development.</p>	Yes
Proximity to Services	<p>HSDP SEPP</p> <p>Clause 26</p> <p><b>Location and access to facilities</b></p> <p>Consent to a DA for seniors housing must not be granted unless the consent authority is satisfied that residents will have access to retail and community services, recreation facilities, public transport and general medical practitioners.</p>	As a Site Compatibility Certificate has been issued, in accordance with clause 25(5)(b) of the SEPP, Clause 26 is satisfied (refer to discussion above).	Yes

Issue	Relevant Instrument / Clause	Proposal / Response	Complies
Floor space bonus	<p>HSDP SEPP</p> <p>Clause 45 Vertical villages</p> <p>A floor space bonus of 0.5 may be added to the GFA of a seniors living development on land on which residential flat buildings are permitted.</p> <p>On-site support services must be delivered for residents. At least 10% of dwellings will be "affordable places".</p> <p>The definition in clause 45(12) of 'affordable dwellings' includes dwellings provided for 'very low income households' (whose gross income is below 50% of the median household income) who do not spend more than 30% of their household income on rent.</p>	<p>As stated above, a site compatibility certificate has previously been issued allowing an FSR bonus for an earlier iteration of the design for the proposal (subject to development consent). The certificate is included at Appendix J.</p> <p>Residents unable to pay the full cost of their accommodation are subsidised. Currently, the 12% of residents who are on a 'very low income' have their rent waived. The proportion of 'very low income' residents is maintained at a minimum of 10%. The existing operation therefore meets the requirement of a minimum of 10% of residents not paying more than 30% of their income on rent. This proportion of subsidised residents will be maintained in the new accommodation proposed.</p>	Yes
FSR	<p>RLEP 1998</p> <p>Clause 20F FSR</p> <p>Max FSR Zone 2B: 0.65:1</p> <p>FSR bonus Zone 2B: 0.5:1</p> <p>Max FSR Zone 2B including FSR bonus under HSDP: 1.15:1</p>	<p>GFA in 2B zone: 29,311m<sup>2</sup></p> <p>Site area in 2B zone: 19,146m<sup>2</sup></p> <p>FSR 2B zone: 1.53:1</p> <p>Exceedence: 0.38:1</p>	<p>No</p> <p>Refer to Section 5.5</p>
	<p>Max FSR Zone 2C: 0.9:1</p> <p>Max FSR Zone 2C including FSR bonus under HSDP SEPP: 1.4:1</p>	<p>GFA in 2C zone: 15,236m<sup>2</sup></p> <p>Site area in 2B zone: 10,207m<sup>2</sup></p> <p>FSR 2C zone: 1.49:1</p> <p>Exceedence: 0.09:1</p>	<p>No</p> <p>Refer to Section 5.5</p>
Height	<p>RLEP 1998</p> <p>Clause 20G Building Heights</p> <p>Max building height Zone 2B: 9.5m</p> <p>Max building height Zone 2C: 12m</p>	<p><i>Concept Plan</i></p> <p>Maximum building height in Zone 2B: 20.2m (10.7m above the standard)</p> <p>Maximum building height in Zone 2C: 20.5m (8.5m above the standard)</p> <p><i>Project Application</i></p> <p>Maximum building height in Zone 2B: 16.5m (7m above the standard)</p> <p>Maximum building height in Zone 2C: 10.1m - <b>Compliant</b></p>	<p>No</p> <p>Refer to Section 5.5 and 5.6</p>
Height	<p>RLEP 1998</p> <p>Clause 20G Wall Heights</p> <p>Max external wall height Zone 2B: 7m</p> <p>Max external wall height Zone 2C: 10m</p>	<p><i>Concept Plan</i></p> <p>Given the indicative nature of a Concept Plan, exact wall heights for Envelopes E and cannot be ascertained at this stage. Detailed future building plans showing how these envelopes will be filled will establish wall heights.</p> <p><i>Project Application</i></p> <p>Maximum building height in Zone 2B: 16m (9m above the standard)</p> <p>Maximum building height in Zone 2C: 10.1m - <b>Compliant</b></p>	<p>Refer to Section 5.5 and 5.6</p>

Issue	Relevant Instrument / Clause	Proposal / Response	Complies
Height	The previously approved masterplan for the site  - Dangar Street - roof RL50.5 (2 storeys above street)  - King Street - roof RL53.7 (3 storeys above street)	- Dangar Street – RL58.53 at 4 storeys (8.03m / 2 storeys above the control)  - King Street – RL54.53 to RL58.53 (0.83m to 4.83m / 1 storey above the control).	NA
Development Standards	<b>HSDP SEPP</b> <b>Clause 40 Development standards</b>  Minimum lot size: 1,000m <sup>2</sup>  Minimum site frontage: 20m	Site area: 29,353m <sup>2</sup>  Frontages: 164.5m to 78.5m	Yes
Landscaped Area	<b>RLEP 1998</b> <b>Clause 20E</b> <b>Landscaped area</b>  A minimum of 50% of the site is to comprise landscaped area. No more than 50% of the landscaped area is to be provided over podiums of excavated basements.	- Proposed landscaped area: 14,739m <sup>2</sup> (50% of site area)  - Proposed landscaped area over podiums / basements: 2,958m <sup>2</sup> (20% of total landscaped area)	Yes
Site Specific DCPs	<b>RLEP 1998</b> <b>Clause 40A Site Specific DCPs</b>  Consent must not be granted for a development involving more than 10,000m <sup>2</sup> of land unless a site specific DCP has been prepared.	Under Section 75M(4) of the EP&A Act, if an environmental planning instrument requires the preparation of a DCP before development can take place, the obligation may be satisfied by an application for and approval of a Concept Plan.	Yes
Design Principles	<b>HSDP SEPP</b> <b>Clause 32</b> <b>Design of residential development</b>  Adequate regard to be given to the principles clauses 32 to 39.	See below	Yes
Design Principles	<b>HSDP SEPP</b> <b>Clauses 32 to 39</b>  Principles relate to neighbourhood amenity and streetscape, visual and acoustic privacy, solar access and design for climate, stormwater, crime prevention and waste management.	The satisfaction of these principles is addressed in Sections 5.3 to 5.8, 5.11 and 5.17.	Yes
Streetscape	<b>DCP 18</b> <b>Clause 3.3 Site Frontage</b>  Frontages should be sympathetic to surrounding streetscape	Refer to Sections 5.3 to 5.7 for a detailed discussion.	Yes
Topography	<b>DCP 18</b> <b>Clause 3.5 Topography</b>  Development should take advantage of existing ground levels in order to minimise effects on the streetscape.	The topography of the land, which slopes down from both the north and south, allows for greater building heights at the centre of the site, without resulting on adverse streetscape impacts. The proposal takes advantages of such topography. Refer to Section 5.5 and 5.6.	Yes

Issue	Relevant Instrument / Clause	Proposal / Response	Complies
Detailed development controls	<p>HSDP SEPP</p> <p><b>Clause 41</b> <b>Standards for hostels and self-contained dwellings</b></p> <p>Consent must not be granted for self-contained dwellings unless they comply with the standards in Schedule 3 of the SEPP that relate to detailed design matters.</p>	The standards in Schedule 3 of the SEPP are appropriately addressed at Construction Certificate Stage for the relevant future buildings.	Yes
Design quality	<p>SEPP 65</p> <p><b>Part 4 Application of design quality principles</b></p> <p>The proposal must be accompanied by a design verification statement from a qualified designer certifying that the design principles set out in Part 2 of the SEPP have been achieved.</p>	While the requirement for a design verification statement is not strictly applicable to the future buildings on the site, such a statement has been prepared by Jackson Teece architects is included at Appendix C.	Yes
Design quality	<p>SEPP 65</p> <p><b>Part 2 Design Quality Principles</b></p> <p>The principles relate to context, scale, built form, density, energy and water efficiency, landscaping, amenity, security, social dimensions and ascetics.</p>	Refer to the design verification statement prepared by Jackson Teece architects at Appendix C.	Yes
Separation	<p>RFDC</p> <p><b>Part 01 Building Separation</b></p> <p>Four Storeys / 12m: 12m</p> <p>5 to 8 storeys (to 25m): 18m</p>	All building envelopes proposed by both the Concept and Project Applications comply with the rule with regard to separation from residential buildings surrounding the site.	Yes
Setbacks	<p>RFDC</p> <p><b>Part 01 Setbacks</b></p> <ul style="list-style-type: none"> <li>- Relate side setbacks to existing streetscape patterns;</li> <li>- Test side and rear setback with building separation, open space and deep soil zone requirements; and</li> <li>- Test side and rear setbacks for overshadowing of other parts of the development and/or adjoining properties.</li> </ul>	<p>In relation to both the Concept and Project Applications:</p> <ul style="list-style-type: none"> <li>- Proposed front setbacks are consistent with existing development on and surrounding the site;</li> <li>- Side setbacks accommodate deep soil planting as proposed; and</li> <li>- Referring to Section 5.7 and Shadow Diagrams at <b>Appendix F</b>, the proposal does not result in adverse overshadowing impacts.</li> </ul>	Yes
Setbacks	<p><b>Development Control Plan – Multi Unit Housing 2000</b></p> <p><b>Clause 3.3.4</b></p> <ul style="list-style-type: none"> <li>- Front setback: Consistent with adjoining;</li> <li>- Zone 2B side setback: Average of 4m with a minimum of 2.5m;</li> <li>- Zone 2C side setback: Average of 5m with a minimum of 3.5m; and</li> <li>- Max length of a section of wall with no articulation: 10m min. length of any step in exterior wall: 3m.</li> </ul>	<p>In relation to both the Concept and Project Applications:</p> <ul style="list-style-type: none"> <li>- Proposed front setbacks are consistent with existing development on and surrounding the site;</li> <li>- Minimum side setbacks are 9m; and</li> <li>- Stepping within facades, the installation of ceramic baton shade structures and fenestration will provide facade articulation in accordance with MUHDCP objectives.</li> </ul>	Yes

Issue	Relevant Instrument / Clause	Proposal / Response	Complies
Setbacks	<p>DCP 18</p> <p><b>Clause 3.6 Setbacks</b></p> <p>DCP 18 applies to land within the former King Street bus depot and includes the site.</p> <p>Front setbacks shall be at least 6m to an existing road</p> <p>Car parking in the front setback is to be avoided and vehicle crossings minimised</p>	<p>Minimum setback from street edge: 10m</p> <p>While parking is provided within the setback of Envelope F from King Street, proposed planting will provide visual screening that will mitigate the visual impact of the parking area when viewed from the street.</p> <p>Car parking is proposed in the front setback of Envelope F to provide a safe area in which to drop off children at the future childcare centre. The proposal therefore appropriately balances visual amenity with the need to adequately provide for safety.</p>	Yes
Solar Amenity	<p>MUHDCP</p> <p><b>Clause 4.4.4 Solar Access</b></p> <ul style="list-style-type: none"> <li>- Solar access to solar collectors on adjacent buildings between 9am and 3pm all year;</li> <li>- Living areas of neighbouring dwellings do not have sunlight reduced to less than 3 hours per day all year;</li> <li>- 50%+ of principal landscaped areas of adjacent dwellings not to have sunlight reduced to less than 3 hours per day all year; and</li> <li>- Living areas orientated to the north.</li> </ul>	<p>Referring to the Shadow Diagrams at <b>Appendix F</b>, the proposal complies as:</p> <ul style="list-style-type: none"> <li>- There will be no impacts from either the Concept Plan or Project Application to potential solar collectors on roofs of surrounding buildings;</li> <li>- Building F (stage 3 of the Concept Plan) will overshadow living area windows and balconies of 2 apartments and the balconies of a further two apartments at 90-98 King Street in the morning for less than half an hour before 9.30am in midwinter (June 21). Otherwise, both the Concept Plan and Project Application developments will result in no reduction in sunlight access to living areas or principle landscaped areas of any adjacent properties.</li> </ul>	Yes
Views	<p>MUHDCP</p> <p><b>Clause 3.3 View Sharing</b></p> <p>Development should minimise the obstruction of views from adjoining buildings and public places.</p>	Refer to Section 5.7	Yes
Privacy	<p>MUHDCP</p> <p><b>Clause 4.2.4 Privacy</b></p> <ul style="list-style-type: none"> <li>- Windows and balconies of main living areas are to be located to avoid overlooking of similar windows in adjoining dwellings and areas of private open space.</li> <li>- Where there is a horizontal separation of less than 10m between windows, they should offset, angled or screened to reduce privacy impacts.</li> </ul>	<p>Habitable areas proposed by both the Concept Plan and the Project Application are separated by approximately:</p> <ul style="list-style-type: none"> <li>- 33m from residential buildings on the eastern side of Dangar Street;</li> <li>- 35m from residential buildings to the south of King Street; and</li> <li>- 14m from the residential flat building at 90-98 King Street to the east.</li> </ul> <p>This separation will ensure there are no visual privacy impacts to adjoining dwellings.</p>	Yes
Public Open Space	<p>MUHDCP</p> <p><b>Clauses 3.7 and 3.8</b></p> <ul style="list-style-type: none"> <li>- Public Open Space</li> <li>- Large, conveniently located and useable areas of open space are to be provided. Concept plans are to indicate plantings and pavement treatments.</li> </ul>	Refer to Section 5.9 and Landscape Plans at Appendix E	Yes

Issue	Relevant Instrument / Clause	Proposal / Response	Complies
Traffic	DCP 18 <b>Clause 3.10 Traffic Management</b> Vehicular access from King Street is preferred for the western portion of the site and access from Dangar Street preferred for the eastern portion.	Proposal is in accordance with Clause 3.10.	Yes
Heritage Significance	RLEP 1998 <b>Clause 43</b> Heritage Conservation The consent authority may require a heritage impact statement to assess impacts of a proposal on heritage significance of a heritage item or conservation area.	Refer to the Heritage Impact Assessment by Clive Lucas Stapleton and Partners (Appendix M).	Yes
Energy Efficiency	BASIX SEPP The SEPP aims to reduce energy and water consumption by certain kinds of residential developments. It requires commitments to energy and water efficiency measures.	Ad discussed in Section 5.17, the BASIX scheme is not an appropriate means by which to assess the energy and water efficiency of the proposed residential aged care facility.	NA
Contamination	SEPP 55 <b>Clause 7</b> <b>Contamination and remediation</b> Council may not grant consent unless it has considered whether the land is contaminated. If it is contaminated, it must be suitable for the proposed development in its contaminated state, or will be suitable after remediation.	Refer to Section 5.16	Yes
Traffic Generating Development	Infrastructure SEPP <b>Clause 104 / Schedule 3</b> Developments for any purpose with access to any road and parking for 200 cars or more must be referred to the Roads and Traffic Authority (RTA). This applies to extensions to existing developments.	The Concept Plan will result in the provision of 212 car spaces on the site and must therefore be referred to the RTA.	Noted
Car Parking	Car Parking DCP <b><i>Parking required for the Project Application</i></b> - DCP requirement for visitor spaces: 1 visitor space per 10 bed x 357 beds for Stage 1 = 36 spaces - DCP requirement for 1 space per 2 staff members x 163 staff = 82 spaces - Total Project Application requirement: 118 spaces	<b><i>Project Application</i></b> Spaces proposed: 175	Yes
Car Parking	Car Parking DCP <b><i>Parking required for the Project Application</i></b> - DCP requirement for visitor spaces: 1 visitor space per 10 bed x 522 beds proposed for Concept Plan = 53 spaces - DCP requirement for 1 space per 2 staff members x 202 staff = 101 spaces		



Issue	Relevant Instrument / Clause	Proposal / Response	Complies
Car Parking	<ul style="list-style-type: none"> <li>- DCP requirement for 0.5 spaces per bedroom in self contained dwellings x 35 units = 18 spaces</li> <li>- Childcare Centre: DCP requirement for 1 space per every 2 staff members. As the number of staff cannot be known at this stage, a rate of 1 space per 4 children is adopted, in accordance with RTA guidelines: 50 children onsite = 13 spaces</li> </ul> <p><i>Total Concept Plan requirement: 187 spaces</i></p>	<p><b>Concept Plan</b></p> <p>Spaces proposed: 212</p>	Yes
Access	<p><b>MUHDCP</b></p> <p><b>Clause 5.2</b></p> <p><b>Driveways</b></p> <p>Minimum width of 3m, located at least 1m from any side or rear boundary.</p>	The minimum width of the ingress and egress driveways providing access to the child care centre, proposed as part of Stage 3 of the Concept Plan, is approximately 3m.	Yes
Security	<p><b>MUHDCP</b></p> <p><b>Clause 4.5 safety and security</b></p> <p>Residential environment should promote a feeling of security and freedom from threat of assault or burglary.</p>	By providing living overlooking King and Dangar Streets and active uses in the public square and retail units, the proposal will promote casual surveillance of the public domain and improve security. Controlled access and security arrangements combined with lighting will ensure the proposal will perform adequately in terms of security.	Yes
Randwick Childcare Policy	<p><b>Childcare Centres DCP</b></p> <p>The DCP sets out the requirements of the Department of Community Services (DoCS), the BCA and Council as well as locational, operational and built form requirements.</p>	<p>The relevant requirements of the Department of Community Services (DoCS), the BCA and Council will be addressed in Project / Development Application(s) for a childcare centre in Envelope F, following Concept Plan approval.</p> <p>The site is a suitable location for a Childcare Centre, in accordance with Clause 7 of the DCP as it is located close to Randwick town centre, hospitals and public transport and in a detached building with dedicated parking. Vehicles will be able to be driven into and out of the site in a forward direction</p>	Yes
Servicing	<p><b>HSDP SEPP</b></p> <p><b>Clause 28 Water and Sewer</b></p> <p>Consent must not be granted unless the consent authority is satisfied that the proposal will be serviced with water and sewer.</p>	Referring to the water and sewer utilities statement by DP Consulting Group at Appendix P, the proposal is capable of being serviced with water and sewer utilities.	Yes
Required Documentation	<p><b>Clause 30</b></p> <p><b>Site analysis</b></p> <p>An adequate site analysis is required.</p>	An appropriate site analysis is provide in tis EA.	Yes
Randwick s94A Plan	<p>The plan authorises Council to levy development contributions in accordance with Section 94A of the EP&amp;AA Act.</p> <p>In accordance with Clause 11.3.3, seniors housing developments are exempt from levies charged under the plan.</p>		NA

## 5.2 Site Suitability

The site's suitability for the proposed development is demonstrated by the proposal's consistency with State Government Planning Strategies, including those for 'ageing in place' and its ability to meet future demand for seniors housing on a site identified as appropriate by the Draft East Subregional Strategy. The site presently operates as an aged care facility and the extension of this use is proposed in order to meet present and anticipated future demand for such services and accommodation.

As demonstrated in Sections 5.3 to 5.7 below, the proposal provides an adequate response to built form context and adequately considers surrounding residential amenity, in accordance with MUHDCP and RFDC controls and rules of thumb. Accordingly, inconsistencies with height and FSR standards contained in RLEP 1998 are acceptable, when considered on their merits and on balance.

As demonstrated throughout this section, the site can accommodate the proposed development without also resulting in adverse impacts in terms of stormwater runoff, traffic, heritage significance, contamination, visual amenity and views. The proposal incorporates sufficient parking to accommodate anticipated demand and the technical means to reduce energy and water consumption compared with the base case of more conventional designs.

The site also suitable for the proposed development as it is located close to community services and medical facilities in Randwick Town Centre and the Prince of Wales Hospital as well as local public transport links. These services and links will support the proposed operations on the site and promote the use of public transport in travelling to and from work and places of residence.

The site's suitability for the proposal is further supported by the earlier granting of a Site Compatibility Certificate by the Department of Planning under the HSDP SEPP for a previous iteration of the proposal lodged as a stage 1 DA with Council.

## 5.3 Comparison with Previous Masterplan

A comparison of the Concept Plan with the 2001 and 2002 masterplans assists in understanding the fulfilment by the proposal of Council's planning objectives for the site. However, in drawing such a comparison, it must be borne in mind that the masterplans represent Council's intentions for the site at the time at which they were approved. These objectives, in part, reflect the spatial and service requirements of both the Montefiore Jewish Home aged care facilities as they were almost a decade ago.

While objectives for the provision of aged care and trends towards increasing demand for such care have remained constant since 2001/02, the manner in which aged care is delivered has evolved. This evolution necessitates new spatial requirements and, in the case of the Montefiore Home, an increase in the intensity of development on the site in order to provide a caring environment which will not only benefit its residents, but also the community generally, as detailed below.

### The Reduction of the Masterplan Site

The 2001 masterplan included 90-98 King Street (Lot 201 DP 879576) adjacent to the current Sir Moses Montefiore which was then available for redevelopment and is now occupied by the Centennial apartment building. It was subsequently decided to exclude 90-98 King Street from the masterplan area. Consequently, the 2002 masterplan was prepared solely for the current Sir Moses Montefiore site that is the subject of this Concept Plan (ie Lot 202 DP 879576).

Given the reduced size of the area to be developed, the second masterplan development was smaller in terms of aged accommodation and other facilities provided, as demonstrated in the comparison of the two masterplans and the Concept Plan in **Table 6**.

**Table 6** – A numerical comparison with the 2001 and 2002 Masterplans

2001 Masterplan	2002 Masterplan	Current Concept Plan
480 beds	277 beds	276 beds
100 self-care units	60 self-care units	35 self-care units
1,200m <sup>2</sup> aged daycare centre	825m <sup>2</sup> aged daycare centre	TBC
340 seat synagogue	244 seat synagogue	-
350m <sup>2</sup> of retail space	350m <sup>2</sup> of retail space	350m <sup>2</sup> of retail space
FSR: 1.08:1	FSR: 1.2:1	FSR: 1.52:1
Dangar Street max building height: RL51.8 (to pitch roof ridge)	Dangar Street max building height: RL50.5 (to pitch roof ridge)	Dangar Street max building height: RL58.53 (skillion roof)
King Street building max height: RL54.8 (to pitch roof ridge)	King Street max building height: RL53.7 (to pitch roof ridge)	King Street max building height: RL58.53 (skillion roof)

As shown in **Table 6**, the increase in FSR of the 2002 masterplans over the 2001 scheme was minor (0.12:1). The maximum building heights at Dangar and King Streets were consistent between the two schemes, with the 2002 masterplan being slightly lower in this respect than the previous approved scheme.

It is considered that the reduction in the capacity of aged care development planned for the site in the 2002 masterplan compared with the 2001 scheme resulted from the reduced size of the site. As noted in a Council Officer's Report of 5 July 2002, the 2002 masterplan layout was generally similar to the 2001 layout, with the buildings that were to occupy the adjacent land at 90-98 King Street deleted from the scheme. The Council Officer's Report of 5 July 2002 can be made available if required.

Given the similarity in bulk, height and layout between the two masterplans, it is considered that the reduced provision of aged care facilities in the 2002 masterplan was a result in a reduction in developable land rather than a reduction in demand for aged care accommodation. In effect, the 2002 masterplan represented the approved 2001 masterplan development, with the built form that was to be located on the adjacent lot removed due to the lack of availability of that lot for development.

### Increased Spatial Requirements of Aged Care

Along with continually increasing demand for aged care, the objectives for the delivery of that care have also generally remained constant. The objectives of the 2001 masterplan, as articulated in the Architectural Plans prepared by Flower and Samios Architects, are consistent with those for the approved Stage 1 DA for the site and this Concept Plan. These objectives include those for meeting the changing care needs of its resident population as it ages, ageing in place, taking advantage of the concentration and centralisation of aged care services and facilities and the provision of "higher order" facilities.

The constant of rising demand for aged care places (particularly close to established social networks) and the objectives behind aged care provision have been accompanied by advancements in standards of care, the manner in which it is delivered and the expectations of the residents of aged care accommodation. These developments in the aged care accommodation have come to require greater amounts of floor space in order that appropriate care can be provided to fulfil the common objectives of the Concept Plan and previously approved masterplans.

The greater floor space requirements of contemporary aged care accommodation are reflected in the data in **Table 6**, which shows that the Concept Plan does not propose a greater quantum of accommodation on the site (in terms of numbers of beds). The proposed slight increase in FSR (of 0.32:1) above that of the lapsed 2002 masterplan and the greater building heights proposed by the Concept Plan are necessary in order to fulfil demand for aged care and provide the increased floor space required for modern models of care provision.

The increased FSR and heights also account for anticipated future needs of Sir Moses Montefiore Jewish Home, on the basis of likely changes and trends in demographics and care needs that were not foreseen at the time of the previous masterplans.

### Appropriateness of the Proposal in its Contemporary Aged Care Context

In light of advancements in aged care provision and the resultant floor space requirements, a direct comparison between the built form that is necessitated on the site today and that necessitated when the previous masterplans were prepared is of limited relevance.

The proposed development is appropriate to the site in the context of contemporary models of care and their spatial requirements as they have evolved since 2002. This is confirmed by the Site Compatibility Certificate issued for the then Stage 1 DA by the Director General of the Department of Planning in August 2009 which certifies that, at the time it was issued, the site was suitable for the proposed intensity of development. In this context, and as the proposed development is consistent with desired future character and will not result in adverse amenity or visual impacts, as discussed in **Sections 5.4 to 5.8** below, the height, bulk and scale of the proposed envelopes fulfil the same objectives as the previously approved masterplans as those objectives apply to the contemporary and anticipated future aged care environment.

### Built Form Required in Provision of Public Benefits

Proposed bulk and height, which, as discussed above, are necessitated by evolved models of care, are required in order that the expanded Sir Moses Montefiore Jewish Home can provide appropriate aged care in a location that allows for ageing in place. By supporting ageing in place and by enabling improved economic use of land and cost efficiencies through the concentration of aged care facilities on a single site, rather than in a more fragmented manner, proposed bulk and scale will deliver benefits to the broader community as well as residents.

## 5.4 Built Form

The Concept Plan and Project Application proposals appropriately respond to the varied built form surrounding the site, including single storey dwelling houses to the south, townhouse developments to the east and the taller residential and institutional buildings to the west. Proposed height, bulk and scale will provide an appropriate transition from the character of the institutional precinct to the west of the site to the medium density housing developments to the east.

As both the existing and proposed buildings on the site are residential and in part institutional in nature, the Concept Plan and Project Application will not result in any significant change to the character of the Montefiore site in terms of the mix of uses.

The stepping of building height across King Street from residential properties to the south up to the roof of the upper level of proposed Envelope E, the consistency in the heights of proposed Building D and residential buildings to the east of Dangar Street and the consistency of the proposed front setback with those of surrounding properties all serve in meeting design objectives for consistency with desired future character.

The proposal takes advantage of topography, which slopes down from the north and south to form a basin at the centre of the site, which is lower levels than the surrounding land. This topography allows for greater bulk and height at the centre of the site, while minimising apparent height and bulk at respective street frontages.

The development will be consistent with the desired future character of the surrounding residential area, as articulated in Council's planning controls, when the flexibility to local controls allowed by the HSDP SEPP and the permissible floor space bonus is taken into consideration. The consistency of the proposed front setback with those of surrounding properties further ensures consistency with desired future character.

Consistency with desired future character is further supported by its general compliance with MUHDCP and RFDC controls for setbacks, building separation, solar access, privacy and landscaping (refer to **Table 5**).

## 5.5 Building Heights, Wall Heights and FSR Proposed by the Concept Plan

### 5.5.1 Consistency with Planning Controls

While environmental planning instruments other than SEPPs do not strictly apply to the project, pursuant to section 75R (3) of the EP&A Act, the proposal's consistency with the objectives/stated purpose of Council's standards for building height and FSR for the site are discussed in this section. A comparison of the Concept Plan with these standards, as summarised in **Tables 6** and **7** below.

It is noted that wall heights for Envelopes E and F proposed by the Concept Plan cannot be ascertained at this stage, as detailed building designs are provided. The proposal for Building D under the Project Application is addressed in Section 5.5.2.

**Table 7** – Building heights proposed by the Concept Plan compared with LEP standards

Zone	Maximum Permissible Building Height	Proposed Building Height Varies Across The Site Up To	Variation
Residential 2B	9.5m	Max. 20.2m	Up to 10.7m
Residential 2C	12m	Max. 20.5m	Up to 8.5m

The LEP does not contain stated objectives for building and wall height standards. However, the stated purpose for the standards is:

*"To operate together with controls for floor space ratio and landscaped area to limit the size, scale and site coverage of a building having regard to the environmental amenity and aesthetic character of the area".*

**Table 8** – FSRs proposed by the Concept Plan compared with LEP standards

Zone	FSR Standard	FSR standard (including 0.5:1 FSR bonus awarded under the HSDP SEPP)	Variation
Residential 2B	0.65:1	1.15:1	0.38:1
Residential 2C	0.9:1	1.4:1	0.9:1

The LEP does not contain stated objectives for FSR standards. However, the stated purpose for the FSR standards is:

*"To operate together with controls for building height and landscaped area to limit the size, scale and site coverage of a building having regard to the environmental amenity and aesthetic character of the area".*



With regard to amenity, as discussed in Section 5.7, the proposal is consistent with MUHDCP and RFDC controls and rules of thumb for setbacks, building separation, solar access, privacy and landscaping. The stated purpose of the LEP's height standards with regard to amenity is therefore satisfied.

The purposes of height and FSR standards in terms of character depend on the interrelationship between height and building bulk. Therefore, the proposal's consistency with the purpose of both height and FSR requires an assessment of the combined effects of height, bulk and scale. Such an assessment is provided in Section 5.5.2 below.

While the previously approved masterplan for the site has lapsed, it is referred to as a guide as it was (until lapsing) Council's position regarding the development of the site. Referring to **Table 5**, The Concept Plan exceeds the lapsed masterplan's height controls in the following manner:

- Dangar Street – RL58.53 at 4 storeys (8.03m / 2 storeys above the previous control); and
- King Street – RL54.53 to RL58.53 at 4 to 5 storeys (0.83m to 4.83m / 2 to 3 storey above the previous control).

Despite the non-compliances with the lapsed masterplan height controls, the proposal is generally consistent with the masterplan in terms of character as:

- Proposed setbacks from Dangar and King Streets are consistent with those in the masterplan;
- The proposed setback of Building D from King Street is greater than that of the masterplan, thereby reducing the prominence of the building in the streetscape and the impact of bulk and scale. Given these reduced impacts, Building D is substantially similar in character as development envisaged by the masterplan; and
- The upper level setback of proposed Envelope E reduces the apparent height of the building, when viewed from the street, thereby achieving consistently with desired future character.

## 5.5.2 Response to Surrounding Character

### Building Height at Street Frontages

The maximum 20.5m building height proposed by the Concept Plan is reached at the north-eastern corner of Proposed Envelope F. These maximum heights are reached at the centre of the site, in an area generally out of view and away from the public domain and surrounding development.

The proposal takes advantage of topography, which allows bulk and height to be concentrated at the centre of the site, while minimising apparent height and bulk at street frontages within excavated basements. The stepping back of the upper levels further minimises apparent bulk and height at street frontages. Consequently, building heights at King Street proposed by the Concept Plan are reduced. These heights range from 9.53m at the eastern end of the frontage (Building D) to 14.53m at the western end (Envelope F) (the range in heights is due to the slope along King Street, which rises from RL41 in the west up to RL45 AHD in the east (refer to the survey plans at **Appendix A**).

Building D is proposed to be 4 storeys in height at King Street. Envelope E will present as 3.5 storeys as a result of level 2 (the lowest level) being partly below ground level and due to the setback of the upper level from the street. Proposed Envelope F will present as 4 storeys to King Street, with its apparent height also being reduced by an upper floor setback. Maximum building heights of proposed Building D at the Dangar Street frontage are generally consistent at 13.5m. The building will also present as 4 storeys to Dangar Street. Maximum building heights proposed by the Concept Plan will not therefore result in impacts to the character of King and Dangar Streets, with heights at frontages minimised by topography and any related excavation.

## Apparent Bulk at Street Frontages

The Concept Plan seeks minor variations to the applicable standards by 0.38:1 and 0.9:1 respectively for the 2B and 2C zones. In response to the site's sloping topography, Level 2 of the proposed Building D envelope is provided at an excavated level. The provision of GFA below street level reduces the building's apparent bulk when viewed from the King Street frontage.

The location of parking spaces below ground at the King Street frontage will reduce the apparent bulk of proposed Envelope E when viewed from King Street. The apparent bulk of Envelope E will be further minimised by the upper level setback from the building line.

## Compatibility with Existing Character

Referring to the Height Diagram at **Appendix C**, the upper level setback of proposed Envelope E allows for a transition of building heights across King Street, with roof levels stepping up from between RL47.1 and RL53.2 AHD at existing properties on the south of the street to RL54.53 at the building line of Envelope E. The built form then steps up again to a roof level of RL58.53 across the site. This gradation of building height allows for an appropriate transition in height and scale across the street from two to three and then to four storeys.

At RL58.53 AHD, the proposed roof level at the Dangar Street frontage is compatible with the level of the roofs of the existing medium density/ townhouse developments to the east of Dangar Street, which range from RL53.43 to RL56.3 AHD.

## Compatibility with Desired Future Character

In *Veloshin V Randwick Council [2007] NSWLEC 428*, Roseth SC established a planning principle for the assessment of height, bulk and scale. In looking at these issues the relevant questions Roseth poses are:

- Are the impacts consistent with impacts that may be reasonably expected under the controls?
- Where the planning controls are aimed at creating a new character, is the proposal consistent with the bulk and character intended by the planning controls?

With regard to the first of the two questions, as discussed in **Table 5**, the Concept Plan development is consistent with MUHDCP controls and RFDC Rules of Thumb that aim to ensure reasonable solar access to, and privacy for, neighbouring dwellings. The minimum requirement for solar access to buildings to the south and west of the site is achieved and reducing proposed building heights would not significantly increase solar access to surrounding properties.

Ample building separation to the north, east and south, combined with differences in floor level, will ensure privacy both within and adjacent to the Montefiore Jewish Home site. Proposed separation from the adjacent residential flat building to the west will, combined with differences in level, also adequately provide for privacy.

In addressing the second question posed by the Planning Principal, consideration must be given to permissible FSRs on the site. The maximum permissible FSR on the site, including the FSR bonus for vertical villages under the HSDP SEPP, is 1.15:1 on the Residential 2B zoned area of the site and 1.4:1 on the 2C zoned land. The Concept Plan seeks variations to the applicable standards by 0.38:1 and 0.9:1 respectively for the 2B and 2C zones.

Given the minimisation of apparent bulk and height at the King and Dangar Street frontages discussed above and as the quanta of the exceedences to FSR standards are minor in their context, it is feasible that buildings of greater apparent bulk could be provided on the site, while still achieving compliance with the relevant amenity and privacy standards. The proposal is therefore not inconsistent with desired future character with regard to apparent building bulk.

The granting of an FSR bonus for a vertical village on the site under the HSDP SEPP makes it implicit that greater building heights than those permitted under RLEP 1998 are envisaged in future development of the land where it is for new or expanded aged care facilities, especially as the SEPP seeks to promote such facilities in urban areas where land or opportunity is scarce.

Further, the existing zoning of and controls for the site coupled with the existing (but partially completed) development seek to continue the transformation of the site and locality from an institutional precinct to a mid to higher density residential neighbourhood. The HSDP SEPP allows for a higher degree of flexibility to the local controls to further promote housing for the aged in appropriate locations, such as the one proposed.

Therefore, when provisions of both the LEP and the SEPP are considered, planning controls do, indeed, allow for a new character on the site. The proposal is not inconsistent with desired future character, being lesser in terms of bulk and height than a development likely to be permissible on the site. The second question posed by Roseth SC is therefore satisfied.

Given the above considerations and the proposal's minimisation of impacts to vistas and streetscapes discussed in Section 5.8, proposed building envelopes are consistent with desired future character in terms of height and building bulk.

The proposal is also consistent with the purposes of standards for building and wall height and FSR in RLEP 1998 insofar as they relate to character.

In summary, the proposal's ultimate appearance is appropriate for its context and it has been demonstrated that the proposed building envelopes are consistent with desired future character. Proposed impacts resulting from building bulk and height are consistent with those reasonably expected under planning controls. The Concept Plan and Project Application are therefore acceptable with regard to bulk, height and scale.

## 5.6 Building and Wall Heights Proposed by the Project Application

Inconsistencies between the Project Application comprising Stage 1 of the proposed development with RLEP 1998 standards for building and wall heights and FSR, are summarised in **Tables 8** and **9** below.

**Table 9** – Heights proposed by the Project Application compared with LEP height standards

Maximum Permissible Building Height – Zone 2B	Proposed Building Height Varies Across The Site Up To	Variation	Maximum Permissible Wall Height – 2B zone	Proposed Wall Height Varies Across The Site Up To	Variation
9.5m	Max 16.5m	Up to 7m	7m	Max 16m (approx)	Up to 9m

**Table 10** – FSRs proposed by the Project Application compared with LEP standards for FSR

Zone	FSR standard (including 0.5:1 bonus)	Variation
Residential 2B	1.15:1	0.38:1

The 16.5m maximum building height proposed exceeds the relevant RLEP 1998 standard by 7m, while the maximum wall height of 16m exceeds the relevant standard by up to 9m. Proposed FSR exceeds the standard for the 2B zone by 0.38:1.

Despite the non-compliances with height standards, the Project Application development is consistent with the stated purpose of the standards for similar reasons to those discussed in Section 5.5 in relation to the Concept Plan, as summarised below.

The maximum 16.5m building height and 16m wall height is reached at the north western corner of proposed Building D at the centre of the site, generally out of view from the public domain and away from street frontages. The proposal takes advantage of topography, which allows bulk and height to be concentrated at the centre of the site, while minimising apparent height and bulk at street frontages within excavated basements. Once the development is complete, apparent height at each of the frontages will be four storeys.

Building heights at the King Street frontage range from 9.53m at the south eastern corner of Building D to 13.8m at the western e eastern end of Building D. Building heights at the Dangar Street frontage are generally 13.5m. Inconsistencies in proposed building height and building height standards are therefore minor.

### Compatibility with Existing Character and Desired Future Character

As discussed in Section 5.5.1, at RL58.53, the proposed roof level at the Dangar Street frontage is compatible with the level of the roofs of the existing medium density/townhouse developments to the east of Dangar Street, which range from RL53.43 to RL56.3 AHD.

The proposal satisfies the Planning Principle established as a result of *Veloshin V Randwick Council* as:

- The Project Application development complies with the MUHDCP and RFDC in relation to solar access to, and privacy for, neighbouring dwellings;
- Considering the maximum permissible FSR on the site, the variations to the FSR standard proposed and the minimisation of apparent bulk and scale at street frontages, it is feasible that buildings of greater apparent bulk could be provided on the site, while still complying with amenity and privacy controls;
- The FSR bonus under the HSDP SEPP makes it implicit that greater building bulk and, consequently height, than those permitted under RLEP 1998 are envisaged on the land. Therefore, planning controls allow for a new character on the site with which the proposal is not inconsistent; and
- The proposal minimises impacts to vistas and streetscapes (refer to Section 5.8).

Given the above considerations, proposed building envelopes are consistent with desired future character and the stated purpose of the RLEP for maximum building height standards. The Project Application is therefore acceptable with regard to bulk, height and scale.

## 5.7 Residential Amenity

### 5.7.1 Solar Access

#### Concept Plan

The Concept Plan does not compromise the amenity of surrounding residential developments. Moreover, it performs well in terms of sunlight amenity, by virtue of the ample separation of 14m to 35m between proposed built form and surrounding residences. This is demonstrated by the proposal's consistency with RFDC 'Rules of Thumb' and the MUHDCP controls for solar access and privacy, as shown in **Table 5**.

Referring to **Table 5** and the Shadow Diagrams prepared by Jackson Teece at **Appendix C**, the proposal will result in the overshadowing of the living area windows and balconies of two apartments and the balconies of a further two apartments at 90 - 98 King Street to the west of the site for less than half an hour between 9.00am and 9.30am in mid winter. It is noted that in the existing situation, between 9.00am and 9.30am, the living area windows and balconies of the apartment building concerned are already partially overshadowed by upper levels of the apartment building itself.

With the exception of the affected balconies and windows at 90 - 98 King Street, the proposal will not overshadow living area windows or principle outdoor areas of any surrounding dwellings.

RFDC Rules of Thumb provide that adjacent buildings up to 4 storeys in height must maintain a minimum separation of 12m between habitable rooms or balconies. For buildings of 5 storeys or more in height, this minimum separation is 18m.

As proposed Envelope F is 6 storeys in height, it must allow for separation of 18m from the adjacent residential building at 90-98 King Street in order to be consistent with the Rule of Thumb. This could have been achieved if buildings both on the site and at 90-98 King Street were setback by 9m from the party boundary. While the proposed building envelope observes the 9m setback, the adjacent building does not, with a side setback of approximately 4m from the party boundary.

In order to compensate for the adjacent property's lack of consistency with RFDC controls, levels 5 and 6 of proposed Envelope F have been setback from the building line. This design solution allows for Envelope F to be separated from the adjacent building by 14m at levels 1 to 4 and 19m at levels 5 and 6 (refer to **Figure 21**).

This will ensure that solar access and privacy of dwellings at 90-98 King Street are adequately protected through the provision of the separation between habitable areas that accords with RFDC controls on a level by level basis. In this respect, the proposal offsets the failure of the adjacent development to achieve consistency with SEPP 65 objectives. In doing so, the proposal will forgo development potential of the site.



**Figure 21** – Extract from Concept Plan showing separation between proposed Envelope F and 90 - 98 King Street to the west  
Source: Jackson Teece



## Project Application

As Envelope F is the sole building envelope that results in overshadowing proposed by the Concept Plan, Stage 1 of the development will result in no overshadowing of living areas, principal areas private open space or roofs that could accommodate solar collectors.

### 5.7.2 Privacy

Both the Concept Plan and Project Application adequately consider the privacy of adjacent developments and is consistent with MUHDCP and RFDC controls for privacy, with minimum building separations of approximately:

- 33m between Building D and dwellings to the east of Dangar Street;
- 35m between Building D and Envelope E and residences on the southern side of King Street; and
- 14m from proposed Envelope F and the adjacent Centennial residential flat building at 90 - 98 King Street to the west of the site.

The privacy provided by the above building separations is reinforced by differences in floor levels between the proposed development and adjacent residences. In relation to Envelope F, the Concept Plan can also implement, where necessary, additional privacy measures including offset windows, landscaping and screening. Considering the matters discussed above, proposed inconsistencies with standards for height and bulk will not result in adverse privacy impacts.

### 5.7.3 Acoustic Privacy

The layout of aged care units in Building D that is the subject of the Project Application is consistent as far as practicable for an aged care facility with the guidelines in the DoP's Residential Flat Design Code (RFDC). Within the parameters allowed by the provision of residential aged care and associated facilities, the proposed development:

- utilises the site and building layout as far as practicable to provide separation between proposed building envelopes and neighbouring buildings;
- locates quieter living areas adjacent to one another; and
- separates noisy spaces from quiet spaces.

Technical solutions to ensure adequate acoustic privacy will be implemented, subject to construction certificate designs. These may include door seals and double glazing.

## External Acoustic Impacts

As the proposed aged care use is residential in nature and consistent with the existing development on the site, it is not anticipated that it will result in adverse noise impacts. Given the demographic and lifestyles of the residents of the Sir Moses Montefiore Jewish Home and the general absence on the site of back yards adjacent to adjoining dwellings and other potential sources of noise, it is anticipated that the development will result in a lesser external acoustic impact than an alternative residential development that could be located on the site. The location of driveways into the aged care home away from surrounding residences will also ameliorate noise impacts.

The proposed childcare centre is also consistent with the existing childcare use on the site, both in terms of its nature and its location. While the proposed deli/cafe will be a new use on the site, its operations and resultant noise generation will be assessed as part of development or project applications for the site. Development or project application assessment processes will ensure that the use of both the deli/cafe and the childcare centre will not result in noise levels that exceed the relevant guidelines and controls for acoustic amenity.

## 5.8 Visual Impact and Views

### 5.8.1 Concept Plan

As the Concept Plan seeks concept approval, with future development of the site subject to subsequent Project / Development Applications, it will not in itself result in any visual impact. The discussion below demonstrates that building envelopes, siting and landscaping proposed in this application adequately allow for future visual amenity and vistas from surrounding properties.

#### Dangar Street

The Height Diagram at **Appendix C** provides an analysis of the roof levels of proposed and existing building envelopes on the site with those of surrounding developments. The Site Setback Plan shows the separation between proposed and surrounding developments.

The discussion below is informed by conclusions about view corridors that are based on consideration of roof levels and building separation. It is also informed by a visual analysis of the streetscape of and existing development in Dangar and King Streets.

Given the relative ground and floor levels of the Dangar Street residences and the site, westward view corridors from these residences above the existing Montefiore Jewish Home buildings predominantly comprise skyline, with no significant views of surrounding localities visible above and beyond the buildings. View corridors above and through existing Montefiore buildings from Dangar Street residences are therefore appropriately considered as affording “vistas” across the site, as opposed to “views”. The proposed building envelopes do not, therefore, reduce access to local views from residences in Dangar Street.

At RL58.53, the roof level of proposed Building D is generally consistent with that of the existing Building C (RL56.25), which is located within the vista across the site from Dangar Street. The pre and post-development vistas along Dangar Street shown in the Existing Development Photograph and the Photomontage of View 4 at **Appendix G** show that proposed Building D is consistent with residential dwellings on the opposite side of Dangar Street in terms of height and character. Given this consistency and the minimum separation of approximately 33m of Building D from residences to the east of Dangar Street, the proposal will not result in adverse impacts to vistas along Dangar Street or vistas from Dangar Street residences.

The provision of landscaping including trees within the setback of Building D from Dangar Street will soften the appearance of the proposed development, thereby further minimising visual impact. This is further reinforced by the “sunken” appearance of the development off Dangar Street.

#### King Street

Similar to Dangar Street, differences in ground and floor levels between residential buildings to the south of King Street and the site preclude the availability of distinct views above the rooflines of existing buildings on the site. Vistas of the Montefiore Jewish Home building and landscaped areas are therefore available from the southern side of King Street, rather than views.

Vistas are visible from King Street residences across the site to the northeast along Dangar Street and to the northwest towards Govett Lane. Vistas of the site from King Street residences will also be affected by the proposed Envelope E and Building D. However, the visual impact of the development will be minimised through street and upper level setbacks from King Street. Landscaping within the King Street setback will soften the appearance of the proposed building envelope, further minimising visual impact.

It is noted that views along King Street of the Chimney that was part of the former tram depot to the west of the site and is a local heritage item will be preserved by the proposal. The function of the chimney as a marker within the urban form that is visible from King Street and surrounding areas will therefore continue.

The Concept Plan and Project Application developments are consistent with the existing character of King Street, which comprises institutional uses to the west (the TAFE, UNSW and State Transit Authority sites) and a low density residential area to the west of Wentworth Street. These areas of institutional and low density residential character are linked by a transitional area which includes the existing Montefiore Jewish Home development and the residential buildings at 90-98 King Street. This transitional area is characterised by higher density buildings, which are all residential in appearance and nature. The proposal will not, therefore, result in significant change to the character of the site and is consistent with surrounding built form character.

The transition of building heights across King Street and reduction in apparent height afforded by the building line and upper level setbacks of Building D and Envelope E (discussed in Section 5.5.2 will) reduce the dominance of development on the site over other buildings in the streetscape.

The pre and post-development vistas along King Street shown in Existing Development Photograph and Photomontage of Views 1, 2 and 3 at **Appendix G** show that the proposal is not inconsistent in height, bulk and scale with the residential character of King Street and does not appear to be dominant over buildings on the opposite side of the street.

The Photographs and Photomontages also demonstrate that the proposed public square replaces existing perimeter planting and fencing that currently encloses private land within the site's southern boundary. The replacement of perimeter planting and fencing with a publically accessible square activated by deli/cafe outdoor seating with tree plantings that soften the appearance of buildings on the site will improve the existing relationship between development on the site and the streetscape.

With the provision of the public square on King Street, the vista along Church Street will terminate in an area of open space. Referring to the Existing Development Photograph and Photomontage of View 5 at **Appendix G**, the proposal will eliminate a vista along Church Street to the existing landscaped areas on the site to existing Building A. However this vista will be replaced with that of an area of public open space with high quality landscaping activated by the deli/cafe seating. It is considered that the public plaza character and landscaping of the square is more in keeping with the residential character of the vista along King Street than the existing vista of private open space on the site. Viewed from Church Street, the height, bulk and scale of proposed Building D are not inconsistent with the built form character of the residential area in which the building located.

### 90-98 King Street – 'The Centennial' Apartment Building

Dwellings in the residential flat buildings at 90-98 King Street immediately to the west of the site currently look onto existing landscaped areas of the Montefiore Jewish Home site. What can be seen from 90-98 King Street cannot be considered to be a "view". However, it is acknowledged that the visibility of the existing landscaped areas contributes towards the amenity of the 90-98 King Street residences. These landscaped areas will generally no longer be visible from apartments at 90-98 King Street, once a building filling Envelope F has been constructed.

In assessing the impact to the amenity of dwellings at 90-98 King Street that will result from Envelope F, the Planning Principle established in *Tenacity Consulting v Warringah Council* (2004) [NSWLEC 140] is worth noting.

In accordance with the principle, taking away a view entirely cannot be considered “view sharing”, but may nonetheless be reasonable in certain circumstances.

In this respect, the reasonableness of proposed Envelope F is considered in light of the following generally established principles:

- There is a distinction between “outlook” and “views”;
- Outlook is a short range prospect and may take in, for example, the space from one building to another. Views are more extensive or long range to particular objects or geographic features;
- The distinction between “outlook” and “views” should be considered within precinct wide planning contexts; and
- Views are not retained as a “right”. There can be no guarantee that views or outlook from existing development will be maintained.

Applying the above principles, it can be concluded that:

- There are no significant views from 90-98 King Street over the existing Montefiore Jewish Home buildings;
- What is seen from apartments at 90-98 King Street looking east consist of the space between the apartment building and existing buildings on the site and constitutes “outlook” as opposed to “views”;
- The potential to preserve the “outlook” from 90-98 King Street should be considered in the context of desired future character and the applicable local and regional planning objectives, as articulated in EPIs and State Government strategies and the landowner’s ability to develop land consistent with the objects of the EP&A Act; and
- Considering the desired future character and strategic planning context of the site and the development, it should not be expected that outlook from 90-98 King Street will be retained.

As the proposal is consistent with local and State Government planning and strategic objectives and with the desired future character of the site, it is reasonable that the outlook from 90-08 King Street be removed by Envelope F in the provision of a residential aged care facility and childcare centre on the site.

The reasonableness of the removal of outlook is further demonstrated by the adequate preservation by the proposal of solar access to and visual privacy of the apartments at 90-98 King Street, in accordance with MUHDCP and RFDC controls.

### Govett Lane

As the proposed building envelopes are located to the south of the site and separated from Govett Lane by the existing Montefiore Aged Care buildings, visual impacts to Govett Lane residences are negligible or minimal. Proposed Envelope F may be visible from the rear of properties on Govett Lane between Govett Street and Mort Street.

However the separation between proposed Envelope F and these residences, combined with the presence of landscaping and trees within that separation will ensure no adverse impacts to vistas from dwellings results from the proposal.

In conclusion, proposed non-compliances in terms of height and bulk do not result in adverse impacts to views, vistas or visual amenity to any adjacent property in the context of the development opportunity available on the site.

## 5.8.2 Project Application

Impacts to views and vistas resulting from the Project Application are limited to the effects discussed in this in relation to Dangar Street and the eastern end of King Street. As Envelope F is not part of the Project Application, the project application does not contribute to the removal of outlook from 90-98 King Street.

## 5.9 Landscaping and Public Domain

Referring to the Landscape Design Report at **Appendix N**, the proposal will contribute positively to the amenity of the site and surrounding public domain areas through the implementation of landscaping principles and strategies including:

- Accessible walkways and ramps will be provided throughout the site allowing opportunities for residents, staff and visitors to walk through landscaped areas safely and securely;
- Soft landscape buffers will be provided at the Dangar Street frontage and will soften and improve the appearance of the building and include paved terraces providing sheltered, sunny outdoor spaces for residents;
- Existing Dangar Street landscape north of the entry will be complemented by continuing the line of large trees south to King Street with dense understorey plants;
- Landscape along the King Street boundary will soften and improve the appearance of the buildings on the site;
- The publically plaza on King Street will allow for the integration of retail/ cafe uses on the site with the public domain, thereby providing amenity for visitors to such uses (refer to **Figure 22**) ;
- The design of the public plaza on King Street provides an appropriate transition from the streets into the plaza, with levels between the existing building C and the plaza are rationalised;
- The proportions of the plaza allow for the retail uses to address the street and for tree planting without reducing solar access;
- The courtyards on Levels 2, 3, 4, 5 and 6 of Blocks D and E will provide secure passive recreation space for elderly and cognitively impaired residents; and
- An outdoor play area with shade structures will form part of the childcare centre and will incorporate play equipment for supervised play.

As stated in **Table 5**, the proposal complies with the RLEP 1998 standard that at least 50% of the site is to be provided as landscaped area and that no more than half of this be provide over podiums or basements. (The proposal includes 50% of the site as landscaped area, with no more than 20% of this provided over basements). Deep soil is retained at street frontages and within larger external landscaped areas on the site to allow for planting of larger vegetation.





**Figure 22** – Outdoor seating area in the public plaza for use by visitors to the future deli/cafe  
Source: Jackson Teece

## Function of the Public Square

Referring to the Landscape Design Report at **Appendix N**, the proposal balances the need to delineate the public square as a distinctive landscaped space, with the allowance of free access between the square and the surrounding public domain.

The absence of fencing or other physical barriers or changes of level between the square and the surrounding pedestrian walkways allows for permeability.

An additional line of street trees will be planted within the square, parallel with the street trees to be planted at the street edge. This will reinforce the appearance of the square as a distinct public domain element and visually frame it within the streetscape, yet will not impede access to the square.

The strip of street furniture, including masonry block seating and “dining tables” integrated with planter boxes through the centre of the square will reinforce the delineation between the square and the pedestrian walkway, while appearing as a permeable entry both to the square and deli/cafe. By providing shade from planted trees, visual amenity and street furniture, the apparent entry to the square will be attractive to passers-by. The attractiveness of the square to pedestrians will also be reinforced by the planter box to the north of the square which will incorporate more formal “garden” type plantings and canopy tree planting.

Through the allowance of permeability and the creation of a space that is attractive to passers-by, the proposal integrates the private use of the deli/cafe with the public domain and creates an area of open space available to the surrounding community and which creates opportunities for social interaction.

## Ownership and Maintenance

While the square will be publically accessible, it will remain under the ownership of Sir Moses Montefiore Jewish Home, which will be responsible for its maintenance. All necessary easements to allow public access as well as any access required by Council or utilities providers will be created following approval of the Concept Plan.

## 5.10 Security

The Concept Plan implements principles of Crime Prevention Through Environmental Design (CPTED) contained in the Department of Planning guideline titled *Crime Prevention and the Assessment of Development Applications* (2001) as follows:

### Surveillance

As noted in *Crime Prevention and the Assessment of Development Applications*, good surveillance means that people can see what others are doing. People feel safe in public areas when they can easily see and interact with others. Would-be offenders are often deterred from committing crime in areas with high levels of surveillance.

In accordance with this principle, the proposed retail unit, which is anticipated to accommodate a cafe/deli will provide a degree of activity in the proposed public square that will allow people to easily casually observe what others are doing. This will encourage a perceived sense of security for people in the square and deter potential offenders.

The presence of the windows of accommodation units overlooking King Street, Dangar Street and the public square will promote the reality and/or perception that the streets and square are under casual surveillance both night and day. A perception of surveillance during both daylight hours and in darkness will be heightened by the continual presence of staff on the site 24 hours a day. Though minimal, the numbers of staff at night will be sufficient to create a perception that people are present on the site and so may observe those intending to commit crime. This will increase the perception of risk in the minds of potential perpetrators.

The presence of the porte cochere at the King Street entrance to the building creates an awareness that the entrance is frequently used by numbers of people large enough to require transportation by coach and so increases the perceived risk of detection.

### Access Control

Access controls use physical and symbolic barriers to attract, channel or restrict the movement of pedestrians. As noted in *Crime Prevention and the Assessment of Development Applications*, effective access control makes clear where people are permitted to go or not go makes it difficult for potential offenders to reach and victimise people and damage property. Illegible boundary markers provide excuses for being in restricted areas.

Proposed landscaping along King Street creates a clear distinction between the pedestrian walkway and the development in that plantings within the setback from the street are of a more formal/ornamental nature that typically belongs within private “garden areas” rather than the public street. Planting in the setback from Dangar Street is of a similarly private character and is located behind a fence that physically delineates privately from public spaces. The presence of the porte cochere and vehicle access at the entrance from King Street reinforce the function of the entrance as a privately controlled “drop off point”.

## Territorial Reinforcement

Territorial reinforcement refers to the clear identification of public spaces and creation of a sense of community ownership over such spaces. As noted in the *Crime Prevention and the Assessment of Development Applications* people feel comfortable in, and are more likely to visit, places which feel owned and cared for. Well used places also reduce opportunities for crime and increase risk to criminals.

The landscape treatment of the proposed public square incorporates differences in paving, planter boxes, street furniture and formally laid out garden area to the north of the square that provide a clear indication of a cared for and maintained space.

## Space Management

Space management refers to providing attractive, well maintained and well used spaces. As noted in *Crime Prevention and the Assessment of Development Applications*, space management strategies include site cleanliness, rapid repair of vandalism and graffiti and the removal of damaged physical elements.

As the function of the square is important to the effective operation and amenity of the Sir Moses Montefiore home and the cafe/deli, the maintenance of the square will be a priority for the management of the site. Appropriate space management of the square will therefore be an essential element of the proposed operations.

## Design Features

In addition to the adherence by the proposal of the above principles, the proposal minimises opportunities for concealment through the general avoidance of corners at street level. Proposed fencing on Dangar Street will be constructed of open steel palings and so cannot conceal a person behind it.

Proposed lighting on King and Dangar Streets will adequately illuminate spaces so as to prevent concealment, while being controlled so as not to result in amenity impacts at night.

Permanent car parking for the aged care facility will be located within the building and shall be security controlled and temporary parking to be provided under the Project Application for Stage 1 of the development will be adequately lit. The car parking for the childcare centre will be located close to the entrance of Building F, in clear view of the adjacent street and will not be generally in use at night.

## 5.11 Heritage Significance

The Heritage Assessment prepared by Clive Lucas Stapleton and Partners Pty Ltd and provided at **Appendix M** considers the relationship of the proposed development on heritage items in proximity to the site, in particular the former Boiler House Chimney Stack associated with the former Tram Depot to the west of the site and the North Randwick Heritage Conservation Area adjacent to the north.

The assessment also considers concerns raised in objections received from members of the community in response to previous development applications for the expansion of the Montefiore Jewish Home.

### Heritage Values of the Site and Surrounding Area

The site was once part of the Randwick Bus Depot (shown in **Figure 3**), which was formerly the Randwick Tram Depot. The Tram Depot dates from circa 1881 and was the largest such depot in New South Wales. The Bus Depot ceased operation around 1985, when the principal buildings of the depot were demolished. The former Boiler House Chimney Stack that has been retained to the west of the site dates back to the operation of the Bus Depot and is listed as a local heritage item in RLEP 1998. Citing previous studies of the former Bus Depot, the assessment notes that the heritage principles for the former bus depot include a principle that the chimney should not be obscured.

## Effects of Development in Accordance with the Stage 1 DA

The Heritage Assessment finds that the proposed development will retain significant views of the chimney stack from King Street. Partial views of the top of the chimney stack from Dangar Street will most likely be obscured from ground level. However, the Dangar Street views are predominantly precinct views and considered “minor”. The report concludes that the loss of the minor views of the chimney stack from Dangar Street will have a minimal impact on heritage significance.

In addition to the findings of the Heritage Assessment, as discussed in Section 5.8.1, views along King Street of the Chimney will be preserved by the proposal. The function of the chimney as a marker within the urban form visible from King Street and surrounding areas will continue.

The proposal involves up to three metres of excavation that will impact the topography of the site as it relates to the former Bus Depot period. However, the topography of the site provides little information to the use of the depot and is of little significance. Any surviving archaeology of the former Bus Depot may be recovered during construction.

The northern part of the Montefiore site is adjacent to the North Randwick Heritage Conservation Area, the southern boundary of which is defined by Govett Lane. The proposed new envelopes and building will be separated from the conservation area by existing Buildings A and B on the site.

As such, the new buildings, being to the south of the site will have a minimal visual impact on the heritage conservation area to the north over Govett Lane. The assessment concludes that the proposal will have a minimal impact on the nearby heritage item and conservation area.

## 5.12 Access and Parking

### 5.12.1 Traffic Volumes

The Traffic and Parking Assessment at **Appendix O** includes data for existing traffic flows into and out of the existing aged care facility during the morning peak period of 8.45am – 9.45am and the evening peak period of 3.45pm to 4.45pm. These movements mainly comprise staff commuting into and out of the site.

The results of a staff travel questionnaire conducted by Halcrow MWT indicates that 21.8% of staff members who drive to work park in surrounding streets and not in onsite car parking areas.

Taking this into account, Halcrow MWT calculated the numbers of vehicle movements in peak hours generated by people travelling to and from the site in the existing situation and following the completion of the Concept Plan development.

This data considers both residential aged care and childcare centre uses, includes drivers who park both on site and in the street and is presented in **Table 10** and includes.

**Table 11** – Existing and proposed vehicle movements to and from the site (includes aged care and childcare centre uses)

Use	AM Peak vehicle movements to and from site - existing	AM Peak vehicle movements to and from site - post development	PM Peak vehicle movements to and from site - existing	PM Peak vehicle movements to and from site - post development
Aged care home	90 (64 in / 26 out)	146 (101 in and 45 out)  This is an increase of 56 movements (37 in and 19 out)	106 (35 in / 71 out)	168 (57 in / 111 out)  This is an increase of 62 movements (22 in and 40 out)

Considering the degree of increase in the volumes of traffic generated by the Concept Plan, the Halcrow MWT assessment concludes that the proposal will not result in adverse impacts on the surrounding road network. The residential aged care use proposed is considered to be a relatively low traffic generator. Traffic generation resulting from the Concept Plan can be accommodated by the surrounding road network.

### 5.12.2 Intersections

The operation of the intersection of King and Dangar Street is currently assessed as providing Level of Service (LoS) A, which is considered to be “good” with average delays in the morning and evening peak periods of 10 seconds. The Dangar and King Street accesses into the site are also assessed as being at LoS A/“good”, with average delays of 8 to 10 seconds.

Considering historical analyses of traffic volumes in the surrounding area that show a decline in volumes in the past, Halcrow MWT calculates anticipated traffic volumes and their effects on surrounding intersections.

The Traffic and Parking Assessment concludes that intersection of King and Dangar Streets will continue to operate at a “good” level of service (LoS A) under the Concept Plan, with average delays remaining at 10 seconds in the morning and evening peak periods, consistent with the existing situation. Vehicle crossings into and out of the site will also continue to function at LoS A/“good”, with average peak periods delays of 8 seconds. It is therefore considered that the Concept Plan will have no adverse effects on the intersection and is therefore acceptable in this regard.

### 5.12.3 Effects of the Project Application

As the numbers of beds and staff working on the site proposed by the Project Application development are a fraction of the number for the Concept Plan development, it can be assumed that impacts in terms of traffic volumes will be smaller. Given the acceptability of the Concept Plan in respect of traffic volumes, the Project Application development is also, therefore, acceptable.

### 5.12.4 Parking – Concept Plan

The Traffic and Parking Assessment at Appendix O finds that the proposed 212 spaces is consistent with car parking rates in Council’s Parking DCP, which would require the provision of 174 spaces. This is also indicated in

**Table 5.** Halcrow MWT finds that proposed car parking areas will comply with the relevant requirements for aisle widths and vehicle circulation.



The Traffic and Parking Assessment also considers travel to work patterns of staff at the existing aged care facility to derive rates at which to calculate likely demand for parking on the site. Halcrow MWT find that this demand will be generated at a rate of 1.1 space per day shift staff member. Applying this rate to the proposed operation of the Concept Plan results in an overall demand for 207 spaces. The proposed 212 spaces will, therefore, more than meet demand.

The Assessment concludes that the Concept Plan will adequately provide for car parking and that impacts to on-street parking will be minimised. Halcrow MWT concludes that if more parking were provided, this may discourage the use of public transport, contrary to State and local planning objectives.

Notwithstanding the adequacy of parking provision, the Assessment notes that the site has street frontages of up to 500m, which equates to around 85 on street spaces. Given this, it could be reasonable expected that some on-street spaces in the area would be used by Montefiore Jewish Home staff.

#### 5.12.4 Parking – Project Application

Referring the Table 4.11 in the Traffic and Parking Assessment, the Project Application for Stage 1 of the development requires 118 spaces to be provided, consistent with the Parking DCP. As 175 spaces are proposed to be provided on the completion of the Stage 1 development, the Project application is consistent with Council objectives and controls, with additional capacity for 57 cars.

Applying the traffic generation rate of 1.1 spaces per Montefiore Jewish Home staff member used by Halcrow MWT to assess likely demand to Stage 1 of the development, 168 spaces are required. The project application therefore also accords with the demand rate identified by Halcrow MWT. It is therefore considered that the Project Application development also adequately provides for car parking and that impacts to on street parking will be minimised.

#### 5.12.6 Recommendations for Minimising Impacts to On-Street Parking

The Traffic and Parking Assessment includes the results of car parking surveys taken in June 2009 that found that around 80% of on-street car spaces in King Street are occupied throughout the day. Dangar Street spaces were 56 to 73% occupied throughout the day Prince Street / Church Street was 70 to 98% occupied. The Assessment found that some of this demand is likely to result from commercial uses including the existing Montefiore Jewish Home and the nearby TAFE and bus depot. Halcrow also found that existing parking areas on the site are typically filled to less than 80% of their capacity and that there are at least 30 space available on the site throughout the day.

The staff questionnaire undertaken by Halcrow MWT which found that 21.8% of staff who drive prefer to park in on-street spaces examined the reasons for this preference. Reasons given included not possessing the security swipe card required to gain access to onsite parking. From this Halcrow MWT has concluded that if access to onsite spaces were more available, then the number of cars parked in the street during the day would reduce from 35 to around 9.

In response to the findings of the questionnaire, Montefiore Jewish Home made security swipe cards available to more of its staff. Staff were re-surveyed following the wider availability of swipe cards. It was found that the number of cars parked in onsite spaces increased by up to 16 (an increase of 8%) in the morning peak period.

The second staff survey found that the increase in onsite parking brought about by the wider availability of security swipe cards resulted in a decrease in demand for on-street parking in surrounding streets.

For instance, referring to Appendix H of the Halcrow MWT report, the number of vehicles parked on King Street adjacent to the site was found to have decreased by around 17 from approximately 47 vehicles during the morning peak period, following the wider distribution of the card. The biggest reduction was found to be at 4.45pm, when the number of vehicles parked adjacent to the site on Dangar Street fell from 49 to 38.

Given the positive impact on on-street parking that has resulted from the wider availability of the security cards, all additional staff employed on the site as part of the proposal will be issued with the cards. This will assist in minimising the effects of the proposal on on-street parking.

### 5.12.7 Consideration of Bus Depot Operations

Section 5 of the Traffic and Parking Assessment addresses the likely effects of the construction of the Concept Plan development on the operation of the STA bus depot located on King Street to the west of the site. As discussed in the Assessment, the depot operators have advised that bus movements into and out of the depot are subject to the following peak periods:

- Peak 1 - outgoing: 6.30am to 8.00am. The majority of buses leaving the depot during this peak travel west towards Allison Road, away from the site;
- Peak 2 - returning: 9.00am to 9.30am. The majority of buses entering the depot during this peak are approach from Allison Road to the west and so do not pass the site;
- Peak 3 - outgoing: 2.45pm to 3.30pm. The majority of buses leave the depot travelling west towards Allison Road away from the site; and
- Peak 4 – returning: 6.00pm to 7.00pm. The majority of buses arrive from Allison Road to the west.

Construction works on the site will take place between 7.00am and 5.00pm Monday to Friday and 7.00 to 1.00pm Saturdays. As Peak 4 occurs outside of these times, it will not be affected by construction on the site.

During peaks 1, 2 and 3, the majority of buses either leave the depot travelling west, away from the site, or do not pass it. Further, the Halcrow MWT Assessment found that volumes of construction traffic likely to be generated by the proposed construction will not be sufficient to cause significant impacts on the operation of bus routes that pass along surrounding streets to and from the depot.

Ongoing consultation with the bus depot operators will be undertaken during the development of CTMPs for each of the three stages of construction works to ensure that measures are in place to prevent adverse impacts to the operation of the depot.

## 5.13 Water Cycle Management

The Stormwater Design Report by Emerson Associates at Appendix U assesses the performance and effects of the proposed stormwater management system to be implemented during Stages 1 to 3 of the Concept Plan, as described in Section 3.13 and the Stormwater Management Plan at **Appendix U**.

The Assessment notes that the existing development on the site is subject to Council requirements including:

- Stormwater discharge from the site to the Council pipeline to the west is to be limited by detention to the equivalent flow produced by a 1 hour 5 year annual recurrence interval (ARI) rainfall event for the undeveloped site;
- Combined flow from the discharge to the west is to be limited to the capacity of downstream pipework;

- The detention storage on the site is to be increased by 50% to allow for the lack of an overland flow path through adjacent downstream properties to the west; and
- The Council diversion pipeline that passes through the site from King Street, and around the existing childcare centre to connect with the site discharge pipe at the western boundary must be oversized in order to accommodate increased flows in future, following upgrades to downstream pipework.

The report concludes that the proposed stormwater system will at all times be consistent with Council Requirements.

The detention system for the site has been designed for the 1 in 100 year ARI rainfall event and the probable maximum flood (PMF) event. Detention basin R1 will be big enough to accommodate one and a half times the volume of rainwater anticipated to be flowing into it during the 1 in 100 year ARI event. This will cater for downstream blockages or exceedences of the 100 year ARI event.

The report finds that the PMF level for the site is at RL38.1AHD. As habitable floor levels throughout the proposal will be at a minimum of RL41.3 AHD, they will be 3.2m above the PMF level and so will not be inundated during a PMF event.

## 5.14 Salinity

In order to satisfy the DGRs, a Preliminary Desktop Salinity Assessment has been undertaken by Environmental Investigation Services (**Appendix W**).

The Assessment considered available geotechnical data, regional geology, hydrogeology and the Salinity Potential in Western Sydney Map 2002 produced by the then Department of Infrastructure, Planning and Natural Resources. The assessment also includes reference to the results of borehole tests in proximity to the site. The Assessment notes that, based on an interpretation of the geological formations and soil groups on the Salinity Potential in Western Sydney Map, the site is not located in a region of salinity potential. Further the Assessment concludes that *“the risk associated with salinity to the proposed development is relatively low”*.

## 5.15 Geotechnical Conditions

A Preliminary Geotechnical Assessment of the site has been undertaken by Jeffery and Katauskas Pty Ltd and is provided at **Appendix V**. The Preliminary Geotechnical Assessment includes a review of previous reports relating to geotechnical conditions on the site and the findings of a walkover assessment and includes findings relating to likely subsurface conditions.

The preliminary assessment identifies principle geotechnical features on the site in relation to the proposed development. Jeffery and Katauskas recommend that, should any of the features identified be critical to the development, such features should be located more accurately using instrument survey techniques.

On the basis of the data considered, the Preliminary Geotechnical Assessment makes recommendations for the proposed future construction. These include recommendations for demolition, excavation, mitigation of vibration and ground surface movements, seepage, fill, basement tanking, retention and the use of batters, installation of footings and piles and subsurface preparation.

The report's recommendations require confirmation through further geotechnical investigations, particularly into the south-eastern and south-western corners of the site. Further investigations may be undertaken at Construction Certificate stage.

The scope of further investigations should include bedrock depths and the quality of bedrock with regard to allowable bearing pressures for footing design and groundwater levels and their potential implications, such as those for excavation, stability and the possible need for basement tanking.

Subject to the requirement for further investigation, the assessment did not identify any geotechnical constraints that would adversely affect future construction outcomes on the site or preclude future development from taking place.

## 5.16 Contamination

Cetec has conducted a Site Contamination Review of the site (**Appendix R**), which considers previous site investigations, environmental management plans (EMPs), validation reports, remedial action plans (RAPs) and Site Audit Statements prepared by auditors accredited under the Contaminated Lands Management Act 1997. The Review also considers the findings of a walkover assessment by Cetec. A list of the documents reviewed by Cetec is included in the Site Contamination Review.

The Review notes that extensive environmental investigations and remediation works have been undertaken on the site to remediate contamination from substances including Hydrocarbon, Lead and polycyclic aromatic hydrocarbon (PAH) Impacted soils. Soils found to be contaminated as a result of previous uses of the site have been placed in containment cells located beneath existing buildings and under existing open space area.

Cetec reviewed three Site Audit Statements prepared for the site. Statements 183 and 183/2 prepared in September 2002 and November 2003 respectively relate to Part 1 of the site, which comprises the majority of the land, with the exclusion at the intersection of King and Dangar Streets. Statement SA183/3 relates to Part 2 of the site, which comprises the area adjacent to the intersection of King and Dangar Streets.

Site Audit Statement 183/2, being the most recent prepared for Part 1 of the site concludes that the site is suitable for a residential aged care facility and landscaped open space. Statement 183/2 finds that Part 2 of the site is suitable for residential aged care facility, a cafe and landscaped open space.

Containment cells are located in the south east corner of the site adjacent to Dangar Street and King Street. These cells are likely to be impacted by the Project Application works. The Assessment recommends that further investigation of these cells will be required prior to the construction works taking place. Such further investigations may take place once Construction Certificate Plans are available and the locations and depths of footings are known. While the precise nature of the remediation required on the site cannot be known, Cetec considers that it is likely that any contaminated soil in the cells encountered during construction can be remediated by:

- Removal and disposal off-site in accordance with the relevant guidelines; or
- Segregation and enclosure in an existing containment cell in the site and managed as per an appropriately prepared Environmental Management Plan

Cetec concludes that the site is suitable for the intended purpose, subject to further investigation and remediation works. Accordingly, the proposal satisfies the requirements of SEPP 55.

## 5.17 Environmentally Sustainable Development

The Sustainability Strategy by Cundall Associates at **Appendix Q** sets out measures to be implemented in order to reduce the environmental impact of the proposed development through, amongst other outcomes, reductions in energy and water consumption. It is noted that the DGRs require that State Environmental Planning Policy BASIX (SEPP BASIX) to be addressed in this EAR. However, Cundall considers that, as the BASIX scheme is based on benchmarks that relate to single dwellings and as the proposal is for a building classified as 9C under the Building Code of Australia, BASIX benchmarks are not an exact fit for the proposed residential aged care facility. BASIX certification will be lodged with Development or Project Applications for future self-care accommodation in Envelope F.

As stated in the Sustainability Strategy, Cundall has discussed the application of the Green Star Tool with the Green Building Council of Australia (GBCA), the organisation that administers Green Star. From this discussion it was concluded that the project does not meet the eligibility requirements of the Green Star Healthcare assessment tool. Furthermore, as an Aged Care development, the proposal is considered neither by the Healthcare nor the Multi-Unit Residential tools.

Cundall understands that the GBCA is developing an assessment tool for aged Care facilities, but that the anticipated timeframes for finalising and releasing the tool preclude its application to the proposal.

It is therefore considered that the most appropriate benchmark for assessing the performance of the proposal can be found in data relating to the performance of the existing building in terms of energy and water efficiency.

Cundall recommend the following targets to be achieved against the base case of the performance of the existing building:

- A reduction of 40% in the amount of carbon released into the atmosphere compared with the existing building.
- A reduction of 25% in the amount of potable water consumed compared with the existing building;
- Increased levels of indoor environmental quality through additional ventilation and daylight access;
- A commitment to assessing instances in which “environmental friendly” building can be utilised in construction and implementing the use of such materials; and
- A commitment to reviewing annual resource usage with the aim of achieving the City of Sydney Council’s targets of a 70% reduction in carbon emissions by 2050.

Strategies recommended by Cundall to meet the above targets include:

- A 40% reduction in the annual energy consumed by the lighting system in the proposed buildings. This will be achieved through a combination of lighting controls and efficient LED lighting;
- A 20% reduction in annual “small power” energy consumed through a review of domestic appliances used by residents;
- A 40% reduction in annual energy consumed in cooling through the use of switching technology, improvements in natural ventilation and room ceiling fans;
- A 20% reduction in annual energy consumed in the provision of heated water;
- A 20% reduction in energy consumed in base building systems;
- A 50% increase in fresh air over code compliance with the use of heat recovery units;



- A cogeneration system which will generate electricity for use in the aged care home from waste heat given off by gas water heating systems on the site;
- Use of recycled rainwater for irrigation and toilet flushing; and
- Use of water efficient appliances/ tapware.

Cundall Associates conclude that the above strategies will achieve the targets of a reduction of 40% in the amount of carbon emitted in the proposed operations and a 25% reduction in water consumption.

The Building Code of Australia (BCA) Section J Assessment, also by Cundall Associates at **Appendix T** concludes that the project is capable of complying with Section J of the BCA, subject to the implementation of recommendations made in the Assessment.

## 5.18 Consultation

In accordance with the Environmental Assessment Requirements for this project issued by the Director-General consultation must be undertaken with relevant public authorities, community groups and affected landowners. This section details the consultation undertaken as part of the preparation of the Concept Plan.

Given the significance of the existing aged care facility in terms of the surrounding built form and social context, the proponent has maintained a continual process of engagement with the Randwick Community and other stakeholders regarding the expansion of the facility.

This process commenced when submissions to Council were made by individuals and by the Randwick North Action Group (RNAG) and Randwick Precinct Committee (RPCC) in response to the exhibition of the Stage 1 DA for the expansion of the existing aged care facility.

Since the lodgement of the Stage 1 DA, the proponent has implemented a community consultation strategy aimed at improving the community's knowledge of the proposed expansion of the home and gaining an understanding of community concerns. This strategy utilised public presentations and meetings as well as written and telephone correspondence with individuals who prefer not to discuss matters in public fora. In addition, meetings have also been held with RPCC and RCC representatives. Quarterly newsletters published by the Proponent and distributed to residences surrounding the site have informed the community as to developments in the design of and approvals process for the project.

Community consultation initiatives undertaken to date include:

December 2008	Presentation of the proposed expansion of the aged care facility at a meeting of the RPCC;
April 2009	Mediation meeting between the Proponent and community members/RNAG/RPCC;
May 2009	Formal comments from RPCC;
June 2009	Meeting with Council to discuss submissions made to Council regarding the proposed expansion and matters raised by Council;
November 2009	Publication and distribution of a newsletter by the Proponent to members of the community regarding the withdrawal of the Stage 1 DA and intention to lodge an application under Part 3A of the EP&A Act for the expansion of the facility;

November 2009	Consideration by the Proponent of submissions from two members of the community. Written responses to the two submissions were provided by the Proponent within two weeks;
January 2010	Meeting between the Proponent and two members of the RPCC;
February 2010	Presentation by the Proponent at a meeting of the RPCC;
March 2010	Consideration by the Proponent of a submission from a member of the community regarding solar access. A written response was provided by the Proponent within a week;
March 2010	The Proponent held a tour of the existing aged care facility open to all members of the community and any other stakeholders. An open invitation to the tour was announced during the February RPCC meeting and was attended by 37 people;
April 2010:	Publication and distribution of a newsletter by the Proponent to members of the community regarding design changes made in response to community submissions and timeframes for the lodgement of the Concept Plan application.  The April 2010 newsletter included an open invitation to a second tour of the existing facility;
May 2010	Consideration by the Proponent of a submission from a member of the community regarding on-street car parking. The Proponent responded in writing and in telephone correspondence within a week;
May 2010	Meeting between the Proponent and two members of the RPCC; and
June 2010	Presentation regarding the proposed development made by the Proponent at an RPCC meeting, including announcement of the Home's intention to hold an Information Session on site and a request for suggestions from the RPCC on the best time and date for the session;
July 2010	Consideration by the Proponent of two submissions from a members of the community regarding car parking. Written responses were provided by the Proponent within two weeks;
July 2010	Consideration by the Proponent of a submission from a member of the community regarding the provision to the community of detailed information relating to the proposal. A written response was provided by the Proponent within two weeks and followed up with a telephone call;
July 2010	Publication and distribution of a letter by the Proponent to members of the community regarding design changes made in response to community concerns, timeframes for the lodgement of the Concept Plan application and an invitation to an Information Session to be held on the site on 1 August.
August 2010	The Proponent held an Information Session on the site, at which Architectural Plans and a 3D model of the proposal could be viewed.

The consultative processes outlined above have informed and influenced the design of the proposed development. The Proponent also considers that these processes have improved the community's understanding of the project.

## 5.19 Construction Impacts

The Preliminary Construction Management Plan (CMP) at Appendix S sets out measures to ensure that the construction of Stage 1 of the development, which is subject to the Project Application, will not result in adverse impacts in terms of acoustic amenity, air quality, pedestrian access and traffic. The measures set out in the CMP are reflected in the Statement of Commitments in Section 6.0. They are preliminary in nature and will be given in greater detail once a head contractor has been appointed to the project. More detailed CMPs will be submitted at Construction Certificate Stage. The preliminary measures include:

- The erection of temporary security fencing around the perimeter of the site to ensure individual do not enter the site wilfully or otherwise unless authorised;
- Plant and equipment will be selected, managed and controlled in order to ensure its operation does not result in adverse acoustic or vibration impacts;
- Noise control measures will be implemented across all operations to ensure construction complies with the relevant noise and vibration control guidelines including those set by the Environmental Protection Agency;
- Twenty-one existing Montefiore Jewish Home residents residing in rooms on the eastern side of Building C will be relocated to other rooms located within home prior to any works to further separate residents for the location of the works. This will serve to ameliorate impacts to the amenity enjoyed by residents;
- Access to the site for larger construction vehicles will be on the eastern side of the Burger Centre at a point on Dangar Street to be determined by the contractor to minimize impacts to the round-about on the corner King and Dangar Streets;
- All drivers of site-related vehicles will be made aware of services entering and leaving Randwick Bus Depot located on King Street, to ensure that bus service operations are not disrupted;
- It is estimated that there will be approximately 35 trucks attending site during peak activity. The access both on and off of site of these vehicles will be controlled by traffic management staff. Movements in and out of the site will be controlled and consider pick-up and drop off times of the existing pre-school on the site and neighbouring schools;
- Access onto the site for emergency service vehicles and emergency exits out of the building will be maintained;
- Community consultation processes will ensure local residents remain adequately informed and that complaints are adequately handled; and
- Recycling of construction and demolition waste will be implemented where practicable, with a target of 80% of waste being reused or recycled.

CMPs will be prepared for the construction of subsequent stages as part of Project/Development Applications for the Concept Plan development.

As discussed in the Traffic and Parking Assessment at **Appendix O**, in addition to CMPs, Construction Traffic Management Plans (CTMPs) will be prepared specifically for each stage of the construction.

## 5.20 Erosion and Sediment Control

An Erosion and Sediment Control Plan shall be prepared and included in a detailed CMP for the Project Application development. The detailed CMP will detail the location of temporary erosion and sedimentation control measures including fencing and silt traps as necessary and shall be installed prior to the commencement of works.

Existing drainage lines likely to be affected by the worksite shall be identified and protected using siltation barriers, placed such that they intercept run-off from exposed surfaces. Temporary drainage controls for the site compound, including diversion drains and perimeter banks, shall be established as appropriate to cope with any significant quantities of stormwater coming into the site via temporary access created during site works. Stockpiles of materials or debris shall be kept clear of water courses and/or surrounded by sediment filter fencing, sandbags or straw bales.

## 5.21 Social Impact and Economic Impact

The proposal will result in several positive social and economic impacts, including:

- The provision of aged care housing to meet anticipated demand for such housing, as identified by Department of Planning population forecasting;
- The provision of seniors' living accommodation in proximity to medical and community services in Randwick Centre and the Prince of Wales Hospital, thereby promoting convenient access to these services, consistent with State government policy;
- The proposal will increase the provision of housing generally, thereby promoting housing affordability;
- If the land is not used for the proposed development, an opportunity would be lost for the provision of an aged care facility in a location identified by State Government Policy as appropriate for such development and which would allow people to "age in place", close to existing community and family ties. It is considered that there is a general lack of alternative sites within the same ring around Randwick shops and the medical hub that would enable the achievement of key strategic outcomes;
- The orderly staging of the proposed Concept Plan development and the use of a presently underutilised site will promote the economic use of land; and
- The provision of an employment generating use in a residential area close to public transport routes will promote the use of public transport in by commuters.

## 6.0 Draft Statement of Commitments

In accordance with the Director-General's Environmental Assessment Requirements, the proponent is required to include a Draft Statement of Commitments in respect of environmental management and mitigation measures on the site. Table 10 contains the commitments made by the Proponent to manage and minimise potential impacts arising from the project.

**Table 12 – Statements of Commitment**

Subject	Commitments	Approved by Whom	Timing
<b>Concept Plan</b>			
Approved Project	Development on the site will be implemented in accordance with the Concept Plan entitled 'Montefiore Concept Plan' prepared by Jackson Teece Architects and dated July 2010.	Department of Planning	No timing. General Statement of Commitment
<b>Concept Plan</b>			
Preliminary Construction Management Plan	<p>A detailed construction management plan will be prepared for each stage that addresses the following matters:</p> <ul style="list-style-type: none"> <li>- Noise and vibration impacts from demolition and construction activities, particularly on the existing Montefiore facility</li> <li>- Dust from demolition and construction works</li> <li>- Storm water runoff</li> <li>- Removal of Hazardous Materials</li> <li>- Waste Water</li> <li>- Air Quality</li> <li>- Construction Traffic</li> </ul>	Department of Planning	Prior to the issuing of a construction certificate
<b>Stage 1 Project Application</b>			
Preliminary Construction Management Plan	<p>In accordance with McLachlan Lister's recommendations (July 2010), construction on site will be carried out in accordance with the following recommendations:</p> <p><b>Construction Requirements</b></p> <ul style="list-style-type: none"> <li>- Fences and hoarding will be provided to prevent unauthorised access to the site during construction</li> <li>- Site offices and amenities will be provided on site in the most suitable location to minimise disturbance to Montefiore's current operations</li> </ul> <p><b>Montefiore Residents</b></p> <ul style="list-style-type: none"> <li>- Residents on the eastern side of Building C will be relocated elsewhere within the facility during construction to ensure residential amenity is maintained</li> </ul> <p><b>Traffic Management</b></p> <ul style="list-style-type: none"> <li>- The contractor will provide appropriate RTA standard traffic control plans during construction</li> <li>- Pedestrian access on King and Dangar Streets will be maintained</li> <li>- The Contractor will implement a traffic management plan to reduce the amount of time that trucks are in the surrounding streets</li> <li>- All drivers of site related vehicles will be made aware of the requirement to mitigate disruption to Randwick Bus Depot</li> <li>- As often as practicable, large truck movements will occur outside peak movement times</li> <li>- Access and egress to the site will be managed by traffic management staff via the main entrances on King or Dangar Streets</li> <li>- It is intended that adequate temporary onsite parking facilities will be provided</li> </ul>	Department of Planning	Prior to the issuing of a construction certificate



Subject	Commitments	Approved by Whom	Timing
Preliminary Construction Management Plan	<p><b>Pedestrian Footpaths</b></p> <ul style="list-style-type: none"> <li>- Pedestrian access will be maintained along the footpaths of King and Dangar Streets during construction</li> </ul> <p><b>Site Access</b></p> <ul style="list-style-type: none"> <li>- Access for emergency vehicles will be provided via the driveway off Dangar street, which will be undisrupted by site works. In the event of a disruption a temporary access plan for emergency vehicles will be provided</li> <li>- Site deliveries will continue through Dangar and King Streets in coordination between Montefiore and the Head Contractor</li> <li>- All contractors will be made aware of the child care facility on King Street and its peak times. Large vehicular movements will be coordinated so as not to occur during the child care centres peak times.</li> <li>- Minibus drop off points will be maintained and temporary parking facilities provided.</li> </ul> <p><b>Noise and Vibration Mitigation</b></p> <ul style="list-style-type: none"> <li>- Environmental Protection Agency guidelines shall be adopted during construction to minimise noise and vibration and compliance will be verified by appropriately licensed and experienced contractors</li> <li>- Works will occur only between the hours of 7.00am and 5.00pm Monday to Friday and 7.00 to 1.00pm Saturdays</li> <li>- Noise and vibration sensors and alarms will be installed where necessary</li> <li>- Where practicable, piling will be bored rather than impact driven and equipment will be fitted with noise suppression devices where possible</li> <li>- Regular correspondence will be maintained with local residents and Montefiore residents and staff to inform of timing and any works which may impact on their amenity, and address any ongoing issues or concerns</li> </ul> <p><b>Dust from Demolition and Construction Works</b></p> <ul style="list-style-type: none"> <li>- Appropriate mitigation measures will be undertaken to reduce the impacts of dust from demolition works. Including hosing down demolition vehicles; dampening rubble; and crushing precast elements offsite</li> </ul> <p><b>Storm Water Runoff</b></p> <ul style="list-style-type: none"> <li>- Silt socks and filter fabric will be used in stormwater runoff pits and gutters</li> </ul> <p><b>Removal of Hazardous Materials</b></p> <ul style="list-style-type: none"> <li>- Works will not commence until the hazardous material assessment has been completed and disposal methods developed</li> </ul> <p><b>Waste Water Collection</b></p> <ul style="list-style-type: none"> <li>- Waste water will be treated prior to disposal</li> </ul> <p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>- Burning of combustible materials on site is not permitted</li> </ul> <p><b>Complaints</b></p> <ul style="list-style-type: none"> <li>- Throughout construction, McLachlan Lister's Project Managers contact details will be displayed on the external facing of the construction site and in correspondence to surrounding residents. Verbal responses to complaints will generally be provided within 1 hour and written responses within 1 day.</li> </ul>	Department of Planning	Prior to the issuing of a construction certificate

Subject	Commitments	Approved by Whom	Timing
Preliminary Construction Management Plan	<p><b>Safety</b></p> <ul style="list-style-type: none"> <li>- The Head Contractor will be required to establish a comprehensive Work Safety Plan before commencement</li> <li>- Safety risks will be identified and specific measures developed and implemented</li> <li>- Approved work method statements will be strictly adhered to by all site operatives</li> <li>- Site inductions for all workers and frequent visitors will be conducted prior to accessing the construction site</li> </ul> <p><b>Waste Management</b></p> <ul style="list-style-type: none"> <li>- The demolition contractor will be required to arrange sorting of demolition waste materials and endeavour to achieve a recycling target of 80%. Waste materials from the construction phase will be minimised and recycled as appropriate</li> <li>- All hazardous materials will be handled and disposed of in strict accordance with Environmental Protection Agency guidelines</li> <li>- All waste management processes will be in accordance with WorkCover's Occupational Health and Safety requirements</li> </ul> <p><b>Environmental Management Plans</b></p> <ul style="list-style-type: none"> <li>- An Environmental Management Plan will be prepared to address each stage of the project</li> </ul> <p><b>Erosion and Sediment Control</b></p> <ul style="list-style-type: none"> <li>- An Erosion and Sediment Control Plan shall be prepared detailing the location of temporary erosion and sedimentation control measures</li> </ul> <p><b>Tree Preservation and Protection Plan</b></p> <ul style="list-style-type: none"> <li>- The contractor is to provide a suitable tree protection plan to ensure any trees located on Dangar and King Streets are protected</li> </ul>	Department of Planning	Prior to the issuing of a construction certificate
Construction Traffic	CTMPs will be prepared specifically for each stage of the construction. The CTMPs will incorporate the principles discussed in Section 5.19 of this report and the Traffic and Parking Assessment at Appendix O.	Department of Planning	Prior to the issuing of a construction certificate
<b>Concept Plan and Stage 1 Project Application:</b>			
Stormwater Drainage	<p>In accordance with the Stormwater Drainage Plan prepared by Emerson Associates the following commitments will be adhered to:</p> <ul style="list-style-type: none"> <li>- While modifications are made to stormwater detention system components, the detention system will at all times maintain the existing approval conditions</li> <li>- The detention system is designed for the 100 year Annual Recurrence Interval rainfall event.</li> </ul>	Department of Planning	No timing. General Statement of Commitment
<b>Concept Plan:</b>			
Road Access and Traffic	<p>The following Road Access and Transport measures will be undertaken in accordance with the Traffic Assessment undertaken by Halcrow;</p> <p>A Green Transport Plan is proposed, which will promote the use of alternative transport to and from the site. Potential measures include:</p> <ul style="list-style-type: none"> <li>- A car sharing scheme, incorporating a data base to identify car sharing opportunities</li> <li>- Secure bicycle facilities</li> <li>- Travel plan noticeboards to advertise alternative transport information to staff, residents and visitors</li> <li>- Fleet cars to reduce the need for personal vehicles</li> </ul>		

Subject	Commitments	Approved by Whom	Timing
<b>Concept Plan:</b>			
Road Access and Traffic	<b>Onsite Parking provisions</b> <ul style="list-style-type: none"> <li>- At each development stage the proposal complies with minimum parking provisions in the relevant DCP and SEPP</li> <li>- Security access cards will be distributed to staff to encourage onsite parking and reduce the number of staff parking on neighbouring streets</li> </ul>	Department of Planning	Prior to issuing an Occupation Certificate for Stage 1
<b>Concept Plan and Stage 1 Project Application:</b>			
BCA Section J1 & J2 Deemed-to-Satisfy Review of Fabric and Glazing Requirements	The recommendations found in the report by Cundall, regarding the installation of insulation, roofs and ceilings, roof lights, walls, floors and external glazing, will be implemented to ensure compliance with Section J1 and J2 of the Building Code of Australia	Department of Planning	No timing. General Statement of Commitment
Contamination Review	<p>Detailed investigation into the impact of new buildings and landscaping on known contamination, both during and when in use, shall be conducted. This will include:</p> <ul style="list-style-type: none"> <li>- Re-evaluation of disturbed and surrounding soils to confirm mobility and leachability for classification</li> <li>- OHS control measures to prevent exposure to contaminants</li> <li>- Environmental control measures to prevent contaminant spread</li> <li>- Documentation of the quantities excavated and movement on site of impacted soils</li> <li>- Documentation of disposal of impacted soils</li> <li>- Report, approvals and permits requirements</li> <li>- Contingency and emergency response plans</li> </ul> <p>Any contaminated soil that is encountered during the construction process, or areas that require remediation will:</p> <ul style="list-style-type: none"> <li>- be removed and disposed off-site as per Environmental Guidelines; or</li> <li>- logged, segregated and returned to an existing containment cell and managed as per the updated Environmental Management Plan's requirements.</li> </ul>	Department of Planning and other relevant authorities	Prior to excavation and construction of each relevant stage
<b>Concept Plan:</b>			
Sustainability Strategy	<p>Best practice Ecologically Sustainable Development principles are to be implemented with the aim of achieving:</p> <ul style="list-style-type: none"> <li>- carbon emission reductions of 40% compared against the existing building</li> <li>- water use reductions of 25% compared against the existing building</li> <li>- 50% improvement in levels of fresh air over code compliance</li> </ul> <p>Key sustainability initiatives include:</p> <ul style="list-style-type: none"> <li>- The installation of a micro gas-fired cogeneration unit</li> <li>- Openable windows provided throughout and an efficient VRV system will pump 50% more fresh air through the building</li> <li>- Recycled rainwater collected from buildings D and E will supply the laundry, resulting in a 25% reduction in water usage compared to the existing building</li> <li>- Environmentally friendly materials will be used when practicable; and</li> <li>- A review panel will be established to assist in achieving a 70% reduction in carbon emissions by 2050</li> </ul>		Ongoing

## 7.0 Conclusion

The Concept Plan and Project Application seek approval for the expansion of an existing residential aged care home on a site located in proximity to community and medical services in Randwick Town Centre and the Prince of Wales Hospital.

The land in the locality in which the site is located has been specifically identified by the Department of Planning's draft East Subregional Strategy as suitable for the type of seniors housing proposed. The site will therefore satisfy subregional planning objectives in this regard, while also serving State Government objectives for "ageing in place" and promoting affordable housing through general increases in housing supply. The provision of aged care housing on the site will meet expected increases in demand for such housing that will result from changes in demography, as anticipated by Department of Planning demographic projections.

It is considered that there is a general lack of alternative sites within the same ring around Randwick centre and the Prince of Wales medical hub that would enable the achievement of key strategic outcomes. The implications of not approving the proposal therefore include the loss of the opportunity to provide an appropriately located aged care facility which will fulfil State government objectives and community needs. It is noted that the suitability of the site for the type of development proposed is supported by the granting of a Site Compatibility Certificate by the Director General for a previous iteration of the proposed design.

As demonstrated throughout this report, the proposal has been designed so as not to result in adverse environmental impacts, particularly in terms of built form character and amenity. Despite non-compliances with building height and floor space standards (which do not strictly apply to the development), the proposed building envelopes appropriately respond to surrounding built form context and take advantage of site topography that allows the provision of greater bulk and scale away from street frontages so as to minimise visual impacts to surrounding streetscapes.

The proposed development performs well with respect to the preservation of sunlight access and privacy of surrounding residential properties, as demonstrated by the proposal's compliance with State and local amenity controls. Views, vistas and outlook from surrounding streets and properties are appropriately considered and preserved in the context of the desired future character of the site and surrounding precinct.

Sufficient car parking will be provided and will exceed the requirements of local government development controls and anticipated demand. Improvements will be made to existing vehicular access to the childcare use on the site, which will be expanded and upgraded as part of the proposal, thereby providing a benefit to the community through the increased provision of childcare services.

The development will contribute positively to the public domain through the provision of high quality landscaped public open space and retail uses at the street frontage.

As demonstrated by specialist studies that accompany this EAR, the proposal will not result in adverse impacts in terms of water quality or soil salinity and has been found to be suitable for its intended purpose, subject to further investigations into potential contamination, which can be appropriately carried out following approval of this application.

The objects of the EP&A act will be served through the use of a partially underutilised site to provide a form of housing for which there is increased demand, thereby promoting the economic and orderly use of land.

A Draft Statement of Commitments has been prepared to inform the detailed design of the development and manage construction and on-going environmental impacts.

On the basis of the merits of the proposed development, its positive social and economic impacts and in the absence of resultant adverse impacts, we have no hesitation in recommending that the Minister approve the Concept Plan and Project Application under Section 75E and Section 75O of the EP&A Act.