

Amy Watson - MP09_0188 and MP10_0044 - Expansion of the existing Aged Care Facility at Sir Moses Montefiore Jewish Home

From: "Kevin Lim" <kevin.lim@sonycentre.com.au>
To: <amy.watson@planning.nsw.gov.au>, <plan_comment@planning.nsw.gov.au>
Date: 23/10/2010 11:26 AM
Subject: MP09_0188 and MP10_0044 - Expansion of the existing Aged Care Facility at Sir Moses Montefiore Jewish Home
CC: <premier@nsw.gov.au>, <sharon.armstrong@lpma.nsw.gov.au>, <coogee@parliament.nsw.gov.au>, <david.shoebridge@parliament.nsw.gov.au>, <john.kaye@parliament.nsw.gov.au>, <cate.faehrmann@parliament.nsw.gov.au>, <brad.hazzard@parliament.nsw.gov.au>, <lop@parliament.nsw.gov.au>, <general.manager@randwick.nsw.gov.au>, <murray.matson@randwick.nsw.gov.au>, <kiel.smith@randwick.nsw.gov.au>, <margaret.woodsmith@randwick.nsw.gov.au>, <paul.tracey@randwick.nsw.gov.au>

Kevin Lim
 Apartment 2403
 88-98 King Street,
 Randwick NSW 2031

In Reference to :

MP09_0188 and MP10_0044 – Expansion of the existing Aged Care Facility at Sir Moses Montefiore Jewish Home

100-120 King Street and 30-36 Dangar Street, Randwick

Dear Sir or Madam:

I live adjacent to the proposed development site of Montefiore Aged Care Facility on lot 37 of the Centennial Apartments and am writing to ask that you vote against this planning application.

Following are my comments and objections relating to this planning application:

Reasons against this Development

Density-

the FSR (Floor Space Ratio) is substantially above that permitted, even allowing for the 0.5:1 bonus for this type of development. The FSR of 1.43:1 exceeds the 1.14:1 allowed into the 2b zone. This equates to 7276sqm over.

In the Residential 2C zone, the proposal is over by 947sqm.

In total this adds up to 8223sqm over which is equivalent to an excess of 164 x 1 bedroom apartments (assuming 50sqm apartments or 85 x 2 bedroom apartments).

Existing planning controls in the area surrounding the site are predominantly residential 2C to the south and Residential 2A to the north so that the bulk and scale intended by the planning control under the RLEP is that of low to medium density residential.

There are breaches in density and height in the current proposal.

The proposal is at the upper limit that the site can tolerate relative to the existing and future character of surrounding development under the established Residential 2C and Residential 2A zonings.

Height-

Proposed Building F, the height is 10.7m over that permitted in the 2c zone which is equivalent to 3 storeys above that allowed and 3-storeys above the roof of the Centennial apartment building (proposed RL of 58.53 compared with RL of 49.29 at Centennial Apts, a difference of 9.24m in height). This is associated with the new building to the east of the Centennial Apartments.

The bulk of the proposed Buildings D (on Dangar Street) and E (on King Street) is excessive and out of character for area.

Parking-

It is evident that staff, visitors, and volunteers are using the surrounding streets and that there is inadequate parking on site. The use of the onsite open grassed areas for parking confirms that there is insufficient parking on site. These real experiences should take precedence over parking surveys with assumed rates.

King Street is already a busy and congested road; this additional concentration of traffic and roadside parking will cause traffic problems and create a safety hazard for other motorists, school children, their parents and other residents. The amount of extra traffic during staff change over and drop off and pick up of children to the child care centre.

Covenant -

given that the north-western area is used for stormwater detention and has been landscaped, it is requested that a covenant be placed upon this part of the site to avoid future development expansion. This would prevent any further development in proximity to the Govett Lane properties and the broader heritage conservation area.

Visual impact to Centennial Apartments-

at present, a substantial number of apartments have their primary and in the majority of cases, have their sole outlook to the east over open space and landscaping. This is proposed to be replaced with a 6-storey building, which sits high above the roof of these apartments. The western setback is proposed as a child play area with no opportunity for meaningful landscaping. These units will be facing an apartment block, while setback in accordance with the setback controls, exceeds the height limit by over 10m while the degree of excess (over 8000sqm) cannot justify such an impact. The length of the 6-storey building facing Centennial Apartments is 60metres, which extends beyond two out of three apartment buildings facing east.

Ours is one of these apartments and the block F will overlook our property; this will lead to a loss of privacy, light from overshadowing and outlook and will certainly impact on the peaceful enjoyment of our home and balcony. Our apartment has **only one window, which is our only source of natural light and view.**

Child Care Centre-

It is proposed to extend the size of the centre from 60 to 80 children. The applicant's report states that the existing 8 spaces for 30 children is inadequate (approx 1 per 4) yet states that the proposed 13 spaces will be satisfactory yet adopts the same rate as the existing centre which has acknowledged parking problems.

The Proposal talks about an increase from 30-50 child care places, in fact Moriah College has lodged an amended DA to Randwick Council requesting an increase from an already approved 60 placed to 80. The credibility of the concept plan for Building F is already under question.

If the Concept Plan and Development Application are approved without substantial reductions, the precedence for high-density developments in low to medium density areas such as Randwick North will be the benchmark for any future developments.

I believe the building will be visually overbearing. The proposed scheme – in terms of its sheer size, height, scale and intensity– is totally out of character with the existing street.

By any reckoning, it is a gross over development of a relatively small site. It will be starkly incongruous to neighbouring properties.

This development will overwhelm King Street and Dangar Street and have an environmental impact.

Deliveries will be more regular catering for more people adjacent to our home causing noise, pollution and dust at all times of the day and night.

Increased smell from the commercial kitchen the home currently runs.

The construction work necessitated by this development will create intolerable, long-lasting nuisance problems for the local community.

Inevitably, there will be intense noise, vibration, airborne dust, pollution, increased volumes of vehicular movements and so on.

All this noise and pollution will acutely affect children attending the child care centre.

The children's ability to learn and their enjoyment of both classes and play activities will be badly affected by the noise, disruption, pollution and stress generated by this long-term, large-scale development.

The proposed expansion of the age care facility will intensify the already intolerable pressures on services/ infrastructure, doctor and hospital facilities, and public transport.

We believe that if the proposed development goes ahead, it will have a serious – and negative – impact on the value of homes on the street. Not only will our day to day living be effected, we are left in a situation of possible negative equity which is heart breaking when all our savings and earnings have gone into this property never mind the burden of our mortgage.

Increased noise of ambulances, which we hear quite regularly already.

Therefore, we ask you to vote against this expansion and encourage the Architects to resubmit a building design that is smaller, less intrusive on neighbouring properties, and more sensitive to the character of Dangar Street and King Street.

Should you require any additional information, clarification of any comments made, or would like to arrange a visit to our home; please contact me on my number listed below.

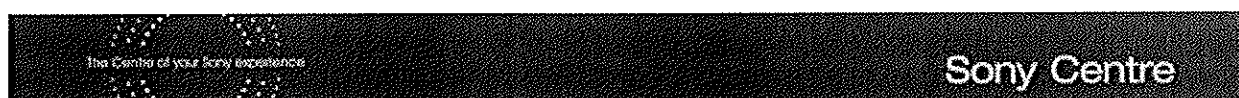
Regards

Kevin Lim

General Manager Retail Operations

Sony Centre NSW

Ph: 0439 988 048



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(38)

Amy Watson - FW: Montefiore Objection

From: Ben Kirkland <Ben.Kirkland@optus.com.au>
To: "amy.watson@planning.nsw.gov.au" <amy.watson@planning.nsw.gov.au>
Date: 25/10/2010 9:31 AM
Subject: FW: Montefiore Objection

To Whom It May Concern

I would like to submit my strong reasons for the objection against the development of Montefiore. I am a resident in building 2 of Centennial apartments and will be directly impacted by the development.

Please see my key reasons against this massive development.

Primarily Building F - (density, height, overshadowing, setback from Centennial), parking issues on King and Dangar Streets, and overall bulk.

Density

- the FSR (Floor Space Ratio) is substantially above that permitted, even allowing for the 0.5:1 bonus for this type of development. The FSR of 1.43:1 exceeds the 1.15:1 allowed in the 2B zone. This equates to 7276sqm over the legal requirement for zone 2B. In the Residential 2C zone, the proposal is over by 947sqm.
- In total this adds up to 8223sqm over which is equivalent to an excess of 164 x 1-bedroom apartments (assuming 50sqm apartments or 85 x 2-bedroom apartments).
- Proposed building bulk to not compatible with the surrounding built forms and heavily impacts on building bulk of nearby houses, apartments, open spaces and streetscape. It is not enhancing the desired future character of the streetscape and the locality of North Randwick Heritage area.

Height

- Proposed Building F, the height is 10.7m over that permitted in the 2C zone which is equivalent to 3 storeys above that allowed and 3-storeys above the roof of the Centennial apartments building (proposed RL of 58.53 compared with RL of 49.29 at Centennial Apartments, a difference of 9.24m in height). This is associated with the new building to the east of the Centennial Apartments (building F), thus creating overshadowing and loss of privacy and views for residents.
- The bulk of the proposed Buildings D (on Dangar Street) and E (on King Street) is excessive and out of character within this Heritage listed area.

Visual Impact to Centennial Apartments (overshadowing, setbacks) - Zone 2C (next to heritage listed chimney)

- Presently, a substantial number of apartments have their primary and in the majority of cases, have their sole outlook to the east over open space and landscaping. This is proposed to be replaced with a 6-storey building, which sits high above the roof of Centennial. The western setback is proposed as a child play area with no opportunity for meaningful landscaping. These units will be facing an apartment block, while setback in accordance with the setback controls, exceeds the height limit by over 10m while the degree of excess (over 8000sqm) and cannot justify such an impact. The length of the 6-storey building facing Centennial Apartments is 60 metres, which extends beyond two out of three apartment Centennial buildings facing east.
- There are private open spaces (courtyards and balconies) and landscaped areas which flows on from the bedrooms and living areas of Centennial - this will be inhabited by Building F's height, bulk, close setback and overshadowing. Building F is proposed to be built down the length rather than across the site creating overshadowing and inhabiting the outdoor living spaces, recreation use of grass and trees and therefore reducing the residents quality of life and inhabiting their outdoor space.
- Overshadowing Centennial will cast these units into low level solar access therefore reducing solar

access in the living and bedroom areas to less than 3 hours solar per day. On flow of this will be insufficient outdoor clothes drying time along with the grass, trees, plants, and sustainable vegetation unable to grow by not having enough solar access. The solar access will breach the legal requirement of sun maintained between 9am - 3pm. Currently the sun hits these apartments when it rises therefore losing 3.5 hours+. The shadow diagrams proposed is not a true reflection of the solar access current and proposed.

- The most impacted Centennial apartments face NE where the only source of sunlight is from where the proposed Building F is to be built. Their living space and bedrooms currently look out on the landscaped area of Centennial grounds and Montefiore. This is going to be significantly impacted by the bulk, height and setback killing all plants, trees and vegetables etc that residents grow along with invasion of privacy as Montefiore will be able to look into the living space and bedrooms of Centennial residents.
- External and internal lighting will be intrusive and a nuisance for nearby residents of Centennial, the lights will be on 24/7 as already proven with the current buildings lights (building A & B). It will be worse as the building will be on top of residents and shine into the living rooms and bedrooms of residents.
- Setback and height is insufficient and not enough adequate separation between the buildings for landscaping, visual & acoustic privacy, sunlight penetration and private open spaces. Centennial residents will lose privacy, views, solar penetration, visual privacy, acoustic privacy, landscaping and the use of their outside spaces along with the environmental impact this will have.
- Are there any radioactive, antennas, air conditioning units etc on top of the buildings? This hasn't been identified which will impact on local and Centennial residents.

Parking

- It is evident that staff, visitors and volunteers are using the surrounding streets and that there is inadequate parking on site. The use of the on-site open grassed areas for parking confirms that there is insufficient parking on site. These real experiences should take precedence over parking surveys with assumed rates.
- Already King Street (and subsequently side streets) is difficult to park on especially with TAFE and Randwick race day.
- The significant increase in beds, staff, volunteers and visitors will have a major impact on the traffic on King and Dangar Street's. The increase in availability and demand of parking is significant to the bulk and inadequate proposed parking when they currently park on King/ Dangar Street along with on the grass of Montefiore. There will be a significant rise in the number of delivery trucks, ambulances, taxis, cars not including the proposed 35 construction trucks and cranes per day to be on-site and on the streets during construction.

Child Care Centre

- It is proposed to extend the size of the centre from 60 to 80 children. The applicant's report states that the existing 8 parking spaces for 30 children is inadequate (approx 1 per 4) yet states that the proposed 13 spaces will be satisfactory yet adopts the same rate as the existing centre which has acknowledged parking problems.
- The Proposal talks about an increase from 30 to 50 child care places, in fact Moriah College has lodged an amended DA to Randwick Council requesting an increase from an already approved 60 places to 80. The credibility of the concept plan for Building F is already under question.

The proposed development is within the Heritage listed area of North Randwick - the size, proportion, setbacks, height, floor space ratio and insufficient car park dominates and overwhelms the low to medium density heritage conservation area of North Randwick. If the concept plans and DA are approved without substantial reductions, this will set the precedence for future high-density developments in this low-medium density area.

The site is on a water table land where the water level is raised during winter and lowered during summer. It needs to be addressed that building will not impact residents by this.

Thank you for your time. I trust you will make the right decision.

Regards,

Ben Kirkland

From: Bruce Notley-Smith [mailto:bruce@notleysmith.com]
Sent: Monday, 25 October 2010 9:27 AM
To: Ben Kirkland
Subject: RE: Montefiore Objection

Dear Mr. Kirkland,

Thank you for your email.

This development proposal has been declared under Part 3A of NSW planning legislation as a major development, meaning Randwick Council no-longer has the responsibility as consent authority. Council can only submit its views on the development just like any other resident, and final decision will be made by the NSW Minister for Planning, Tony Kelly MP. You should submit this objection to amy.watson@planning.nsw.gov.au

I believe the period for submissions has been extended beyond 22 October.

Kind regards,

Cr. Bruce Notley-Smith
Liberal Candidate for Coogee
Ph. 0412 503 075

From: Ben Kirkland [mailto:Ben.Kirkland@optus.com.au]
Sent: Monday, October 25, 2010 9:07 AM
To: Robert.belleli@randwick.nsw.gov.au; Charles.matthews@randwick.nsw.gov.au;
Alan.white@randwick.nsw.gov.au; mayor@randwick.nsw.gov.au; bruce@notleysmith.com;
tony.bowen@randwick.nsw.gov.au; bradley.Hughes@randwick.nsw.gov.au;
scott.nash@randwick.nsw.gov.au; john.procopiadis@randwick.nsw.gov.au;
anthony.Andrews@randwick.nsw.gov.au; Geoff.stevenson@randwick.nsw.gov.au;
ted.seng@randwick.nsw.gov.au
Subject: Montefiore Objection



Premier & Cabinet

CMU10-24415

25 October 2010

Ms Joan Hansen
hanseneb@bigpond.net.au

Dear Ms Hansen

I write in response to your recent email to the Premier concerning development of Montefiore Aged Care Home.

As the matter you have raised concerns the administration of the Minister for Planning, The Hon Anthony Kelly MLC, your email has been forwarded to the Minister for attention.

You may be sure that your letter will receive close consideration.

Yours sincerely

David Swain
for **Director General**

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From: Eric & Joan Hansen <hanseneb@bigpond.net.au>
To: <plan_comment@planning.nsw.gov.au>
CC: <premier@nsw.gov.au>, <sharon.armstron@lpma.nsw.gov.au>, <coogee@parliam...>
Date: 22/10/2010 2:19 pm
Subject: MP09_0188 & MP10_0044 Expansion of the existing Aged Care Facility at Sir Moses Montefiore Jewish Home

A Submission regarding:

Expansion of Sir Moses Montefiore Jewish Home
100-120 King Street & 30-36 Dangar Street, Randwick
MP_0188 & MP10_0044

I wish to object to the above expansion as it does not meet council guideline in many areas;

1. Density - The FSR is substantially above that permitted i.e. 7276 sqm over.

2. Height - Proposed building F is 10.7m over that permitted in the 2c zone, nor does it meet the set back requirements.

3. Parking - There is inadequate parking on site which means staff, visitors and volunteers are forced to use surrounding residential streets to park.

The architects and management of Montefiore refute this point but as I have friends with a parent residing in the nursing home they advise me that there is

no point to even attempt parking inside as there is no parking available. I have spoken to management at Montefiore about this on many occasions and they either deny or refuse to

answer, this has led me to have a deep distrust of them and no confidence in what they plan for the future of the home and the neighbourhood.

4. Impact on Centennial Apartments - I thankfully do not live in this block of units but feel they have been impacted most severely with many residents unable to use their bedrooms due to the

light and noise pollution from Montefiore. Once again in this area the management of Montefiore have been most cavalier and uncaring of their neighbours.

5 Light & Noise Pollution of the surrounding areas of Montefiore - As mentioned above we have been impacted by the huge amount of light emanating from the building, although management has

promised in the past to address this problem they have done nothing at all, once again the trust of their neighbours has been of no consequence to them.

Noise from staff arriving for early shifts is a problem for many living between bus stops or near entrances.

6. Child Care Centre - It is already over crowded regarding parking. Negotiating King St at pick up or drop off time is dangerous for both drivers and children. Parents are unwilling to find a safe

park at a distance and instead double park or illegally park to access the centre. I believe the soil for this child care centre

should be tested for contaminants considering what the site was
used for prior to it being used as a pre-school.

This is a benchmark building for Randwick North lets do all we can to
get a decent building we can all be proud of instead of this ugly
factory that exists now.

Joan Hansen
9 Mort St
Randwick NSW 2031



Premier & Cabinet

CMU10-24418

25 October 2010

Ms Naomi and Mr Ed Rayner
rayner.naomi@gmail.com

Dear Ms and Mr Rayner

I write in response to your recent email to the Premier concerning development of Montefiore Aged Care Home.

As the matter you have raised concerns the administration of the Minister for Planning, The Hon Anthony Kelly MLC, your email has been forwarded to the Minister for attention.

You may be sure that your letter will receive close consideration.

Yours sincerely

David Swain
for **Director General**

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Amy Watson - SUBMISSION OBJECTING TO SIR MOSES MONTEFIORE JEWISH HOME PROPOSAL (MP10 0044, MP09 0188)

From: Naomi Rayner <rayner.naomi@gmail.com>
To: <plan_comment@planning.nsw.gov.au>
Date: 22/10/2010 2:52 PM
Subject: SUBMISSION OBJECTING TO SIR MOSES MONTEFIORE JEWISH HOME PROPOSAL (MP10 0044, MP09 0188)
CC: <premier@nsw.gov.au>, <sharon.armstrong@lpma.nsw.gov.au>, <coogee@parliament.nsw.gov.au>, <david.shoebridge@parliament.nsw.gov.au>, <john.kaye@parliament.nsw.gov.au>, <cate.faehrmann@parliament.nsw.gov.au>, <brad.hazzard@parliament.nsw.gov.au>, <LOP@parliament.nsw.gov.au>, <general.manager@randwick.nsw.gov.au>, <murray.matson@randwick.nsw.gov.au>, <kiel.smith@randwick.nsw.gov.au>, <margaret.woodsmith@randwick.nsw.gov.au>, Paul Tracey <paul.tracey@randwick.nsw.gov.au>

22 October 2010

SUBMISSION OBJECTING TO SIR MOSES MONTEFIORE JEWISH HOME PROPOSAL (MP10 0044, MP09 0188)

Dear Sir/ Madam

RE: Sir Moses Montefiore Jewish Home (MP10 0044 and MP 09 0188)

My family and I object to the current proposal to significantly enlarge the existing Sir Moses Montefiore Jewish Home ("Proposal"). We would be open to considering a revised Proposal which must be significantly smaller in size and scope to be in keeping with all relevant regulations and the local community.

Our objection to the Proposal is on three grounds:

- (1) **Breach of zoning laws:** The dimensions of the new buildings are substantially above what is permitted according to zoning laws.
- (2) **Materially inconsistent with local community:** The dimensions of the new buildings and the increase in associated commercial traffic are excessive and materially inconsistent with the local community. This further increases existing traffic safety concerns in a family-friendly neighbourhood.
- (3) **The Proposal is misleading and deceptive on various grounds:**
 - a. The Proponent claims to have addressed significant issues raised by local residents but in fact have not.
 - b. The Proponent claims to address a wide community need but in fact is meeting the needs of a small minority.
 - c. The Proponent appears to be motivated by commercial concerns, as the Proposal expands its most profitable aged care facility.

We note that the existing facility was built recently, which begs the question of why this materially larger requirement was not asked for then, or if asked, why it should be approved now.

The fact that the Proponent could not plan ahead for a few short years must bring into doubt its ability to plan for the future. Furthermore, given this evidence of poor planning, there is a risk of future expansion proposals.

1. BREACH OF ZONING LAWS

The Proposal breaches zoning laws in two major respects:

- (a) **Breach of maximum density requirements:** We understand that the floor to space ratio (FSR) is substantially above that permitted, even allowing for the bonus leeway for

developments of this type.

(b) Breach of minimum height requirements: We understand that Building F in the Proposal is ~11 m over that permitted in 2c zoning, equivalent to 3 storeys above permissible.

We understand that there are other technical submissions that provide further details on these and other breaches in the Proposal.

2. MATERIALLY INCONSISTENT WITH LOCAL COMMUNITY

The Proposal is materially inconsistent with the local community on numerous grounds, increasing traffic safety concerns and reducing enjoyment of local amenities:

(a) Increased commercial and retail traffic

Doubling the size of the existing facility, together with introducing new commercial and retail activity into a residential area, will significantly increase the frequency of commercial traffic. This will increase traffic safety concerns in a family-friendly neighbourhood.

For example, there is a small park for children and their parents at the end of Dangar Street, and their safety will be negatively impacted by this increased commercial and retail traffic caused by Montefiore. This would add to the existing concerns of speeding and traffic already on Dangar and King Streets.

(b) Increased non-residential parking on Dangar and King Streets

The Proponent's staff, visitors and volunteers use surrounding streets for non-residential purposes.

For example, on my way to work every morning, I pass the facility and regularly see the Proponent's workers park on Dangar Street. Frankly, I don't blame them - they are not breaking any law, and it is easier to park on the street than to access the facility through the three security boom gates. The Proponent's "staff education and management strategies" to manage this issue sound impressive, but they are not working.

(c) Increased commercial and security lighting

The Proposal is for a 6 storey building with associated commercial and security lighting that is completely out of character in a residential neighbourhood.

(d) Increased security concerns that would not otherwise be needed

Institutions which cater exclusively for people of Jewish faith, including the facility and the two nearby Jewish schools, often require substantially higher security than non-Jewish establishments which offer similar services.

This increases the security presence that would not otherwise be required in an otherwise heterogeneous and diverse community. This negatively impacts on the amenity of existing local residents.

(e) Increased commercial and retail precinct in an otherwise residential area

There is no benefit to local residents of further commercial and retail premises, given the existing of nearby shopping malls (Westfield Bondi Junction, Randwick Junction) and nearby local retail strips. This must only be to the commercial advantage of the Proponent, in terms of the profits from leasing retail and commercial premises.

The additional commercial and retail precinct would be materially out of character with the local residential area. The additional commercial and retail precinct would require additional traffic to service these premises.

The North Randwick area otherwise requires private housing to be in keeping with the area.

3. PROPOSAL IS MISLEADING AND DECEPTIVE

The Proposal is misleading and deceptive on numerous grounds.

(a) Misleading and deceptive as Proponent claims to develop the site to bring about the "best possible results for all stakeholders" (source: Community Update 3)

The Proponent is well aware of the significant, sustained and thought out concerns expressed by local residents. Approving the Proposal would be against the interests of

many residents.

Approving the Proposal would only be in the interests of Proponent and the Jewish community (Proponent caters exclusively for the aged of Jewish heritage). According to the latest ABS statistics, 95% of the Randwick population is not Jewish.

(b) Misleading and deceptive as Proponent claims to be "sensitive and responsive to feedback and comments" (source: Community Update 3)

Proponent claims to be listening to the feedback of Randwick residents, but only addresses the negative feedback it wants to, and only on its terms.

For example, in the latest community update no. 3, Proponent says that it has addressed external lighting, car parking, traffic, and other concerns, but this is not the case as detailed above.

(c) Misleading and deceptive as Montefiore claims to be addressing a need by the community at large, but in effect is only addressing the need of 5% of the population in the area who are of Jewish heritage (source: Community Update 3)

As an Australian of Chinese descent, and an immigrant who left a country that introduced race laws, I am highly sensitive to laws and institutions which emphasise segregation. Nevertheless, I feel it is important to make the points below.

The Proponent is entirely correct that an ageing population is an issue we need to address as a nation, and as local communities. However, the Proponent's conduct is misleading and deceptive as it states the problem of a nation, but is only solving for the few that are of Jewish heritage, with sufficient wealth to pay its charges (see below).

The Proponent claims that a third of its residents are Holocaust survivors, with special needs. The Proponent is employing emotional blackmail by invoking the very real trauma of the Holocaust survivors in their Proposal. The Proponent is being misleading and deceptive by suggesting that this Proposal somehow is unique to addressing these very real needs.

(d) The Proponent wants to expand Randwick campus because it charges the most at Randwick

The Proponent charges its residents at Randwick between \$216-336 per day, much higher than it charges its residents at Woollahra (\$180-231 per day) or at Hunters Hill (\$157-181 per day) (rates are from the Proponent's fee schedule, as at 23 Sept 2011). The commercial advantage to the Proponent to expand Randwick is very clear.

The difference in pricing does not appear to be explainable by the difference in land costs. The median house price for Randwick is \$1.38m, lower than the median house price for Woollahra (\$1.77m) or Hunters Hill (\$1.40m) (data from Australian Property Monitors, as at 23 Sept 2011).

The Proponent is being misleading and deceptive by dressing up their communications to the local residents by advertising their not for profit status and conveniently leaving out any mention of their commercial interests.

The Proponent is expanding the Randwick campus, with government approval, and aged accommodation at this site is expensive to deliver.

Naomi & Ed Rayner
13/69-87 Dangar St
Randwick
Sydney NSW 2031

Tel: 02 9399 9282