

## Preferred Project Report

### Sir Moses Montefiore Jewish Home

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

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



**MONTEFIORE**

**JACKSON TEECE**



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Volume 1 of 2

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# Contents

<b>1.0</b>	<b>Introduction</b>	<b>1</b>
1.1	Structure of this Report	1
<b>2.0</b>	<b>Key Issues and Proponent's Response</b>	<b>2</b>
2.1	Built Form	3
2.2	Compatibility with Desired Future Character	10
2.3	Amenity	12
2.4	Traffic and Parking	16
2.5	Landscaping	19
2.6	SEPP 65	20
2.7	Heritage	23
2.8	Stormwater	24
2.9	Sydney Water Utilities	24
2.10	Errors and Inconsistencies	25
2.11	Other Issues	26
<b>3.0</b>	<b>Concept Plan and Project Application Preferred Project</b>	<b>27</b>
3.1	Key Changes to the Concept Plan	27
3.2	Merits of Key Changes to the Concept Plan	30
3.3	Key Changes to the Project Application	30
3.4	Merits of Key Changes to the Project Application	30
<b>4.0</b>	<b>Final Statement of Commitments</b>	<b>32</b>
<b>5.0</b>	<b>Conclusion</b>	<b>37</b>

## Figures

1	Map showing the location of residents who made a written submission	2
2	Detailed section showing the amenity of the public plaza and colonnade	8
3	View impact (shown in green) from View Point 1a (RL59.4) at 113-123 King Street	13
4	View impact (shown in green) from View Point 1b (RL59.6) at 113-123 King Street	13
5	View impact (shown in green) from View Point 2 (RL58.5) at 125 King Street	14
6	View impact (shown in green) from View Point 3 (RL59.4) at 127 King Street	14
7	Setbacks between the Centennial and the revised Building / Envelope E	16

## Tables

1	FSR and GFA Calculations (Exhibited scheme)	5
2	FSR and GFA Calculations (PPR scheme)	5
3	Height Calculations	7
4	Existing, Exhibited and Proposed Car Parking Provisions	28
5	Existing, Exhibited and Proposed Accommodation Provisions	28

# Contents

## Appendices

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- A**    Response to Submissions Table  
*JBA Planning*
- B**    Architectural Drawings  
*Jackson Teece*
- C**    Landscape Drawings  
*Oculus*
- D**    Visual Impact Analysis  
*Jackson Teece*
- E**    Traffic Assessment Addendum  
*Halcrow MWT*
- F**    SEPP 65 Compliance Statement  
*Jackson Teece*
- G**    Heritage Statement Addendum  
*Clive Lucas Stapleton*
- H**    Stormwater Statement  
*Emerson Associates*
- I**    Utilities Statement Addendum  
*DP Consulting*

## 1.0 Introduction

An Environmental Assessment Report (EAR) for a Concept Plan and Project Application for the Sir Moses Montefiore Jewish Home in Randwick was publicly exhibited for a period of 62 days between 22 September 2010 and 26 November 2010. The Concept Plan and Project Application applications were exhibited twice during this period with four days (23 October 2010 to 26 October 2010) between each exhibition period.

In total 71 submissions (including 6 agency submissions) were received in response to the public exhibition of the Concept Plan and Project Application. The following key issues were identified with the proposal:

- density;
- height;
- overshadowing;
- visual impact / view loss;
- traffic and parking; and
- loss of amenity.

The Department of Planning has also prepared a letter setting out a request for additional information or clarification required prior to final assessment of the project.

The proponent, Sir Moses Montefiore Jewish Home, and its specialist consultant team have reviewed and considered the submissions and, in accordance with clause 75H(6) of the *Environmental Planning and Assessment Act 1979* (EP&A Act), have responded to the issues raised. This Preferred Project Report (PPR) sets out the proponent's response to the issues raised, details several revisions to the Concept Plan and Project Application, and includes a revised and now final Statement of Commitments for which development approval is sought.

This PPR should be read in conjunction with the Concept Plan and Project Application EAR prepared by JBA Urban Planning Consultants Pty Ltd dated September 2010.

### 1.1 Structure of this Report

This report provides a detailed response to the issues raised by the Department of Planning (the Department), and outlines the proposed modifications to the exhibited Concept Plan and Project Application. The table at **Appendix A** provides a response to the issues raised by the Department of Planning and government agencies, as well as the general public during the two exhibition periods. Whilst the responses received from agencies have been addressed individually, the public submissions have been addressed on an issue-by-issue basis. This approach has been adopted due to the significant amount of repetition in the submissions.

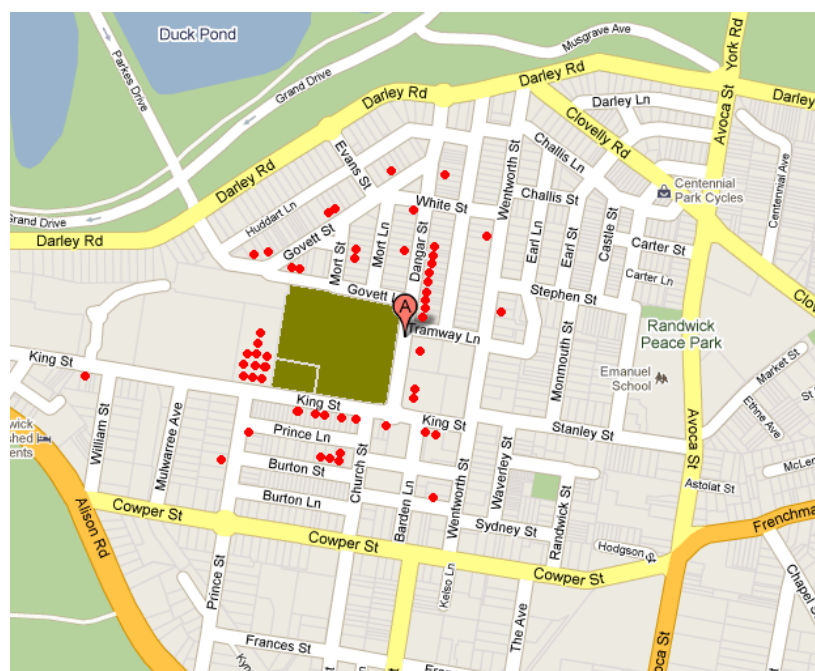
## 2.0 Key Issues and Proponent's Response

Submissions in response to the public exhibition of the Concept Plan and Project Application were received from Randwick Council, State Government agencies and authorities, and the general public. The source of submissions can be summarised as:

- State authorities and agencies - 5;
- Randwick Council – 1; and
- Members of the public – 65.

As many of the responses were based on a pro-forma submission, there is a significant degree of repetition in the issues raised, with inconsistencies and inaccuracies replicated in a number of the submissions. In this regard, it is noted that 33 of the 65 public submissions contain incorrect figures/data and information, indicating that many of the responses were (at least in part) based on inaccurate assumptions about the scale and potential impact of the development. In both this report and the table of responses at **Appendix A**, only those submissions and issues which raised relevant planning considerations have been addressed. We are advised by the Department that the author of submission No. 45 requested that their response not be made public.

The map at **Figure 1** identifies the owners and/or occupants of properties which submitted a response to the proposal. The map shows that many of the submissions were received from residents who do not live in the immediate vicinity of the site. This indicates that the submissions may have been put forward to bolster the number of responses, rather than reflecting the impact that the development may have on their immediate amenity. Additionally, we have noted that there have been multiple submissions from individuals and the same submission issued multiple times under separate authorship. Irrespective of this, this PPR addresses all relevant issues and provides a response to these.



**Figure 1** – Map showing the location of residents who made a written submission

The following section provides a detailed response to the key issues raised by the Department of Planning (the Department) following its detailed review of the submissions. As detailed below, many of the issues relate to the height, bulk and scale of the proposed development.

## 2.1 Built Form

### 2.1.1 Issue

The Department considers that the height of the proposal requires greater justification, particularly in relation to the way that the height and bulk of the proposal are presented to the public domain. In particular, the Department has requested that the Sir Moses Montefiore Jewish Home consider:

- a reduction in height, greater building articulation and greater setbacks along King and Dangar Street to reduce the visual bulk of the proposal;
- the height of Building F, and providing a more sympathetic transitional element with the neighbouring building to the west of the site;
- the levels of Building D which overhang the proposed public space should be further setback to significantly reduce any overhang / encroachment, in order to improve the amenity and usability of the space; and
- elevation plans should be provided that clearly show the presentation of the proposed buildings to King and Dangar Streets.

General concerns surrounding the density and height of the development were also held by Randwick Council and the general public.

The Director City Planning Report CP85/10 from Randwick Council, which forms Council's main submission, noted that the breaches in density and height under the current proposal are at the upper limit that the subject site can tolerate, however did not raise any concerns around the density being excessive. It is noted that this view is contradictory to the issues raised in Council's covering letter, which has labelled the proposal as a gross overdevelopment of the site.

Randwick Council raised additional concerns that the proposed heights represent a significant increase compared to the heights approved under the previously amended Mater Plan 2002. In view of the overall increase in height, Council commented that the proposed development needs to provide a high degree of design and planning at the interface of the proposed development along King Street to achieve the following:

- reinforce King Street with appropriate public domain and landscape treatment that interfaces with the development in an interactive and positive way;
- increased facade treatment to Buildings C, D and E to break the visual bulk and scale of these buildings and provide high quality finishes that will respect the existing and future residential character of the King and Dangar Street streetscapes;
- provide more well defined landscaped view corridors through the site to soften any intrusive built wall-effect along the King Street and Dangar Street fronts and to break the perception of visual bulk and scale;
- increased pedestrian permeability through the site to soften the perception of a wall / gated effect along King and Dangar Streets; and
- a more integrated typology of open space in the subject site that addresses the principal function (e.g. entry forecourt, circulation corridors, walking, sitting, buffer etc) and landscape character (e.g. dense vegetation buffer area, open lawn, informal gardens etc). Additionally, the application has not addressed clearly the pedestrian circulation and linkages between various open areas which should be demonstrated in a schematic form.

## 2.1.2 Proponent's Response

Whilst the proposed Concept Plan will result in a general increase in height and scale across the Montefiore site, this increase is necessary to address the current and growing need for aged care accommodation of all types, whilst generally being compliant with the FSR controls for this form of development and avoiding any significant negative environmental impacts. Notwithstanding this, the proposed modifications to the development as detailed in Section 3, will broadly alleviate the concerns of State agencies and the general public, by ensuring a more appropriate transition between development on the Montefiore site, and the Centennial and Pindare Apartments to the west.

With respect to the 2002 Master Plan, it is noted that this Master Plan has now lapsed, with the proposal representing a new opportunity to review the design of the facility in-line with current social and operational needs. The review and modification of Master Plans is common practice and a five-year timeframe is employed so that Master Plans (and in this case a Concept Plan in lieu of Council's Master Plan requirement) can be adapted as needs change.

### Density

In response to the concerns relating to the density of the development, the FSR figures for the site have been reconsidered and recalculated. It is advised that FSR variations detailed in the exhibited EAR (of 0.38:1 and 0.9:1 / 0.09:1) were the result of typographical errors, and the miscalculation of figures based on Council's definition of GFA, rather than the definition of GFA under the SEPP HSDP.

The revised FSR figures for the exhibited scheme and now revised PPR scheme are outlined in **Table 1** and **Table 2**, respectively below. The figures provide a comparison of the GFA and FSR on the site using the definitions provided in Randwick LEP, as well as the definition under the SEPP HSDP.

The **Table 1** demonstrates that using the definition of GFA provided in SEPP HSDP (which provides exclusions for any floor space below ground level and that is used for service activities provided by the facility), as well as the bonus FSR available, the PPR scheme / proposal is fully compliant in the 2C zone with an FSR of 1.4:1.

In the 2B zone, the original scheme / proposal only exceeds the permissible FSR by 0.11:1 (using the concessional definition of GFA under the SEPP HSDP and the bonus FSR). This exceedence equates to an excess of only 2,106m<sup>2</sup> across the site (using the GFA exclusions available under SEPP HSDP) which is minimal considering the size of the site, and the scale of the development.

**Table 2** (now reflecting the revised scheme under this PPR) indicates that the proposed FSR within the 2B zone exceeds the allowed FSR by some 0.1:1 (about 1,915 m<sup>2</sup>) and is near-compliant, and the 2C zone is within the allowable FSR by 0.02:1 (or by about 204m<sup>2</sup>). In total the development is some 1,711 m<sup>2</sup> in excess of what would be the maximum allowable GFA if this was translated from the FSR control within each zone.



**Table 1 – FSR and GFA Calculations (Exhibited scheme)**

	Area sqm	GFA proposed (using LEP GFA definition)	GFA proposed (using SEPP HSDP definition)	FSR permitted under LEP	FSR proposed (using LEP GFA definition)	FSR permitted with SEPP HSDP 0.5:1 bonus	FSR proposed (using SEPP HSDP GFA exclusions) (extent of exceedence in brackets)
<b>Site</b>	29,353	44,547	38,394	NA	1.52:1	NA	1.31:1
<b>2B Zone</b>	19,146	29,311	24,073	0.65:1	1.53:1	1.15:1	1.26:1 (+0.11:1)
<b>2C Zone</b>	10,207	15,236	14,321	0.9:1	1.49:1	1.4:1	1.4:1 (+0)

**Table 2 – FSR and GFA Calculations (PPR scheme)**

	Area sqm	GFA proposed (using LEP GFA definition)	GFA proposed (using SEPP HSDP definition)	FSR permitted under LEP	FSR proposed (using LEP GFA definition)	FSR permitted with SEPP HSDP 0.5:1 bonus	FSR proposed (using SEPP HSDP GFA exclusions) (extent of exceedence in brackets)
<b>Site</b>	29,353	-	37,968	NA	-	NA	1.29:1
<b>2B Zone</b>	19,146	-	23,895	0.65:1	-	1.15:1	1.25:1 (+0.1:1)
<b>2C Zone</b>	10,207	-	14,073	0.9:1	-	1.4:1	1.38:1 (-0.02:1)

The proposed density enables a better and wider range of services to be provided on the site. Without the use of the bonuses and exclusions available to this form of development, only a further 2,643m<sup>2</sup> of development would be possible. Across the whole site, this would be as low as an additional 0.1:1. Therefore, the lost potential without the application of the relevant provisions of the SEPP HSDP would be in the order of 16,337m<sup>2</sup>, the equivalent of 272 Hostel beds or 272 High Care / Dementia beds.

If Council's controls were adhered to, the outcome would be contrary to the objectives of State Government policy for addressing the long-term provision of housing for Aged Persons or Persons with a Disability, particularly in established areas within existing communities, in close proximity to services. Further, the proposed development does not give rise to any major or significant adverse impacts as a result of the proposed density.

## Height

It is noted that the proposed heights exceed the controls, primarily because there are no height bonuses to correlate with the FSR bonus control when applied in tandem with other numeric controls governing site coverage or landscaping, or provision for other public domain. To meet both the bonus FSR provisions, and to fit within the height controls would unreasonably increase the site coverage of the development, leading to increased building lengths and building massing, and greatly diminished landscaping and open space provision. This has the potential to generate significant design issues, particularly at the site's interface with other land uses. This would also result in a highly inefficient and ineffective development that would not best cater for the functional and operational needs of a facility caring for aged and / or disabled persons across the site. The proposed development fosters a facility with shorter travel distances and horizontal connectivity within a low-mid rise development.

The current scheme is the best fit scenario that takes advantage of the FSR bonuses afforded aged care developments, as well as seeking to meet landscaping and open space provisions, context, and transition of heights (in tandem with the site's topography), and minimised amenity impacts to neighbours.

However, in order to address the concerns raised by the Department and the general public, proposed Envelope F has been deleted, with the floorspace from Envelope F largely incorporated into a revised Envelope E. The modifications, as discussed in Section 3 below, will create a transitional element between development on the Montefiore site, and the adjoining Centennial Apartments to the west.

The revised scheme is considered the most appropriate outcome for the site, meeting existing numeric controls whilst taking advantage of the concessions afforded to aged and disabled care facilities. It also achieves a development that addresses the BCA and relevant Australian Standards whilst meeting contemporary aged care requirements. The proposal also seeks to modulate the built form in order to provide a completed streetscape, whilst making the most efficient and effective use of the land and the available services and infrastructure in the area. The modified proposal also effectively mitigates against amenity impacts to surrounding residents. Wherever possible, the proposal takes advantage of the site's 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 deletion of Envelope F and the subsequent increase to the setbacks on the site's western boundary will provide a more appropriate transitional element to the Centennial Apartments. The stepping back of the upper levels further minimises apparent bulk and height at street frontages.

However, the site's topography has also affected the extent of deviation from the Council controls with man-made cuttings, future as yet unmade basements, and troughs affecting the height of the proposed buildings. It is at these locations centrally within the site that the proposal exceeds the height and wall height controls most significantly. This deviation is most significant at the boundary of the two land use zones, where the building height and wall height controls vary up / down by 2.5m and 3m, respectively. This has its greatest effect along the long section of King Street. At its maximum, the deviations in both the 2B and 2C zones are in the order of two storeys. The location of the maximum deviations is well within the site, at the northern part of Envelope E and the north-western extremity of Envelope E in the 2C zone. These are not visible from the street or other locations outside of the site.

They are also located on the lowest land in the site (around RL40) which is reasonably able to be built upon given the existing drainage requirements of the site. Within the 2B zone, the maximum deviation is at the junction of proposed Building D with existing Building C. This exceedence is at about two storeys given existing excavated land within the central portion of the site for basement parking. This would present as a four storey building from King Street, with this corner sitting over the north-western edge of the public square, set back off King Street.

**Table 3** below sets out the respective building and wall height controls and the deviation of the proposals from these. See also the revised architectural plan set at **Appendix B**.

**Table 3** – Height Calculations

	Max Permissible Building Height (LEP)	Proposal (Concept Plan)	Max Deviation (Concept Plan)	Proposal (Project Application)	Max Deviation (Project Application)
<b>2B Zone</b>	9.5m	17.7m	+ 8.2m	14.8m	+ 5.3m
<b>2C Zone</b>	12m	20.2m	+ 8.2m	N/A	N/A
	Max Permissible Wall Height (LEP)	Proposal (Concept Plan)	Max Deviation (Concept Plan)	Proposal (Project Application)	Max Deviation (Project Application)
<b>2B Zone</b>	7m	Indicative envelopes only	To be determined	14.8m	+ 7.8m
<b>2C Zone</b>	10m	Indicative envelopes only	To be determined	N/A	N/A

## Colonnade

Whilst the proponent has considered the Department's submission and its concerns regarding the amenity and useability of the space, no changes are proposed to the colonnade area fronting the public plaza at King Street. It is considered that the colonnade will provide for a high level of amenity, and contrary to the views of the Department, will make a positive contribution to the useability of the public space.

The merits of the colonnade are set out below, and are illustrated graphically at **Figure 2** - see also the architectural plan set at **Appendix B**. The proposed colonnade with a depth of 4m will provide:

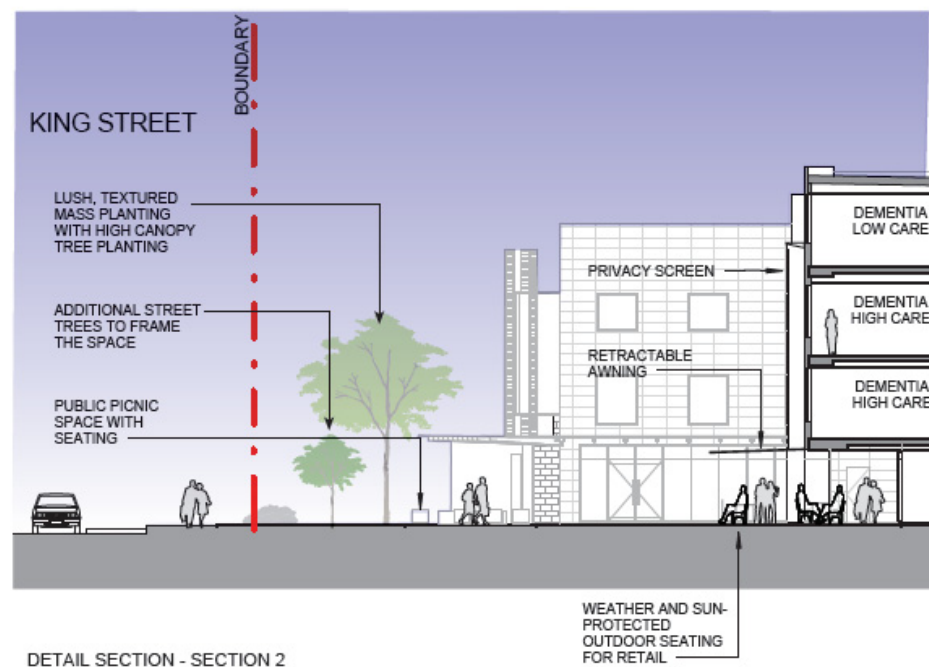
- ample circulation space, particularly considering users may be walking abreast of each other, supporting elderly or frail patrons;
- adequate shade and wet weather protection;
- increased legibility by contrasting with the adjacent ground level facade treatments and space functions;
- a comfortable depth for a cafe table and chairs plus weather protected circulation space;
- a generous edge to the public open space;
- a feeling of enclosure, rather than an exposed area as would be the case with a more narrow colonnade or fixed glass awning;
- adequate space for wheelchair or assisted access; and
- enhanced security for the site by activating the King Street frontage.

The proposed setback at the colonnade is generous, and well in excess of Council's controls. Whilst the required setback along King Street set is 10m, the proposed King Street set back at the public square is increased by an additional 10m, providing a total set back of 20m. Together with the colonnade, a total set back of 24m is provided to the retail frontage. A lesser colonnade or 'overhang' would reduce this proposed set back at the public space.

Finally, the proposed colonnade is 4m in depth, providing a cross sectional proportion that is wider than it is high. A shallower colonnade would appear and feel out of proportion, confined and would expose the undercover area to the weather.

In summary, a narrower colonnade would be less functional, and would not facilitate multiple uses. Replacement of the colonnade with a fixed awning would create a space that is more exposed, and would also negate the ability to use an extendable awning that will increase amenity and the outdoor seating capacity at the edge of the public space.

If Building D were to be setback to reduce the extent of the 'overhang', this would lead to a loss of high and low care dementia accommodation, and would compromise the efficiency of the Home, as well as the amenity of the internal courtyard. It would also reduce passive surveillance over the public plaza. If the retail space were brought forward to eliminate the colonnade, this would create approximately 110m<sup>2</sup> of additional retail space. This would lead to a non-compliance with Council's controls for the site, and would be in excess of what the site and surrounding area can support.



**Figure 2** – Detailed section showing the amenity of the public plaza and colonnade

### Interface with Surrounding Streets

In response to the concerns of the Department and Council relating to the height of the development and its interface with the public domain, it is considered that through good urban design, and by appropriately treating the public edge of the site, the impact of the increased height can be mitigated. It is considered that the proposal will activate the King Street frontage, providing for greater interaction and passive security between the street and the Montefiore Home. In part, this is achieved through the public space and colonnade, the merits of which have been described above.

Suggestions that the buildings should be broken down to provide view corridors through the site are unfeasible due to the operational requirements of the aged care facility. The removal of floor space to create view corridors would also require additional height in order to maintain operational GFA and hence FSR across the site. The quality of views that could be achieved perpendicular to King Street is also questionable, with any view corridors created simply opening views to within the Montefiore site, rather than significant views across and beyond the site to the north.

The apparent massing of the development is mitigated by the design of the buildings, as demonstrated by the exhibited plans, and the additional elevations that have been prepared by Jackson Teece (refer to **Appendix B**) in response to the Department's submission.

The facades of Building C and proposed Building D are refined and articulated, using a range of finishes and materials to create visual interest, which break down the facade and reduce the apparent bulk of the buildings. Building E will be designed using a similar approach at the detailed design stage, to emphasise a vertical bay articulation in the design, rather than a horizontal emphasis.

Council's request to permit public access across the site is inappropriate. The site is privately owned, and is not currently used as a public thoroughfare. Similarly, it is not intended as a public thoroughfare in the future. The fences surrounding the site are required for security purposes, as well as to prevent frail residents, particularly those suffering from dementia, from leaving the site unattended. Additionally, Council's concerns regarding the design and use of open space areas are unfounded. The different open spaces are identified on the landscape plans, and are considered appropriate given the use of the site. The internal courtyards are intended for passive recreation, with landscaped areas around the perimeter of the site containing informal plantings that are intended to screen the development from the street and common property boundaries. Circulation paths and ramps within the outdoor spaces are shown on the submitted landscape plans. The additional landscaping proposed on the site's western boundary (refer to Section 3 below and **Appendix B** and **C**) will further enhance the amenity of residents within the Centennial Apartments.

### Nexus between the Needs for Aged Care Facilities and the Scale of Development

The scale and built form of the development is based on the needs of the Montefiore home, and the specific needs of aged care facilities, and the increased demand for aged care places in existing built-up areas of inner Sydney. The development needs to be considered within the context of the need for this form of development, and the public benefit it will provide. In summary:

- the proposed development is not profit driven, rather it is driven by the provision of aged care services, and the need to protect the value of the land and the desire to make the most efficient and economic use of the site (as espoused by the Objects of the Environmental Planning and Assessment Act);
- the range of services available and the care model provided is proportionate to the need and demand for this form of development, particularly in this locality;
- the proposed density on the site will enable a better and wider range of services to be provided;
- the development enables a significant contribution to the concept of aging in place - a key element of NSW Government planning and provision of aged care services into the future;
- it is a valid use of land given the existing development, its built form context and the demographic and social context of the site;
- if the proposed development does not proceed, there are no appropriate alternative sites in the locality that present the same cost-effective opportunities; and
- the proposal represents a genuine attempt to plan for the future and has been designed to satisfy existing and future demand for aged care of all types, whether high level dementia care, lower level care, and self care. The proposal allows for a transition of modes of care from self care to high care for individuals or couples over their life cycle.

This is supported by the Draft East Subregional Strategy which 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, particularly as noted above across all modes of care within a single development.

## 2.2 Compatibility with Desired Future Character

### 2.2.1 Issue

The submission received from ABC Planning notes that the assessment of the Land and Environment Court Planning Principles for Height, Bulk and Scale only assesses two of the six questions contained in the Principle.

### 2.2.2 Proponent's Response

The omission of the remaining four principles was an oversight. The six principles are addressed in detail below.

**Are the impacts consistent with the impacts that may be reasonably expected under the controls?**

The Concept Plan development is consistent with Randwick Multi Unit Housing DCP controls and SEPP 65 Residential Flat Design Code (RFDC) Rules of Thumb that aim to ensure reasonable solar access to, and privacy for, neighbouring dwellings. The minimum requirements for solar access to buildings to the south and west of the site are achieved. The modifications to the proposal as outlined in Section 3, including deletion of Envelope F and the redesign of proposed Envelope E, will further ameliorate any overshadowing impacts on apartments to the west, by increasing the setback between the Home and the Centennial Apartments.

The provision of ample building separation to the north, east and south, combined with differences in floor levels will ensure privacy both within and adjacent to the Montefiore Jewish Home site. The proposed deletion of Envelope F, and the modification to Envelope E (as detailed Section 3) will enhance privacy for adjoining properties to the west by providing increased setbacks, and a greater transitional element at the boundary of the two sites. The impacts are consistent with what would be expected of a complying scheme and (as noted above), the greatest non-compliances (with height) are to be found central to the site and do not impact adversely on neighbouring properties. The impact of view loss on properties to the south-east of the site are addressed in Section 2.3 below, the visual analysis indicates that the proposal will have a minimal impact on views.

**How does the proposal's height and bulk relate to the height and bulk desired under the relevant controls?**

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 (using the definition of GFA provided under the HSDP SEPP and the bonus FSR for aged care accommodation). The Concept Plan is compliant in the 2C zone, and seeks a variation of only 0.1:1 in the 2B zone.

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

Whilst the development exceeds the height permissible on the site, given the minimisation of apparent bulk and height at the King and Dangar Street frontages discussed above and the creation of a transitional element between the site and the Centennial Apartments to the west, the proposal is not inconsistent with the desired future character with regard to apparent building bulk. The minor extent of the FSR exceedence (0.1:1 in the 2B zone) further legitimises the scale of the development.

### Does the area have a predominant existing character and are the planning controls likely to maintain it?

There is no consistent built form in the locality. The site is surrounded by a range of detached, semi-detached and medium-high density residential flat buildings as well as a number of non-residential land uses. These non-residential uses include the bus depot, as well as TAFE and UNSW campuses. Due to this range of uses, there is not considered to be any consistent character or any uniformity to development in the surrounding locality.

The local planning controls are more likely to result in a low-rise development more akin to lower density semi-detached residential development to the north of the site than that found to the west and south-east of the site which is of a higher density and a mix of uses. The State-based planning controls are more likely to permit and promote a flexible approach to development outcomes consistent with the lack of uniformity to bulk, scale and height in the precinct within which Montefiore sits.

### Does the proposal fit into the existing character of the area?

As discussed above, there is no consistency or uniformity to the local built form. As a result, the proposal is considered to be compatible with the existing character of the area as it is consistent with the mix and form of residential and non-residential uses in the locality. The Department of Planning has previously formally formed this view with respect to the issue of a Site Compatibility Certificate to the former (exhibited) scheme subject of this proposal.

### Is the proposal consistent with the bulk and character intended by the planning controls?

As outlined above, the proposed exceedence of the FSR is minimal (0.1:1) within the 2B zone only, representing an additional 1,711m<sup>2</sup> of GFA across the whole site, above what is permitted, and is therefore considered consistent with the bulk intended by the planning controls (using the GFA exclusions available under SEPP HSDP). The proposed deviations from the height controls result from the FSR permissible on the site and a consistent site coverage and open space provision, with no height bonuses available under the HSDP SEPP to accompany the FSR bonuses.

While the previously approved masterplan for the site has now lapsed, it is referred to as a guide as it (until lapsing) represented Council's position regarding the development of the site. 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.



### Does the proposal look appropriate in its context?

As noted above, there is no uniformity to the appearance of development in the surrounding locality. The proposed building reinforces and maintains the character of the residential developments along Dangar and King Streets by framing the street, and providing a domestic edge, with the public plaza at the corner of King and Dangar Streets designed to address the existing retail premises on the adjacent corner whilst respecting the residential nature of Dangar Street.

The proposed development is consistent with the development to the west, acting as a transition between the more industrial / educational / institutional scaled buildings and the medium density housing forms to the west.

The character of Govett Lane to the north will remain unchanged.

## 2.3 Amenity

### 2.3.1 Issue

The Department raised concerns surrounding the potential amenity impacts of the childcare centre's play area on the adjoining apartment buildings to the west of the site. The Department has requested that the configuration, layout and location of the space be reconsidered to mitigate against any potential impacts.

The Department has also requested that a full assessment be carried out to demonstrate any view loss impacts to the apartment buildings to the south-east of the site, on views across the site to the north-west and beyond to the City. These views were echoed by Randwick Council, which also raised concerns surrounding the impacts of view loss as well as light spill.

The submissions from the public have raised a number of concerns surrounding the potential amenity impacts of the proposed development. In particular, the public considered that the proposal would have negative impacts with regards to:

- solar access and overshadowing, with claims that solar access to units in the Centennial Apartments would be reduced to less than 3 hours a day;
- privacy, particularly for residents in the Centennial Apartments; and
- visual impact and view loss, for residents of the Centennial Apartments, as well as residents in surrounding streets.

### 2.3.2 Proponent's Response

In general, the amenity impacts of the development are considered acceptable, and have been appropriately mitigated against where there is potential for negative impacts to arise. Notwithstanding this, the proposal has been revised (refer to Section 3 below) to address concerns raised by the Department, Council and the general public. Further consideration of the issues raised during the exhibition period is provided below.

#### Childcare Centre Play Area

In response to the Department's concern regarding the potential amenity impacts of the proposed childcare centre play area on adjoining residential apartments, the child care centre and play area have been redesigned. As detailed in Section 3, and the amended plans prepared by Jackson Teece (refer to **Appendix B**) the childcare centre and play area has been redesigned to provide greater amenity for residents in the adjoining Centennial Apartments. Modifications to the childcare centre and play area include:



- the play area has been redesigned to minimise the amount of external play space fronting the neighbouring properties. This will reduce any visual and acoustic impacts emanating from the childcare centre;
- provision of a 3m wide landscape buffer between the childcare centre and the Centennial Apartment to provide visual and acoustic privacy (in tandem with the proposed 1.8m high wall); and
- a green roof has been provided on the childcare centre, ensuring a pleasant outlook for residents of the Centennial.

## Visual Impact and View Loss

A visual impact analysis has been prepared by Jackson Teece (refer to **Appendix D**) to address the Department's concerns relating to view loss impacts to the apartment buildings to the south-east of the site.

For the purposes of the assessment, the CBD skyline is taken to extend between World Square and Governor Philip Tower. Potential visual impacts and view loss have been determined by drawing sight lines from the CBD to the apartments which lie to the south-east of the Montefiore site. The site lines from the CBD have been overlaid on the detailed plan to illustrate the affected face(s) of surrounding buildings, located within the view impact zone (determined to be between RL56.45 and RL58.53). These two heights represent the highest ridge of the existing Montefiore development and the highest point of the proposed development. The analysis takes into account standing views only, as seated views are limited by opaque balcony balustrades, and the absence of any floor to ceiling windows. **Figures 3-6** illustrate the impact of the proposed development on existing CBD views from the three nominated view points. The area shaded green shows the silhouette of the impact of the proposed development, that is the potential view lost.



VP1.1: VIEW IMPACT RL 59.4m

**Figure 3** – View impact (show in green) from View Point 1a (RL59.4) at 113-123 King Street



VP1.2: VIEW IMPACT RL56.6m

**Figure 4** – View impact (show in green) from View Point 1b (RL59.6) at 113-123 King Street



VP2: VIEW IMPACT RL 58.5m

**Figure 5** – View impact (shown in green) from View Point 2 (RL58.5) at 125 King Street



VP3: VIEW IMPACT RL59.4m

**Figure 6** – View impact (shown in green) from View Point 3 (RL59.4) at 127 King Street

The analysis shows that generally, existing views to the City skyline will not be affected by the proposal. The most considerable impact on views is at RL59.6 at 113-123 King Street, where the lower portion of the skyline will be obscured. However, landmark buildings such as the Centre point Tower will still be visible above the Montefiore development. The visual impacts of the proposal are considered minimal and acceptable, given the few apartments affected, and the degree of distant CBD views retained, or at worst marginally affected.

In relation to views from the Centennial Apartments, there are no significant views from the Centennial Apartments over the Montefiore site. As described in the exhibited EAR, what can be seen from the Centennial Apartments cannot be described as a “view”, rather it is considered to be an “outlook”. The retention of views and outlooks is not retained as a right, and given that the proposal is consistent with local and State Government planning and strategic objectives, as well as the desired future character of the site, it is reasonable that the outlook from these apartments (at 90-98 King Street) be impacted upon in some form or potentially be removed. Whilst the deletion of Envelope F and the redesign of Envelope E will still lead to the loss of “outlook” from the Centennial Apartments across the site, the proposed modifications will provide a more appropriate transitional element, with greater setbacks and landscaping effectively mitigating against the impact of the proposal and achieving a more pleasant outlook for residents of the Centennial Apartments than in the previous scheme.

The rationale for removing this view is further enhanced by the fact that the revised Envelope E adequately preserves solar access and visual privacy to the Centennial and Pindare Apartments. In this regard, the visual impact of the redesigned Envelope E will be mitigated by the generous setback provided, as well as other privacy measures that will be implemented at Project Application or DA stage including the offsetting of windows, landscaping and screening. See further below under 'Privacy'.

## Overshadowing

Whilst the originally proposed Envelope F did not give rise to any significant overshadowing impacts with the levels of solar access provided to the adjoining apartments meeting the requirements of the SEPP 65 Residential Flat Design Code (RFDC) and its Rules-of-Thumb, the deletion of Envelope F and the redesign of Envelope E will further mitigate against any potential overshadowing impacts. As demonstrated in the revised shadow diagrams prepared by Jackson Teece (refer to **Appendix B**) and, in particular the elevation study of Centennial between 9am and 9:30am on the winter solstice, the revised Envelope E will not have any significant impacts on solar access. The elevations show, that whilst at 9am the proposal has an additional overshadowing impact on apartments at the ground floor only of the Centennial, by 9:11am, the proposal will not restrict solar access onto windows and into the living rooms of any apartments. As such, the proposal will not prevent apartments in the Centennial from achieving minimum solar access requirements under the RFDC as well over 2 hours of solar access and just under 3 hours of solar access can be achieved to the only affected dwelling on the ground floor of this building. It should be noted that any other impacts on solar access are the result of the Centennial Apartment building overshadowing itself. The existing inefficiencies of the Centennial Apartments (many of which relate to their siting, orientation and single aspect) cannot be rectified by the proposal. The development should not be inhibited, or limited by these design faults.

Submissions which questioned the validity of the shadow diagrams are also nullified. The shadow diagrams have been prepared using computer modelling by a qualified and registered consultant. The use of computer modelling is standard practice, and is accepted as an accurate technique for modelling overshadowing impacts. As such, the shadow diagrams are considered an accurate reflection of solar access for both the existing and proposed development on the site.

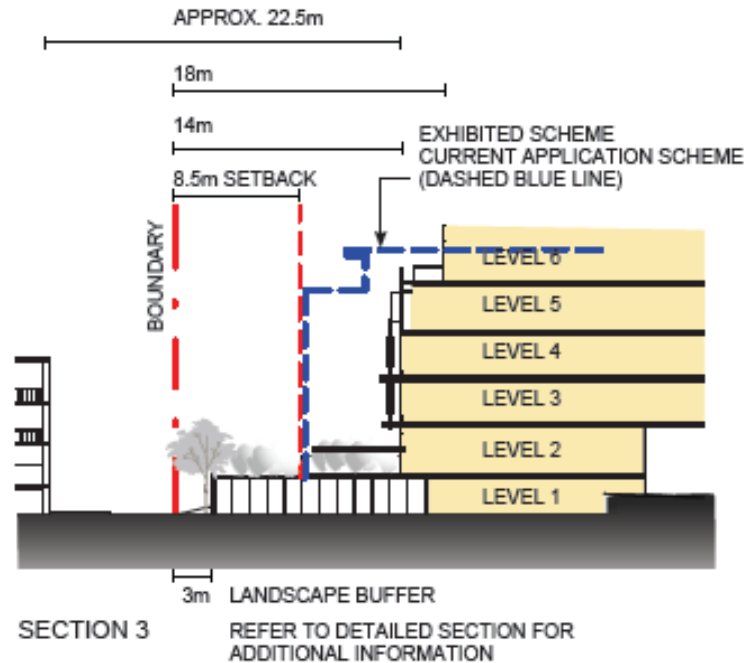
## Privacy

In order to address privacy impacts, and provide a more appropriate transitional element between the proposed development and the Centennial Apartments, Envelope F has been deleted, with much of Envelope F being incorporated into a revised Envelope E. The resulting setbacks are shown at **Figure 7**. The setback has increased to some 22.5m between the self-care residential levels and the Centennial Apartments, alleviating any privacy concerns. Further, the previous setback from the boundary of 8.5m has been increased to 14m to the substantive face of the building. The proposed setback is considered generous, exceeding Council's controls, which require a 5m side setback and the RFDC Rules-of-Thumb, which require an 18m separation distance between buildings of five to eight storeys. As discussed in Section 3, a number of additional mitigation measures are proposed to eliminate privacy concerns, including:

- provision of a 3m wide planted buffer zone between the western boundary and the relocated child care centre;
- the addition of a 'green roof' to the childcare centre, providing for an increased landscape screen edge to the high care and self care building above the childcare centre and reduced perception of a hard edge;
- replacing the balconies on the high care floors to generously proportioned non-accessible planter boxes;
- providing balustrades that are designed to limit views down, but still allow for horizontal views and light penetration for the proposed building; and
- windows that are screened from the western sun. The screens are designed to limit perpendicular views out and facilitate the southern and northern outlook.

This proposed separation distance is well in excess of the relevant controls and rules-of-thumb, and together with the measures listed above, will mitigate against any potential privacy impacts.

In regards to the privacy of other dwellings in the locality, Building D is some 33m from the nearest dwellings to the east of Dangar Street. Similarly, Building E lies approximately 35m from residences on the southern side of King Street. It is considered that these separation distances will adequately mitigate against any potential privacy impacts.



**Figure 7** – Setbacks between the Centennial and the revised Building / Envelope E

## Light and Noise Pollution

Issues surrounding light and noise pollution can be addressed through the appropriation operation and management of the facility. These are issues that have been raised previously and are being addressed by Montefiore. An external lighting audit was undertaken, which has identified some areas of light spill. Some of these areas will be addressed with shades to be affixed to specific lamps; others are a function of the Building Management System (BMS) which is undergoing a system-wide upgrade, which should address the remaining areas.

## 2.4 Traffic and Parking

### 2.4.1 Issue

With respect to Traffic and Parking, the Department has proposed that a dedicated off street pick-up / drop-off area be provided for the childcare centre. The Department also raised concerns surrounding the number of children the childcare centre will cater for (highlighting inconsistencies between the exhibited EAR and the number of children the centre is licensed to cater for) and the subsequent impacts on on-site car parking.

Whilst the RTA did not raise any concerns surrounding the proposed parking provisions, and notably Transport NSW requested that the proposed parking rates be reconsidered and potentially reduced to discourage private vehicle usage, Randwick Council raised several concerns relating to car parking. In summary:

- the existing child care is approved for 60 children and licensed for 80 children (rather than 50 as outlined in the EAR). The car parking and traffic analysis provided with respect to existing and future needs of the childcare centre should be reviewed to ensure that the demand for car parking, traffic and drop off / pick up are based on the higher number of children;

- an appropriate commitment should be made by the proponent to apply more stringent management initiatives to ensure that all staff driving to work park their cars on-site;
- the implications of any weekend peak traffic when family members are likely to pay visit; and
- the report should indicate whether vehicles would queue and park on public roads as a result of the intensified operation.

The public submissions mirrored these concerns, with the adequacy of the proposed car parking rates, and the subsequent impacts on traffic and on-street parking brought into question. The full range of traffic and transport issues is also addressed in the Response to Submissions table at **Appendix A**.

## 2.4.2 Proponent's Response

Halcrow MWT has prepared a response to address the issues raised by the Department, Council, the RTA, Transport NSW and the State Transit Authority in their submissions. Halcrow's response is provided at **Appendix E**. Key issues are summarised below.

### Department of Planning

The Traffic Report prepared in 2010 assessed an increase of 30 children at the centre, from the previously reputed attendance of 20 children. Based on the provision of a 50 place child care centre, RTA trip rate were used to anticipate trip generation rates. The assessment found that the child care proposal would generate an additional 24 trips during the morning peak period and 21 trips during the evening peak period.

However, it is now known that the existing childcare centre has temporary approval for 80 children and has been operating at this level prior to the recent extension of this more recent temporary approval. As such, the traffic surveys undertaken by Halcrow in 2009 as part of the Traffic Report prepared for the Concept Plan included the operation of an 80 place childcare centre. As there will be no net increase in childcare places on the site, there will be no net change in childcare assumed traffic generation between the existing and proposed (PPR) scheme.

The existing child care centre which accommodates 80 children and 8 staff, relies on a total of six on-street short stay (15 minute) spaces for drop off / pick up purposes, one of which is across the access to the centre's existing car park which contains six spaces. The on-site parking is typically utilised by staff. The proposal provides a total of 20 on-site parking spaces for the proposed 80 place childcare centre, comprising 14 drop off / pick up spaces within a dedicated parking area and six spaces for childcare centre staff.

The Preferred Project seeks to increase the total number of parking spaces provided for the existing childcare centre use (in line with RTA and Council requirements) and provide these spaces on site, thereby removing the need for child care drop off / pick up to occur on street. As such the Preferred Project proposal would substantially improve vehicular access and parking arrangements for the childcare centre.

### Randwick Council

Council's concerns relating to the childcare centre have been addressed above. In relation to the improving access for on-site parking, the Montefiore Home management has implemented measures to improve access to the on-site car parks, namely a greater distribution of swipe cards to employees and volunteers. In addition, less frequent visiting volunteers are buzzed through at reception with security being advised in advance of their scheduled (rostered) arrival.

In relation to on-street parking, current council on-street parking regulations allow all users, including staff and visitor to the Home, to use the on-street parking. It is not the responsibility of the Home to impose regulations on on-street parking, as it has no jurisdiction over these spaces. However, Montefiore will continue to encourage staff to park on-site as it is understood to be a concern for its neighbours. It is also noted that the lack of on-street parking is a district-wide problem. A number of different uses compete for these spaces on any given day, including the TAFE, UNSW, Randwick Racecourse, Montefiore, and the neighbouring residents, most of whose homes are of an age which do not have off-street parking.

In considering weekend traffic, Halcrow has noted that generally, weekend traffic does not peak significantly like weekday traffic. Weekend traffic, including family visitors, tends to be spread throughout the day. Conversely, weekday traffic including visits from family tends to accord with general morning and evening peak traffic periods. Therefore, with a view to assessing peak conditions on the local road network as a whole, weekend traffic would not present the busiest traffic conditions.

With regard to queuing on street, the busiest forecast weekday period for arrivals is the morning peak hour, during which 79 vehicles would access the site, via the entry-only Dangar Street access and the two-way King Street access. On average this equates to 40 vehicles per hour or one vehicle every 1.5mins. On this basis, any further investigation of the entry accesses and the potential for queuing is unwarranted.

### Roads and Traffic Authority

In accordance with the RTA's submissions, the layout of the proposed car parking areas associated with the subject development accords with the relevant standards including AS2890.1-2004.

### Transport NSW

Halcrow's Traffic Report dated 1 September 2010 included a comprehensive 'demand based' parking assessment that used site specific data (namely a July 2009 Staff Travel Questionnaire Survey) to calculate an appropriate level of parking for the development. This methodology was primarily undertaken to determine the existing demand for the various travel modes used to access the site. The survey was also used to determine the level of current use of both on site and off parking by Montefiore.

In recognition of the complexity of this particular site in terms of the demand for on-street parking, Montefiore undertook this additional study to confirm that a sufficient on-site provision would be based on actual demand rather than theoretical numbers. The Travel Questionnaire Survey collected data on the use of public transport, carpooling, and cycling as well, and determined the parking numbers in consideration of all forms of transport used by staff and visitors. A Green Travel Plan is also included in the proposal.

Halcrow has confirmed that the proposed 217 parking spaces achieves the appropriate balance with regard to local planning controls, RTA guidelines, and the maintenance of appropriate levels of on-street parking for neighbouring properties and other uses in the area.

As stated in Halcrow's originally submitted Traffic Report, the development and implementation of a Green Travel Plan would be part of the proposed development. It is proposed that a Green Travel Plan be prepared prior to the operation of any new development on the Montefiore site.

The main objective of the Green Travel Plan is to implement measures which encourage and enable a reduction in the percentage of private motor vehicle trips made to and from the site in favour of public transport, walking and cycling transport modes. A Green Travel Plan for the site would include measures to:

- increase awareness and access to public transport services,
- promote car sharing arrangement; and
- discourage on street parking arrangements.

In conjunction with the Green Travel Plan, the proposed parking allocation is based on demand as discussed above, to achieve a balanced outcome for the development, the surrounding community and broader transport planning principles.

The provision of facilities for cyclists is also addressed as part of the PPR. The end of trip facilities for the development will be augmented within Building A where existing shower, locker and bike parking facilities are located. It is felt that a singular consolidated position of the facilities (particularly for staff) will better promote alternative travel options and allow for ease of showering and changing close to the central workplaces on the site.

### State Transit Authority

In relation to the issues raised regarding the amenity impacts of the bus depot, it is proposed to address these concerns at the detailed design phase for Envelope E and further at its Construction Certificate stage. Additionally, there is no expected light spill issue from the bus depot into / onto the Montefiore site given the distance from the bus depot and the residential development between the two sites. Acoustic treatment of the facade of Envelope E and other potentially affected Buildings on the site will be considered at the appropriate stage of development.

In relation to the impact of construction activities on STA bus services, a Construction Traffic Management Plan (CTMP) will be prepared prior to issue of relevant Construction Certificates and as appropriate, comments on the Draft CTMP will be sought from the STA. Section 5 of the Halcrow original Traffic Report sets out the general principles that would be incorporated in the CTMP, including how the proximity of the site to the Bus Depot would be managed.

## 2.5 Landscaping

### 2.5.1 Issue

The submission prepared by ABC Planning requested that the landscape figures be recalculated, highlighting a substantial numerical deficiency of deep soil planting.

### 2.5.2 Proponent's Response

Under clause 20E of Council's LEP, development within 2B and 2C zones must provide a minimum of 50% of the total site area as landscaped area. Landscaped areas over podiums or excavated basement areas must not exceed 50% of the landscaped area requirements.

As the total site area is 29,353m<sup>2</sup>, a minimum of 14,677m<sup>2</sup> of landscaped area is required. Some 14,964m<sup>2</sup> of landscaped area is provided, representing 51 % of the site area.



Under the LEP, *landscaped area* means the part of a site area that is used, or capable of being used, for outdoor recreation or garden areas (such as lawns, gardens, unroofed swimming pools, clothes drying areas, barbecue areas, footpaths and the like) and includes landscaped podium areas and water tanks located at ground level. It does not include areas used for parking, driveways, balconies, rooftop gardens or areas used for garbage or recycling material storage or sorting.

No more than 50% of the landscaped area can be over podiums or excavated basement areas. Therefore a minimum 50% of the landscaped area must be any form of landscaping other than that over podiums or excavated basements. This is at least 7,338.5m<sup>2</sup>. As only 4,039m<sup>2</sup> (or 27% of the landscaped area) is provided over podiums or excavated basements, a total of 10,925m<sup>2</sup> of deep soil landscaped area is provided. With 73% of all landscaped area being deep soil landscaping, Council's requirements are adequately satisfied.

## 2.6 SEPP 65

### 2.6.1 Issue

ABC Planning raised the concern, that because Concept Plan approval is sought for the proposed residential apartments in Envelope F, an assessment should be completed against the ten principles of SEPP 65. ABC Planning has also noted that the SEPP 65 design principles should be considered for the other buildings that form the subject of the Project Applications.

### 2.6.2 Proponent's Response

Whilst Envelope F has now been deleted, a summary of the assessment of the revised Envelope E (which will now house the self-contained apartments) against the SEPP 65 RFDC Rules of Thumb is provided below in response to ABC Planning's submission. The fuller assessment is at **Appendix F** of this PPR.

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 E, floor layouts for these units are not yet designed and will be more appropriately included in future Project or Development Application for that building. Notwithstanding this, it is noted that the Residential Flat Design Code states that *'many of its recommendations may be relevant to other types of residential development'*. As a result, the Envelope E has been assessed against the provisions of SEPP 65.

The SEPP 65 Building Configuration objectives have been applied to achieve design excellence for the indicative layouts of the self care apartments in Envelope / Building E (refer to plans at **Appendix F**). Spatially, the apartments are functional and well organised, with all living rooms and the majority of bedrooms having access to recessed external balconies for private open space. The proposed balconies will be functional, spacious, well proportioned and designed to promote outdoor use. They will include privacy and climate control screens as necessary.

Internally, the apartment layouts are designed to achieve a high standard of residential amenity. All apartments are larger than the minimum areas nominated in SEPP 65.



They proposed layouts allow for a variety of furniture configurations, provide generous ceiling heights, have efficient internal circulation planning and maximise the number of habitable rooms with windows to facilitate natural ventilation and daylight access.

The indicative layouts have also been used to assess the self-care apartments against the SEPP 65 Building Design guidelines. In summary, the indicative design is able to achieve compliance with the requirements for:

- balconies;
- ceiling heights;
- internal circulation; and
- storage.

The self-care apartments are also able to meet building amenity criteria with regards to:

- acoustic privacy;
- daylight access; and
- natural ventilation.

However, it is noted that these outcomes are based on indicative floor plans and layouts, and will be subject to design refinement at Development Application (DA) stage. Any future applications would be subject to a review of SEPP 65 at detailed design stage.

The ten architectural design principles of SEPP 65 have also been reconsidered, and are addressed below.

## Context

As discussed previously in this report, there is no consistent built form in the locality, with the site surrounded by a range of non-residential and residential land uses of varying densities. As such, the proposal is considered appropriate for its context. Further, the proposed development is consistent with the existing use of the site, providing a transition to the more industrial / educational / institutional scaled buildings further to the west of the medium density housing.

Whilst several submissions call for the landscaping and open space which currently dominates the site to be maintained, 'large expanses of open space and landscaping' are not consistent with the character of this high modified urban area.

## Scale

Given the absence of a consistent built form in the area, the need for aged care facilities, the minor exceedence of the FSR controls and the absence of negative amenity impacts, the proposed scale is considered appropriate. As detailed in Section 2.1.2, using the definition of GFA provided in SEPP HSDP and the FSR bonus available for this form of development, the proposal only exceeds the permissible FSR by 0.1:1 in the 2B zone, equating to an excess of 1,711m<sup>2</sup> across the site, when balanced with the compliance within the 2C zone. The deviations from the height controls are the result of inconsistencies between the provision of FSR and height incentives, with no height bonuses provided to accommodate the increased FSR permitted for this form of development.

The proposal complements the varying scale of the adjacent sites as:

- the Govett Lane streetscape remains unchanged;
- the Dangar Street precinct responds to the larger residential forms on the street at the southern end of the street, and links with the existing scale of the aged care facility; and
- the King Street precinct has been addressed by stepping the form of the building to reduce the scale of the southern façade in sympathy with the residences to the south whilst transitioning from the built form to the more developed western properties.

### Built Form

There is no consistent built form in the locality. The built form is reflective of the proposed use, and is necessary to ensure that the aged care facility functions efficiently. It is considered that the built form, in conjunction with the proposed landscaping, relates appropriately to the residential and retail uses in the area.

The mass and scale of the proposal relates to the surrounding context. Building heights at the periphery of the site vary, and are stepped in plan and elevation to provide a transition to surrounding building heights. The stepping of the form in conjunction with the landscaped buffers addresses the residential nature of the streets.

The vista down Church Street is considered a more retail / public place and the built form steps back and provides a public plaza associated with a retail precinct that reflects the existing retail to the south.

Within the site the form creates landscaped internal courtyards, providing natural light and suitable outlook for the residential accommodation and a variety of places for residents.

### Density

As discussed above in addressing the scale of the development, given the lack of a consistent built form in the area, the need for aged care facilities, the minor extent of the FSR breaches and the absence of negative amenity impacts, the proposed scale is considered appropriate.

### Resource, Water and Energy Efficiency

The design of the site, landscaping treatment and buildings will be guided by best practice standards in ESD, with the minimisation of energy consumption being integral to the design intent of the buildings. Existing ESD initiatives including the re-use of rainwater on the site will be continued and augmented as part of the proposal.

As detailed above, the design of Envelope / Building E has the capability to ensure that adequate solar access and cross ventilation is achieved.

### Landscape

Whilst some landscaping will be lost as a result of the proposed development, it is considered that the provision of aged care accommodation is paramount. The various landscaping zones will have different characters depending on their size, orientation, location and relationship to building uses and streets. Setbacks to the streets are in keeping with the existing facility and provide a generous landscape buffer to the facility that will ensure the amenity of surrounding residents and passersby.

As detailed above in Section 2.2.2, deep soil landscaping is provided in excess of what is required, with approximately 73% all landscaping provided (10,925m<sup>2</sup>) provided as deep soil landscaping.

### Amenity

The amenity impacts of the development on surrounding properties have been considered in-detail above, and at **Appendix A**.

The principles of the existing aged care facility have been maintained in the proposed development, with the corners of the buildings utilised for group functions with outlook to the surrounding environment. Similarly, solar access is provided to all areas through the use of narrow floor plates with opportunities for natural ventilation available to all rooms. The amenity of the self-contained apartments in proposed Envelope / Building E has been discussed above, with the apartments able to meet the requirements of SEPP 65 with respect to solar access, cross ventilation and private open spaces.

### Safety and Security

The proposed development provides adequate passive surveillance and access control as well as a clear distinction between the public and private domain.

The submission from ABC Planning notes the lack of on-site parking (and the subsequent requirement for staff to park in surrounding streets) as a security concern, particularly for female employees. The area is not considered a high-crime area, with no issues raised in relation to the safety or security of the locality. The proposed development, in addition to existing surrounding residences, will provide additional passive surveillance for staff walking to their vehicles at night.

### Social Dimensions

The proposed development will provide for an increase in aged care accommodation, which is critical considering the ageing population and the need to provide appropriate aged care facilities within existing communities.

The provision of aged care accommodation is considered paramount over issues relating to built form and density or unfounded concerns relating to a loss of amenity.

### Aesthetics

Aesthetics have been considered in the design of the built form, facades, balconies and roof form as well as in the materials, colours and textures used to provide a visually interesting building with high amenity for neighbouring residents, as well as future residents of the Home.

The provision of extensive landscaping both within the site, and in the setbacks will further enhance the aesthetics of the site.

## 2.7 Heritage

### 2.7.1 Issue

The submissions have questioned the accuracy of the Heritage Report which has not considered the portion of the Heritage Conservation Area which adjoins the site's north-eastern boundary.

## 2.7.2 Proponent's Response

In response to the concerns raised, Clive Lucas Stapleton has prepared a revision to the Heritage Impact Statement to take into account the full extent of the North Randwick Heritage Conservation Area (refer to **Appendix G**). The statement notes that the proposed buildings are located on the southern boundary of the Montefiore site, well away from the part of the site that lies adjacent to the Heritage Conservation Area. Further, the new buildings will be further away from the conservation area and significantly concealed by the existing four storey building and landscaping. As such, the new buildings will have a minimal visual impact on the heritage conservation area located to the north of the site.

Whilst the new buildings will be visible from the portion of the conservation area located at the junction of Dangar Street and Tramway Lane, when viewed from the street, the new buildings will not appear higher or bulkier than the existing buildings located to the north of the site. Further, because the proposed new buildings are setback from King and Dangar Streets, view lines to the conservation area from King Street, along Dangar Street, will be retained.

## 2.8 Stormwater

### 2.8.1 Issue and response

As a result of the change to the Concept Plan (the deletion of Building F and amalgamation of GFA into a new revised Building E), a revision to the site's stormwater detention facilities has been necessitated from those shown in the Stormwater Concept Plan.

Emerson Associates has reviewed the new plans and has provided commentary on this matter in an "amended Stormwater Report" which acts as an addendum to the above. This is attached at **Appendix H**.

Emerson Associates states that the revised plans will "involve combining the proposed detention facilities for the original Stages 2 and 3 into a single Stage 2 solution." They state that this may be able to comprise a single tank in the level 2 undercroft under the level 2 car park of the new Building E.

It is expected that "the single detention tank located at a higher elevation would offer an improved design with the detention storage well clear of the water table and with little restriction on volume." More detailed investigation is still required to ensure Randwick Council requirements can be achieved, particularly with respect to restricted outflow of the multiple basins on-site in conjunction with each other. The modelling and investigation has commenced and can be completed prior to the issue of a Construction Certificate for Building E. This is also reflected in the revised final Statement of Commitments at Section 4 below.

## 2.9 Sydney Water Utilities

### 2.9.1 Issue

Sydney Water raised the requirement to upsize the existing wastewater main from 225mm to 300mm on account of the proposal exceeding the recommended maximum loading for wastewater under the Sewerage Code of Australia (Sydney Water Edition WSA 02-2202). To meet requirements, Sydney Water advised that augmentation / extension would be required along King Street from near the site's western boundary westwards beyond its intersection with Mulwarree Avenue.

## 2.9.2 Proponent's Response

Sydney Water's submission contradicts their Notice of Requirements (NOR) for the Section 73 Subdivision / Developer Compliance Certificate, dated 8 July 2010. The NOR states that the 225mm main located within the property boundary is available for connection. Discussions held between KR Stubbs (Montefiore's Water Servicing Coordinator) and Sydney Water have confirmed that the NOR takes precedence over any subsequent submissions, or additional requirements. As such, the existing 225mm wastewater main is adequate to accommodate the proposed development. A copy of the NOR, correspondence between KR Stubbs and Sydney Water, and an explanatory statement prepared by DP Consulting Group Pty Ltd, who have been engaged to apply for the Section 73 certificate, are located at **Appendix I**.

## 2.10 Errors and Inconsistencies

### 2.10.1 Issue

ABC Planning outlined several errors and inconsistencies in the exhibited EAR in their response to the proposed development. The following inconsistencies were raised:

- page 12 - figure 1 states plan of existing building heights across the site and environs yet shows proposed building heights which could intimate to residents or landowners who reside elsewhere that the proposed buildings are existing;
- page 16 - states that there are bus services along King Street, however, no bus services operate along King Street.
- page 25 – child care facilities – the report states that there is to be an increase from 20 to 50 places whereas a development application before Randwick Council was approved for an increase from 60 to 80 children. This has significant implications for parking which is considered to be inadequate.
- landscaping contradiction – under Part 3.11, page 26, it is stated that 2,958m<sup>2</sup> will comprise deep soil planting whereas the compliance table on page 45 states that the proposed landscaping over podiums / basements is 2,958 m<sup>2</sup>. This is an important issue requires clarification by a detailed landscape calculation. Our calculation of the overall landscaped area indicates that the proposal is well under the stated 14,739m<sup>2</sup> which is equivalent to the 50% requirement under Randwick LEP.
- FSR excess incorrectly stated – there are three instances (pages 53 and 55) that it is stated that the proposed variation is 0.09:1. This has the implication that the applicant could consider that they have the right to achieve an FSR of 2.3:1. Such an important figure requires clarification.
- Heritage – the Statement of Heritage Impact and EAR do not make reference to the conservation area which also lies to the east of the site. This is a major deficiency.

### 2.10.2 Proponent's Response

The following response is provided to these inconsistencies:

- it is acknowledged that the incorrect image was provided at Figure 10 (page 12) of the exhibited EAR. This is an error, and was not intended to be misleading.
- it is recognised that no buses travel along King Street, this is an error, and is not considered to be of significant consequence to the assessment of the proposal. Notwithstanding this, there are a number of bus services within close proximity of the site.

- the DA for the extension of use of Moriah College Child Care Centre for a further 5 years as well as for 80 child care places was approved on 22 October 2010 by Council, whilst the EAR was on exhibition. The child care centre operates independently of Montefiore, and the operation of the child care centre is subject to the conditions of that approval. The redevelopment of the childcare centre under the proposed Concept Plan is some ten years away. During this time, the childcare centre will be subject to detailed design development, with additional consideration given to the provision of car parking. It is noted that the recent approval for the child care centre is limited to five years, after which time another DA has to be lodged to continue the use on the site.
- the landscaping figure provided on page 26 of the EAR is incorrect. As detailed in Section 2.2.2 above, under the PPR 14,964m<sup>2</sup> of landscaping is provided on the site. Of this, 4,039m<sup>2</sup> (or 27% of the landscaped area) is provided over podiums or excavated basements. The remaining 73% (10,925m<sup>2</sup>) will be provided as deep soil landscaping.
- as detailed in Section 2.1.2 and in **Table 1** above, the FSR calculations in the exhibited EAR did not take into account both the GFA and FSR concessions available to aged care facilities under the SEPP HSDP. Utilising the bonuses available to the proposal under SEPP HSDP, the development does not exceed the FSR for the 2C zone, and now (under the PPR) only exceeds the FSR for the 2B zone by 0.1:1. This equates to an exceedence of 1,711m<sup>2</sup> across the site. The correct FSR calculations as at the time of exhibition are found at **Table 1**. **Table 2** represents the current PPR scheme's level of compliance.
- it is noted that the Heritage Impact Statement does not make reference to the part of the conservation area which lies to the east of the site. This area was omitted because the north-eastern part of the Montefiore site, which adjoins this part of the conservation area, is not subject to redevelopment and so therefore will be no change and no negative impact as a result of the proposed Concept Plan and Project Application. The revised Heritage Impact Statement now addresses this matter - as discussed above.

## 2.11 Other Issues

The main issues raised by the Department of Planning, government agencies and the general public during the exhibition period have been addressed above. These issues, as well as a number of other issues, have been addressed in the response table at **Appendix A**. Issues addressed in the table which have not been addressed in this report include, but are not limited to:

- privacy;
- the planning process;
- loss of open space and environmental degradation;
- land use;
- light pollution;
- noise pollution;
- the child care centre;
- the provision of a covenant;
- pressure on infrastructure;
- odour impacts;
- impact on, and consultation with emergency services; and
- increase in staff numbers.

## 3.0 Concept Plan and Project Application Preferred Project

As a result of on-going design development, and in response to the submissions made, several minor amendments are proposed to the Concept Plan and Project Application. The architectural drawings of the revised development have been prepared by Jackson Teece and are located at **Appendix B**. The following section outlines the scope of development for which Concept Plan and Project Application approval is sought.

Any instrument of approval issued by the Department should adopt the following description. Where inconsistencies exist between the description outlined in this PPR and the exhibited EAR, this PPR prevails.

### 3.1 Key Changes to the Concept Plan

#### 3.1.1 Concept Approval

The Concept Plan now seeks approval for:

- New Envelopes D and E of between four and six storeys in height;
- 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 new childcare centre to replace the existing centre on the site;
- A total GFA of 37,968m<sup>2</sup> for new Envelopes D, E 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;
  - Serviced self-care units;
  - 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.
- New car parking spaces for 70 vehicles located at the lower / basement levels of new Envelopes D and E to bring the total number of spaces on-site to 217;
- Loading docks, stores and cool rooms at basement/lower levels of new Envelopes D and E;
- An undercroft car parking area beneath the childcare centre and a hardstand car park in the setback of the childcare centre 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; and
- 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.

A numerical overview of the car parking and accommodation provided by the PPR is provided in **Table 4** and **5** below. The existing provisions, as well as those proposed under the exhibited scheme are detailed for comparison, and to demonstrate the evolution of the design.

**Table 4 – Existing, Exhibited and Proposed Car Parking Provisions**

	Existing	Proposed As Exhibited	Proposed PPR	TOTAL
Buildings A and B	108	108	108	108
Buildings C and D	31	39	40	40
Building E	-	30	49	49
Building F	-	22	-	-
<b>SUB TOTAL</b>	<b>139</b>	<b>199</b>	<b>197</b>	<b>197</b>
Child Care	8	13	20	20
<b>TOTAL</b>	<b>147</b>	<b>212</b>	<b>217</b>	<b>217</b>

**Table 5 - Existing, Exhibited and Proposed Accommodation Provisions**

	Existing	Proposed As Exhibited	Proposed PPR
Hostel/Dementia Buildings A and B	227	227	227
Hostel (Building C)	49	38	35
Special Care / Dementia (Building D)	-	93	94
Hostel (Building E)	-	193	152
Self Care (Building E)	-	-	36
Self Care (Building F)	-	35	-
<b>TOTAL</b>	<b>276</b>	<b>586</b>	<b>544</b>



### 3.1.2 Deletion of Envelope F and the Redesign of Envelope / Building E

In order to provide for a better transitional element between the Montefiore site and the adjoining Centennial Apartments, proposed Envelope F has been deleted, and incorporated into a redesigned Envelope / Building E.

Key features of the preferred design include:

- An increased setback between the Centennial Apartments and the Montefiore site. The originally proposed 8.5m setback from the boundary will be increased to 14m (18m at the Level 6) increasing the separation distance between the Centennial and the Montefiore site to 22.5m.
- Provision of a 3m wide, dense planting buffer zone between the western boundary and the relocated childcare centre.
- The addition of a 'green roof' to the childcare centre, providing an increased landscape screen edge to the hostel and self care accommodation above the childcare centre.
- The large balconies on the hostel floors are now non-accessible, and have been replaced with generous planter boxes. This will provide a pleasant outlook for residents of the Centennial, and will reduce the potential for overlooking.
- Balustrades will be designed to limit views down, but will still enable horizontal views and light.
- Windows on the western facade of Building / Envelope E will be screened for western sun. The screens have been designed to limit perpendicular views out, however facilitate the southern and northern outlook.

### 3.1.3 Redesign of Childcare Centre

The deletion of Building F has enabled the childcare centre design to be reconsidered. Whilst the centre will remain in the same place, the space has been reconfigured so that outdoor play space along the site's western boundary is minimised, to reduce potential amenity impacts on the adjoining Centennial Apartments. In summary, the childcare centre has been modified as follows:

- A 3m wide dense planting buffer zone is proposed between the western boundary and the relocated childcare, providing a visual and acoustic buffer in tandem with the proposed 1.8m high wall.
- The external play area has been relocated to the north of the proposed childcare centre, limiting the amount of open space adjacent to residential dwellings.
- The revised location of the open space corresponds with communal open space on the adjoining site, and does not adjoin dwellings, or private open space.
- The relocation significantly improves the amenity to the adjoining properties as well as proving a better aspect for the external play area.

## 3.2 Merits of Key Changes to the Concept Plan

### 3.2.1 Improved Transition between Building E and the Centennial Apartments

The deletion of Envelope F, and the redesigned Building / Envelope E will improve the amenity of residents in the adjoining Centennial Apartments, providing a significantly improved transitional element between the two sites. In summary, the key changes will have the following benefits:

- Increased privacy with potential for overlooking minimised by the provision of increased setbacks, and the deletion of external terrace.
- A more pleasant outlook for residents of the Centennial, with the provision of a green roof to the child care centre, as well as planted balconies which will provide a green outlook for residents.
- Reduced overshadowing impacts, with the proposal having no impact on the Centennial Apartments after 9:11am on the winter solstice.

## 3.3 Key Changes to the Project Application

The proposed changes to the Project Application have been identified with clouding on the architectural plans at **Appendix B**. The changes are minor in nature, and are the result of on-going design development. Key changes include:

- relocation of the services corridor at Level 1.
- relocation of locker rooms and cyclist facilities.
- reconfiguration of plant and storage rooms.
- inclusion of a coffee room at Level 3.
- deletion of the external balconies on the Dangar Street frontage of Block D at Levels 4-7 and provision of non-accessible planters.
- deletion of the adult day care courtyard to the west of Building C and consolidation of this use with the internal courtyard at Building D.
- minor modifications and reconfigurations to landscaped areas and courtyards.
- revised facade treatments and detailing.

## 3.4 Merits of Key Changes to the Project Application

The modifications described above are the result of detailed design development, and will enhance the operational efficiency of the Montefiore Home. In summary:

- The service corridor now shown at Level 1 will create a more efficient connection from the kitchen and laundry facilities. The addition of these corridors keeps these movements 'back of house' and out of main circulation corridors.
- Consolidating the end of trip facilities will better promote alternative travel options and allow for ease of showering and changing close to the central workplaces on the site.
- The configuration of the plant and storage rooms is a result of on-going design refinement, taking into consideration the operational needs of the facility.

- The coffee shop provided in Building D is needed in addition to the current facility in Building A, as Building D is dementia-specific unit, and residents have a tendency to abscond. Providing this facility for the benefit of residents and their visitors within the unit affords them this amenity without the potential for other residents absconding as they enter or leave the unit.
- The balconies on the Dangar Street frontage of Building D have been deleted, as they were not functionally appropriate for dementia care. Residents need an area in which to walk a circuit, as provided in the courtyard. As residents are required to be accompanied whilst outdoors, the provision of a consolidated outdoor space in the internal courtyard means staff are able to focus their attention on one area. The planters which have been incorporated instead maintain a pleasant outlook for residents, and help to visually break up the Dangar Street façade.
- In relation to the adult day care courtyard, this outdoor space is currently located to the east of Building C and will be demolished as part of the proposed works. The previous scheme showed this space reinstated on the western side of Building C. However, as this space would be demolished again with the construction of Building E, and given the relative infrequency of its use, it was considered that allowing the day centre secure access to the internal courtyard of Building D was a better solution.
- Façade revisions have been made to better articulate vertical 'bays' at the Dangar Street façade, using a central balcony element with planters, with flanking bays of screened windows. Likewise, at the King Street frontage, the 'bay' modulation of the façade has been further developed, now including a retractable awning for more flexible utilisation of the public plaza space.

## 4.0 Final Statement of Commitments

In accordance with Part 3A of the *Environmental Planning and Assessment Act 1979*, the following are the commitments made by the Sir Moses Montefiore Jewish Home to manage and minimise potential impacts arising from the proposal. These commitments replace the draft commitments included with the EAR.

Words proposed to be deleted are shown in ~~bold strike~~ through and words to be inserted are shown in ***bold italics underlined***.

Subject	Commitments	Approved by Whom	Timing
Approved Project	<p><b>Concept Plan:</b></p> <p>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.</p>	Department of Planning	No timing. General Statement of Commitment
Preliminary Construction Management Plan	<p><b>Concept Plan:</b></p> <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
	<p><b>Stage 1 Project Application:</b></p> <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><i>Construction Requirements</i></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>	Department of Planning	Prior to the issuing of a construction certificate

Subject	Commitments	Approved by Whom	Timing
	<p><i>Montefiore Residents</i></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><i>Traffic Management</i></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> <p><i>Pedestrian Footpaths</i></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><i>Site Access</i></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> </ul> <p>Site deliveries will continue through Dangar and King Streets in coordination between Montefiore and the Head Contractor</p>		

Subject	Commitments	Approved by Whom	Timing
	<ul style="list-style-type: none"> <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><i>Noise and Vibration Mitigation</i></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><i>Dust from Demolition and Construction Works</i></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><i>Storm Water Runoff</i></p> <ul style="list-style-type: none"> <li>Silt socks and filter fabric will be used in stormwater runoff pits and gutters</li> </ul>		

Subject	Commitments	Approved by Whom	Timing
	<p><i>Removal of Hazardous Materials</i></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><i>Waste Water Collection</i></p> <ul style="list-style-type: none"> <li>Waste water will be treated prior to disposal</li> </ul> <p><i>Air Quality</i></p> <ul style="list-style-type: none"> <li>Burning of combustible materials on site is not permitted</li> </ul> <p><i>Complaints</i></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> <p><i>Safety</i></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><i>Waste Management</i></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> </ul>		

Subject	Commitments	Approved by Whom	Timing
	<ul style="list-style-type: none"> <li>All waste management processes will be in accordance with WorkCover's Occupational Health and Safety requirements</li> </ul> <p><i>Environmental Management Plans</i></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><i>Erosion and Sediment Control</i></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><i>Tree Preservation and Protection Plan</i></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>		
Construction Traffic	CTMPs will be prepared specifically for each stage of the construction. The CTMPs will incorporate the principles discussed in <b>Section 5.19</b> of this report and the Traffic and Parking Assessment at <b>Appendix O</b> .		
<u>Stormwater Drainage</u>	<p><u>Concept Plan:</u></p> <p><u>Stormwater Drainage Plan prepared by Emerson Associates will be submitted to the Department of Planning for approval Prior to issue of the Construction Certificate for Building E.</u></p>	<u>Department of Planning</u>	<u>Prior to issue of the Construction Certificate for Building E</u>
<u>Road Design</u>	<p><u>Concept Plan</u></p> <p><u>The proposed development has been designed in accordance with AS 2890.1 - 2004.</u></p>	<u>Department of Planning</u>	<u>Prior to the issuing of a construction certificate</u>
<u>Plant Equipment</u>	<p><u>Concept Plan and Stage 1</u></p> <p><u>Mechanical equipment and plant on the roofs of buildings will be subject to the applicable noise standards</u></p>	<u>Department of Planning</u>	<u>Prior to the issuing of a construction certificate for each building</u>



## 5.0 Conclusion

McLachlan Lister, the Sir Moses Montefiore Jewish Home, and its consultant team has considered the issues raised by the Department, Council, State agencies and the public during the public exhibition process and have revised the exhibited Concept Plan and Project Application to address these concerns. The result of this process is the Preferred Project, which presents the most appropriate and best planning outcome in terms of environmental impacts, public benefit, and achieving strategic planning objectives for the provision of aged care accommodation.

This Report, in conjunction with the EAR, has demonstrated that the Concept Plan and Project Application will have minimal adverse environmental effects. The proposal is generally consistent with the FSR controls for the site, and the proposed variations to the height standard is supported by the merits of the project, substantial public benefit, and the absence of any significant adverse amenity impacts.

The proposal will result in positive economic, environmental and public benefit by providing an aged care facility within an existing community, thereby promoting ageing in place and the economic use of land. The proposal also provides a publicly accessible plaza at the corner of King and Dangar Street which will serve to activate the street frontage and enhance the amenity of the site for the public.

Given the environmental planning merits described above, and significant public benefits proposed, it is requested that the Minister approve the Concept Plan and Project Application under Section 75O of the EP&A Act.