

(Contact Officer: David Ongkili - 9399 0793.)
Your Ref: MP09_0188 and MP10_044

22 March 2011

The Director – Metropolitan Projects
Department of Planning
23-33 Bridge Street
Sydney 2000

Attention : Mr Ben Lusher

Dear Sir,

SUBJECT LAND: 100-120 King Street and 30-36 Dangar Street, RANDWICK NSW 2031.
APPLICATION NO: MP09_0188 and MP10_044
PROPOSAL: Preferred Project Report for the Expansion of the existing Aged Care Facility at Sir Moses Montefiore Jewish Home

I refer to the above applications relating to the Concept Plan and Stage 1 Project Application and, specifically, the Preferred Project Report (PPR) dated January 2011 for the project. Following a review of key issues and the proponent's response to these issues contained in the PPR, Council would advise as follows:

Density

Council notes the revised FSR provided in the PPR following "typographical" errors in the FSR detailed in the exhibited Environmental Assessment Report. Notwithstanding the new FSR for the PPR scheme now being a corrected figure of 1,711 sqm in excess of the maximum allowable GFA under the SEPP HSDP, this is still considered a significant amount that adds to the bulk and scale of the proposed development. Accordingly Council reiterates its earlier concern that, the breaches in density and height proposed under the PPR are still at the upper limit that the subject site can tolerate relative to the existing and future character of surrounding development under the established Residential 2C and Residential 2A zonings. In particular, Council's concern that the potential for this current breach in the FSR to act as a precedent for future breaches in further expansions of the Montefiore facility remains valid.

Height

The argument that there are no height bonuses to correlate with the FSR bonus control under the SEPP HSDP, whilst expedient for the PPR scheme, is no justification for introducing the proposed amendments under the current PPR scheme which not only retains the same increased height, bulk and scale on King Street (as that in the exhibited EAR) but actually increases the building mass on King Street.

In response to the exhibited EAR, Council has outlined a number of urban design measures to alleviate the increased height and massing on King Street as follows:

- *King Street shall be reinforced 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 that not only breaks the visual bulk and scale of these buildings but also provide high quality finishes that will respect the existing and future residential character of the King Street as well as Dangar Street streetscapes.*
- *The provision of 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.*
- *The provision of increased pedestrian permeability through the subject site to soften the perception of a wall/gated effect along King Street and Dangar Street given the long linear massing on these streets.*
- *The provision of a more integrated typology of open spaces in the subject site that addresses the principal function (e.g. entry forecourt, circulation corridors, walking, sitting, buffer and etc.) and landscape character (e.g. dense vegetation buffer area, open lawn, informal gardens and 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.*

The PPR has not included any of these measures essentially advising at Page 8 of the PPR that "... the apparent massing of the development is mitigated by the design of the buildings". Council would reiterate that the design of the building under the PPR as shown in the South Elevation – King Street (Appendix B), remains essentially a monolithic, unrelieved 5 storey walled built form along almost the whole length of King Street which, without appropriate breaks and landscape treatment as outlined in Council's recommendation points above, no amount of design can effectively conceal.

Whilst much has been said in the PPR regarding the deletion of Envelope F and transitional element to the Centennial Apartments, this measure is localised with minimal impact on the broader massing on King Street. Rather, the "deletion of Envelope F" has merely resulted in the transfer of the deleted bulk into a larger, taller and longer Block E thus increasing the massing and scale on King Street, which together with the dismissal of Council's design recommendations above, results in a more intrusive and overbearing built form on King Street under the PPR. This serves only to undermine any purported improvement in amenity to the Centennial Apartments under the PPR. In fact, Council would point out that:

1. Figure 7 of the PPR shows that the Envelope E will be **closer** to the Centennial Apartments (than the Exhibited EAR proposal) by virtue of the proposed Level 1 child-care section of the building extending and bringing an intense activity closer to the adjoining Centennial Apartments (minimum setback 3m).
2. The Site Analysis Plan under the Exhibited EAR shows a greater setback (minimum 8m) between buildings compared to that now proposed in the Site Analysis Plan under the PPR (minimum 3m).

Public Square

The PPR retains the same shape and configuration for the proposed public square at the corner of Dangar and King Streets as that shown in the exhibited EAR. Council has previously raised concerns that the proposed public square is essentially a remnant space resulting from the progressive paring of its size as originally shown in the previous master plan and development approvals for the

site. The PPR retains an awkward linear configuration that impedes its function for passive recreational or spontaneous activities. Council maintains that the so-called public square remains, under the PPR, only a generous setback to the proposed Building D to justify this building's breach of the height limit.

In previous submissions on this matter, Council has consistently advised that consideration should be given to increasing the depth of the plaza, improving the geometric configuration and creating a terminating vista of higher quality to Church Street. In particular, Council has indicated that the proposed elongated square will be treated as a designated setback area that is not useable as a public open space for the community as intended for the proposed public square under the Master Plan and development consent. Council maintains that the function, form and performance of the proposed public square should be in the context of the existing Montefiore facility and the public streetscape and surrounding community that this facility is located in and is a part of. The PPR has disregarded this issue and

Traffic and Parking

In relation to traffic and parking, Council indicated that assessment should be made of the following activities which have a significant impact on the state of on-street parking in adjoining and surrounding streets:

- The adequacy of the parking facilities in catering for overlapping staff shifts.
- The proposed allocation of parking spaces between staff members, residents, family visitors and external services, including medical consultants, tradesmen and the like.
- The implications of any weekend peak traffic when family members are likely to pay visits. Given that the access driveways are gated, the report should indicate whether vehicles would queue and park on public roads as a result of the intensified operation.
- Existing parking restrictions relating to kerb side spaces in the vicinity to the site.
- Details of any short-term parking spaces within the site, including those adjacent to the main reception area.
- The concurrent parking needs and traffic implications of the childcare centre based on the current and proposed children numbers.

It should also be noted that the increased floor area of Buildings C and D in the Stage 1 development under the PPR have not been accompanied by a further parking analysis addressing the attendant increase in car parking. In this regard, the Stage 1 development involving additional aged care beds and retail uses do not have adequate carparking within the Stage 1 development proposal (that is, the Stage 1 development is not self-sufficient in carparking).

The PPR provides no additional insight, let alone, added assurance that the introduction of the expanded would not adversely impact upon currently stretched availability of on-street parking. Rather the PPR merely states that *"It is not the responsibility of the Home to impose regulations on on-street parking as it has no jurisdiction over these spaces"*. Since the Home has clear jurisdiction over its staff and facility, and given that, with the expanded facility, there will be staff who will still choose to park on residential streets as a matter of preference, the Home should make an appropriate statement of commitment that it would apply

stringent management initiatives to ensure that all staff driving to work park their cars on site.

Additionally, the Green Travel Plan proposed in the PPR, whilst commendable, is not supported by any concrete implementation measures nor any specific commitment in the Statement of Commitments to implement this Plan.

It is noted the following details are still not included in the traffic study (including the updated assessment for the PPR) which would be critical to assessing the traffic impacts at a micro-level in the immediate vicinity of the subject site:

- Details on the direction of traffic and one-way / two-way movements of all internal roads.
- Details on the drop-off and pick-up zones for both the aged care facility and the child care centre.
- Access routes for service vehicles.
- Access facilities for people with disabilities.
- Details of on-street pedestrian safety related facilities such as pedestrian refuges.

In conclusion, Council would advise that, for a document that is required under Part 3A to address issues raised by the public and relevant agencies, it is somewhat regrettable that the PPR appears as a document that predominantly serves to introduce an expedient amended proposal for the existing Home rather than a positive proposal to deal with the issues raised by Council above.

Should you have any queries, please do not hesitate to contact Council's officer, David Ongkili, on 9399 0793.

Yours faithfully,

Kerry Kyriacou
Manager – Development Assessment