



Planning & Infrastructure

MAJOR PROJECT ASSESSMENT:

Expansion of Existing Residential Aged Care Facility

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

MP 09_0188 & MP 10_0044



Director-General's
Environmental Assessment Report
Section 75I of the
Environmental Planning and Assessment Act 1979

June 2011

ABBREVIATIONS

| | |
|---------------------|--|
| CIV | Capital Investment Value |
| Council | Randwick City Council |
| Department | Department of Planning and Infrastructure |
| DGRs | Director-General's Requirements |
| Director-General | Director-General of the Department of Planning |
| EA | Environmental Assessment |
| EP&A Act | Environmental Planning and Assessment Act 1979 |
| EP&A Regulation | Environmental Planning and Assessment Regulation 2000 |
| EPI | Environmental Planning Instrument |
| MD SEPP | State Environmental Planning Policy (Major Development) 2005 |
| Minister | Minister for Planning |
| PAC | Planning Assessment Commission |
| Part 3A | Part 3A of the Environmental Planning and Assessment Act 1979 |
| PEA | Preliminary Environmental Assessment |
| PFM | Planning Focus Meeting |
| PPR | Preferred Project Report |
| Proponent | Sir Moses Montefiore Jewish Home |
| RtS | Response to Submissions |
| Seniors Living SEPP | State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 |

Cover Photograph: Perspective view looking west along King Street

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NSW Government

Department of Planning & Infrastructure

EXECUTIVE SUMMARY

The Proponent, Sir Moses Montefiore Jewish Home proposes to expand the existing residential aged care facility at 100-120 King Street and 30-36 Dangar Street, Randwick. The site has a total area of 29,353m² and currently accommodates an aged care facility and a child care centre in an established urban area. It is situated approximately 1 kilometre from the Randwick Town Centre and approximately 4 kilometres from the Sydney CBD.

The proposal seeks Concept Plan approval for the expansion of the existing Sir Moses Montefiore Jewish Home residential aged care facility, comprising new building envelopes, landscaping, vehicular access, a public square, redevelopment of the existing childcare centre and a retail space. This Concept Plan is sought to be carried out in the following two stages (Project Approval is sought for Stage 1):

- **Stage 1:** A 5 storey building toward the south-eastern corner of the site providing residential aged care accommodation and support services, a retail unit, parking facilities and a public square at the corner of King and Dangar Streets; and
- **Stage 2:** A building envelope of between 4-6 levels toward the south western corner of the site providing residential aged care accommodation and ancillary spaces, a new child care centre to replace the existing and associated car parking.

The proposed Concept Plan has a Capital Investment Value (CIV) of **\$137 million**. The proposal will create **150** full time equivalent construction jobs and **89** full time equivalent operational jobs. The proposal is a major project under Part 3A of the *Environmental Planning and Assessment Act 1979* (the Act) because it is development for the purpose of a residential, commercial or retail project with a CIV of more than \$100 million under clause 13 of Schedule 1 of *State Environmental Planning Policy (Major Development) 2005*. Therefore the Minister for Planning is the approval authority. As the application has attracted more than 25 objections including Randwick City Council, the Department will refer the application to the PAC for determination.

The Department exhibited the proposal in accordance with the requirements of the Act and received 70 submissions - submissions from 5 public authorities and 65 submissions from public and special interest groups. These submissions raised a number of concerns, focusing on the proposed scale of the building and the potential amenity impacts arising from the development, car parking and traffic impacts.

The Department has considered the merits of the proposal in accordance with the objects of the Act and ecologically sustainable development, also taking into consideration the issues raised in all submissions. It is considered that the proposed development is an appropriate site specific response to the increased demand for aged care places in existing built up areas of inner Sydney. This demand is recognised by the Seniors Living SEPP and the Draft East Subregional Strategy which identifies a significant need within the area to provide different housing forms to promote 'ageing in place'.

In addition, the Department considers the built form of the proposed development is appropriate as it fits within the context of the locality and all associated impacts resulting from the proposal are minor and do not reasonably form the basis for either refusal or any further modification of the proposal.

It is considered that all issues raised have been addressed in the PPR, the Statement of Commitments and recommended conditions. Likely impacts can be suitably mitigated and/or managed to ensure a satisfactory level of amenity and environmental performance. For these reasons the project is considered to be in the public interest and it is recommended that the applications be approved, subject to conditions.

TABLE OF CONTENTS

| | | |
|-------------------|--|-----------|
| 1. | BACKGROUND | 1 |
| 1.1 | Site Description and Location | 1 |
| 1.2 | Existing Site Features | 1 |
| 1.3 | Surrounding Development | 2 |
| 1.4 | Surrounding Heritage Items | 3 |
| 1.5 | Masterplan | 3 |
| 2. | PROPOSED PROJECT | 4 |
| 2.1. | Project Description (as exhibited) | 4 |
| 2.2 | Preferred Project Report | 4 |
| 2.3 | Indicative Project Staging | 7 |
| 2.4 | Project Need and Justification | 8 |
| 3. | STATUTORY CONTEXT | 9 |
| 3.1. | Major Project | 9 |
| 3.2 | Permissibility | 9 |
| 3.3 | Environmental Planning Instruments | 10 |
| 3.4 | Objects of the EP&A Act | 10 |
| 3.5 | Ecologically Sustainable Development | 11 |
| 3.6 | Statement of Compliance | 11 |
| 4. | CONSULTATION AND SUBMISSIONS | 12 |
| 4.1. | Exhibition | 12 |
| 4.2. | Public Authority Submissions | 12 |
| 4.3. | Public Submissions | 13 |
| 4.4 | Proponent's Response to Submissions | 14 |
| 5. | ASSESSMENT | 15 |
| 5.1 | Built Form | 15 |
| 5.2 | Amenity Impacts to Adjoining Properties | 20 |
| 5.3 | Car Parking and Traffic | 24 |
| 5.4 | Residential Amenity | 26 |
| 5.5 | Other Issues | 28 |
| 6. | RECOMMENDATION | 29 |
| APPENDIX A | ENVIRONMENTAL ASSESSMENT | 30 |
| APPENDIX B | SUBMISSIONS | 31 |
| APPENDIX C | PROONENT'S RESPONSE TO SUBMISSIONS | 32 |
| APPENDIX D | CONSIDERATION OF ENVIRONMENTAL PLANNING INSTRUMENTS | 33 |
| APPENDIX E | POLITICAL DONATION DISCLOSURES | 41 |
| APPENDIX F | RECOMMENDED CONDITIONS OF APPROVAL | 42 |

1. BACKGROUND

1.1 Site Description and Location

The subject site is commonly known as the Sir Moses Montefiore Jewish Home and is located at 100-120 King Street and 30-36 Dangar Street, Randwick. It is owned by Sir Moses Montefiore Jewish Home and comprises a single allotment identified as Lot 202 in DP 879576. The site has an area of 29,353m² and currently accommodates an aged care facility and a child care centre.

The site is located on the north-western corner of King and Dangar Streets, Randwick (in the Randwick Local Government Area) in an established urban area. It is situated approximately 1 kilometre from the Randwick Town Centre (to the southeast) and approximately 4 kilometres from the Sydney CBD (to the northwest).

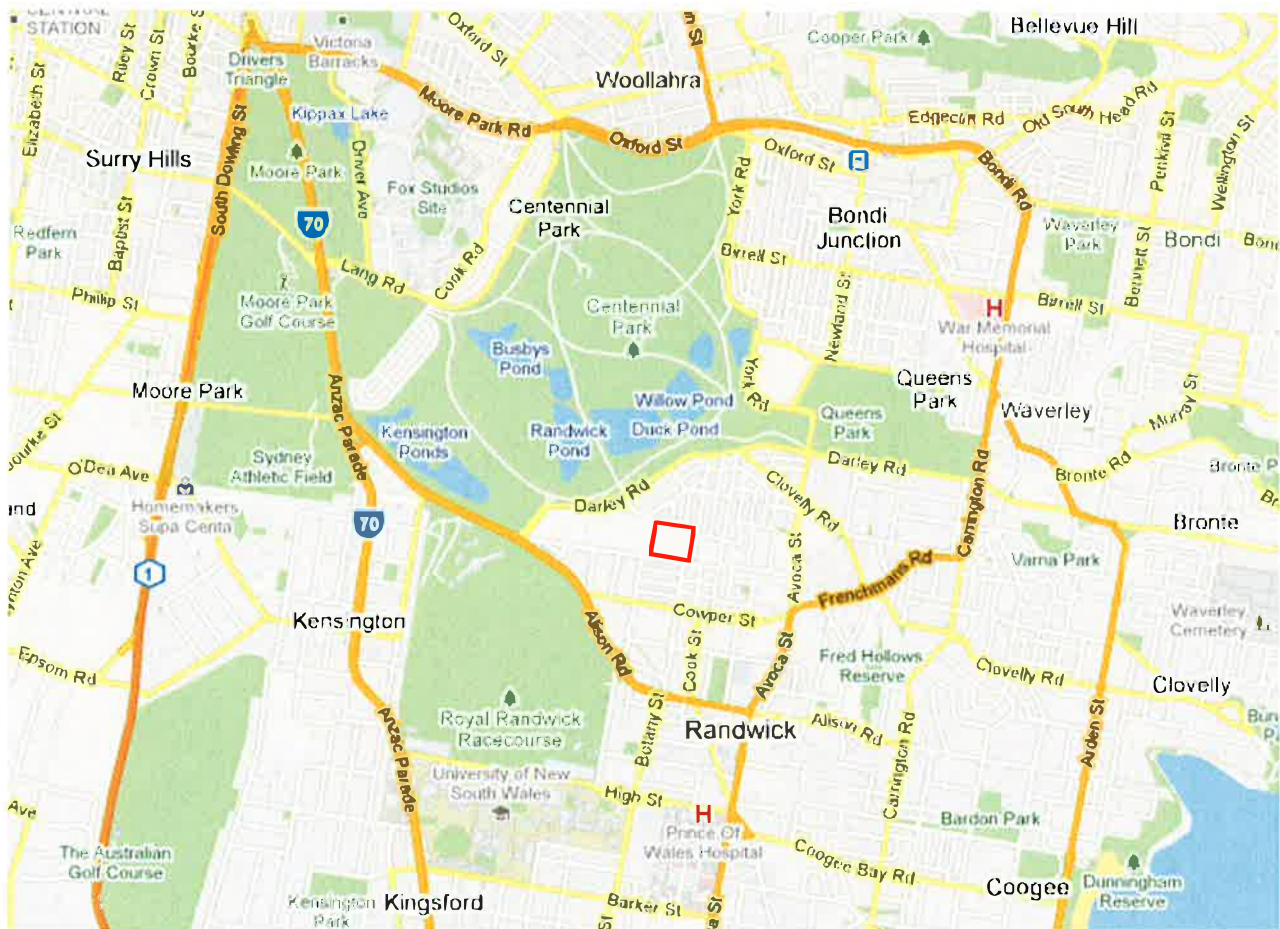


Figure 1: Site location (site is outlined in red).

1.2 Existing Site Features

The site has street frontage on three sides, to the south (178 metres along King Street), east (165 metres along Dangar Street) and north (175 metres along Govett Lane). King Street slopes gently downhill from east to west and Dangar Street slopes gently downhill from south to north. The site is undulating however generally slopes down from both the southern and northern boundaries to a natural depression toward the western end. The levels vary across the site by just over 9 metres, with the high point toward the corner of King and Dangar Streets at the south eastern corner (RL45.86m) and the low point on the western side (RL36.58m).

The northern portion of the site is predominantly occupied by the existing aged care facility (shown below as buildings A, B & C) which ranges from 3-5 storeys in height. Building C extends into the southern portion of the site, which otherwise comprises landscaped areas and hard stand car parking. An existing child care centre occupies the south western corner.

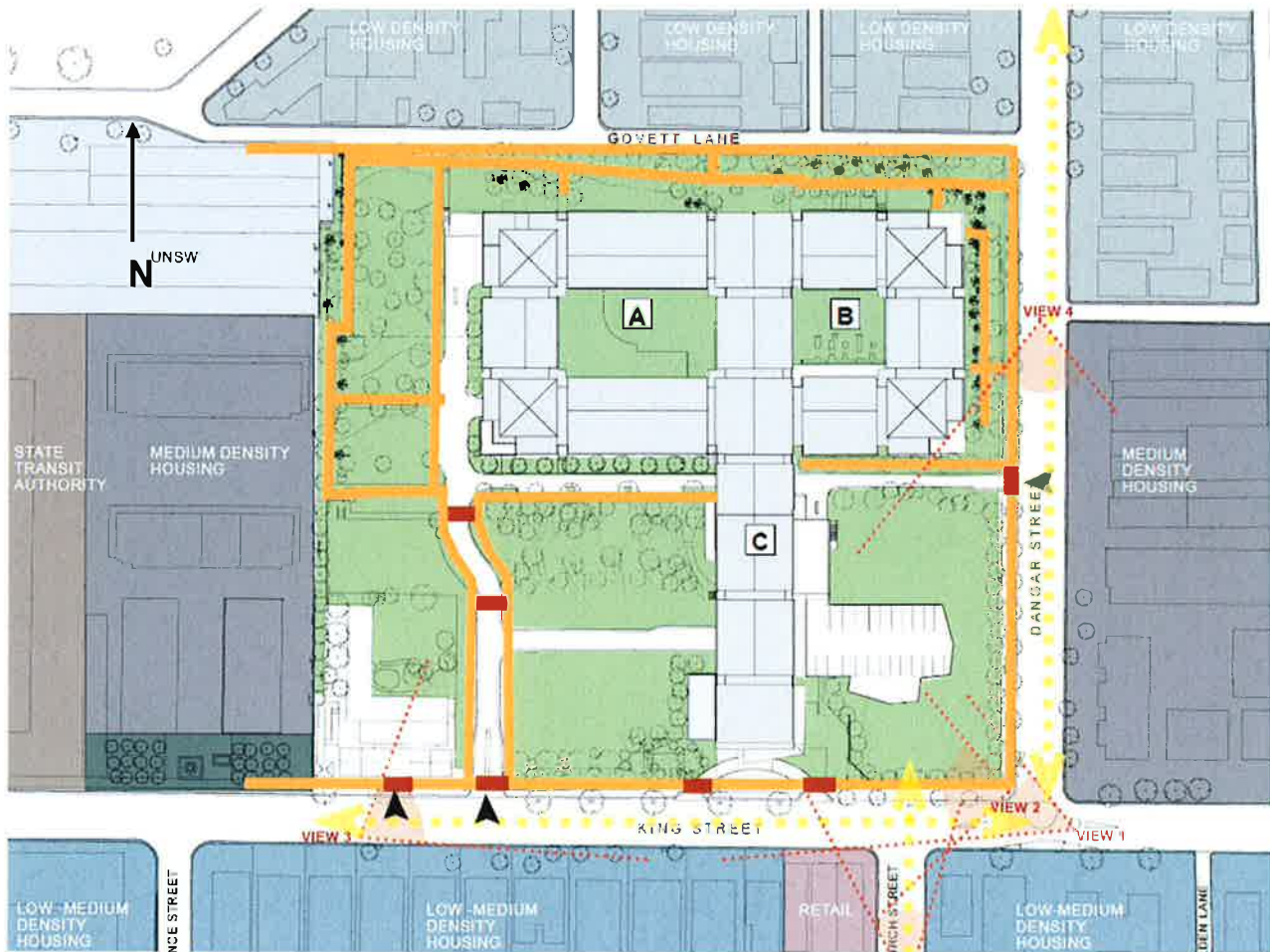


Figure 2: Existing site layout and surrounding context.

A stormwater detention basin is located in the natural basin toward the western portion of the site and is incorporated into on-site landscaping.

The aged care facility is provided with vehicular access via a crossing and a porte cochere on King Street to the south and a vehicle crossing on Dangar Street to the east. The child care facility is also provided with vehicular access via a separate crossing on King Street to the south.

1.3 Surrounding Development

The site lies within an established urban area which accommodates a range of building forms, land uses and services including, educational institutions, a bus depot, neighbourhood retail and predominantly low and medium density residential uses. More specifically:

- Immediately adjoining the site to the west is a group of residential flat buildings between 3 and 5 storeys in height. Also immediately to the west is a steel clad building occupied by the University of NSW approximately 15 metres in height. Extending beyond this to the west is an institutional precinct occupied by the Randwick Bus Depot, the UNSW Campus and Sydney College of TAFE – Randwick.
- To the north of the site across Govett Lane is a low density residential area accommodating detached 1-2 storey dwellings. These dwellings comprise the southern extent of the North Randwick Heritage Conservation Area which extends further to the north and east also encapsulating Centennial Park.
- Directly to the east of the site across Dangar Street is a group of residential buildings. The area to the north of Tramway Lane also forms the southern extent of the North Randwick Heritage Conservation Area and accommodates low density residential development in the form of detached dwellings. The area to the south of Tramway Lane accommodates medium density development in the form of three storey residential flat buildings on larger allotments.

- To the south of the site along King Street is a mix of low to medium density residential development. The area on the eastern side of Church Street accommodates a number of 3-4 storey residential flat buildings. A small group of neighbourhood shops is located on the western side of the intersection of Church and King Streets. Detached and semi-detached dwellings line the southern side of King Street further to the west.



Figure 3: Site location and surrounding development.

1.4 Surrounding Heritage Items

A brick chimney stack associated with the former Randwick Tram Depot is identified as a locally significant heritage item and is located at 90-98 King Street adjoining the site to the west.

1.5 Masterplan

In August 2002, a Masterplan for the Montefiore site was submitted to Randwick Council under the provisions of Clause 40A of the Randwick LEP 1998 and Part 4 of the EPA&A Act, and was adopted on 27 August 2002. A Development Application was subsequently lodged with Council in accordance with the Masterplan. On 22 October 2002, Council approved this application. The existing Montefiore facility was constructed in accordance with that approval (as modified) and commenced operation in 2007. On 27 August 2007, the Masterplan lapsed after 5 years in accordance with the resolution of Council and is no longer in force.

2. PROPOSED PROJECT

2.1. Project Description (as exhibited)

As exhibited the key components of the project are summarised in the table below. The project is described in full in the Proponent's EA, which is attached as Appendix A.

Table 2 Key Project Components:

| Aspect | Description |
|--------------------------------------|---|
| Concept Plan | <p>The proposal seeks Concept Plan approval for the expansion of the existing Sir Moses Montefiore Jewish Home aged care facility and comprises the following:</p> <ul style="list-style-type: none"> • Three new building envelopes (known as Buildings D, E and F) and ranging from 4-6 storeys in height with lower level/basement car parking and an additional level (level 6) above the existing aged care facility (known as building C). • This equates to a total gross floor area of 38,394m² for the site. • Use of the Buildings D and E and additional level on Building C for the purpose of a range of residential aged care accommodation and ancillary spaces. • Use of Building F for the purpose of serviced self-care units at the upper levels and an expanded child care centre at the lower level with basement parking. • Public space/square on the corner of King and Dangar Streets. • A retail space of 350m² at the street level fronting onto the public square/space. • An additional 57 on-site car parking spaces, increasing the total number to 212. • Associated landscaping and drainage infrastructure. |
| Project Application (Stage 1) | <p>Project approval is sought for the construction and use of Stage 1 of the Concept Plan which comprises:</p> <ul style="list-style-type: none"> • Building D consisting of 5 levels. The new building is sought to provide residential aged care accommodation and associated support services, retail unit and lower level parking facilities; • The proposed public square, being 1,080m² in area; and • Construction of a temporary car park within the footprint of proposed Building E which will be utilised until the proposed Building E is constructed. |
| Employment: | <ul style="list-style-type: none"> • Construction: approximately 150 • Operational: approximately 89 additional jobs (total of 289) |
| Capital Investment Value | \$137 million |

2.2 Preferred Project Report

On 24 January 2011, the Proponent submitted a PPR in response to various agency and public submissions. The PPR amended the proposed development, with the following key changes made (as shown in Figures 4 and 5 below):

- Amalgamating Building Envelopes E and F into a single Building Envelope E with increased separation to the western boundary, and reduction in the height of the proposed building envelope toward the western boundary.

- Reconfiguration of accommodation types (hostel beds and self care units) into separate floors in proposed Building Envelope E.
- Reconfiguration of the proposed child care centre, clarification of the number of places to 80 children, an additional 7 parking spaces and redesign of pick-up drop-off area.
- Overall reduction in gross floor area of 426m².

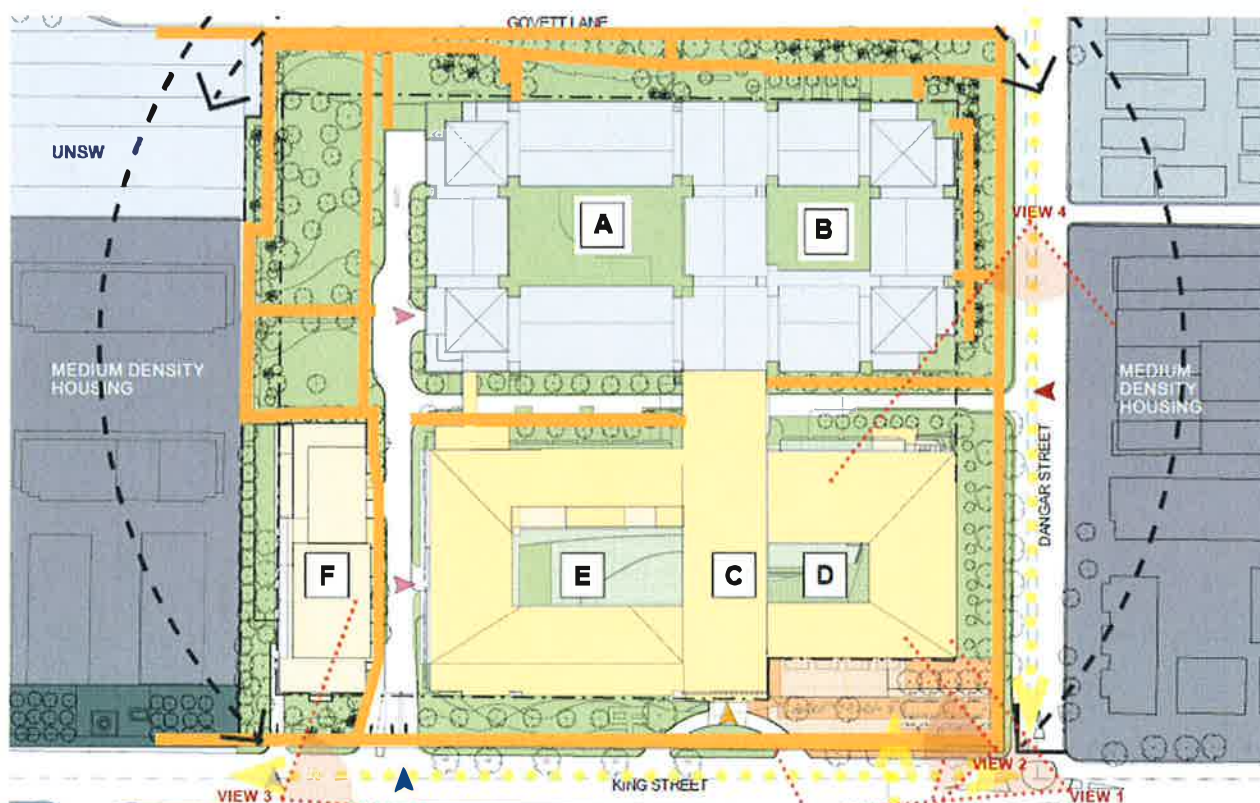


Figure 4: Proposed site layout as originally proposed and exhibited

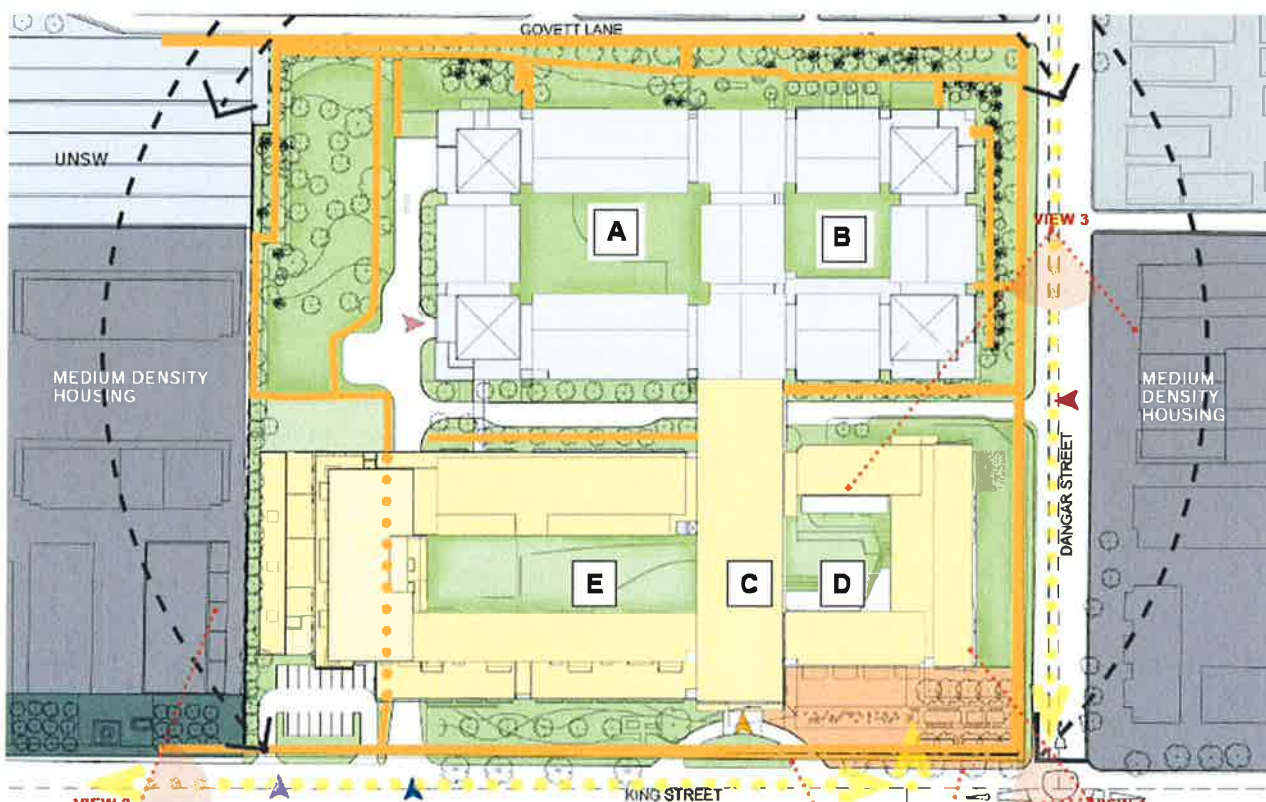


Figure 5: Site layout as proposed in the PPR.

Key changes to the Project Application incorporate:

- Internal reconfigurations to service areas, locker rooms and cycle facilities and inclusion of coffee room in level 3;
- Deletion of external balconies on the Dangar Street frontage of Building D at Levels 4-6 and the provision of non-accessible planters; and
- Revised facade treatments and detailing.

The PPR sets out that approval is now sought for:

- Two new building envelopes (known as Buildings D and E) of between 4-6 storeys in height and an additional level (level 6) above the existing aged care facility (Building C);
- A new child care centre as part of Building E to replace the existing, with associated access and car parking;
- A total additional gross floor area of 18,944m² for Buildings D and E and the additional level to Building C;
- Use of Buildings D and E and the additional level on Building C for the purpose of a range of residential aged care accommodation and ancillary spaces;
- Public space/square on the corner of King and Dangar Streets;
- A retail space of 350m² at the street level fronting onto the public square/space;
- Additional 62 parking spaces on-site to a total of 217 spaces; and
- Associated landscaping and drainage infrastructure.

Table 2: Key Project Components (PPR)

| Development Criteria | Proposed | |
|-----------------------------|--|----------------------------|
| Max. Building Height | 20.2 metres (at NW corner of the proposed Building Envelope E) | |
| Gross Floor Area (GFA) | Seniors Housing | 36,861m ² |
| | Retail & Child care | 350 & 757m ² |
| | Total | 37,968m² |
| FSR | Seniors Housing | 1.255:1 |
| | Retail & Child care | .037:1 |
| | Total | 1.29:1 |
| Car Parking | Seniors Housing | 197 |
| | Child care | 20 |
| | Total | 217 |
| Accommodation Provisions | <ul style="list-style-type: none"> • 227 existing hostel / dementia care beds; • 187 proposed additional hostel beds; • 94 proposed additional special care / dementia beds; and • 36 serviced self care apartments. • 508 total beds and 36 serviced self care apartments (281 total proposed additional beds and 36 self care apartments). | |

2.3 Indicative Project Staging

The PPR has set out staging of construction works as shown in Table 3 below.

Table 3 Indicative Staging of Works

| Stage | Works |
|---|---|
| Stage 1 (within 2 years of Concept Plan approval) | <ul style="list-style-type: none"> Construction of proposed Building D; Construction of temporary car park within the footprint of proposed Building Envelope E; and Arrangements for the relocation of existing uses within existing Building C to allow for future renovation works. |
| Stage 2 (10 years from Concept Plan approval) | <ul style="list-style-type: none"> Construction of proposed Building Envelope E; Addition of upper floor to existing Building C; Renovations to existing Building C and internal reconfiguration; and Construction of the proposed child care centre. |

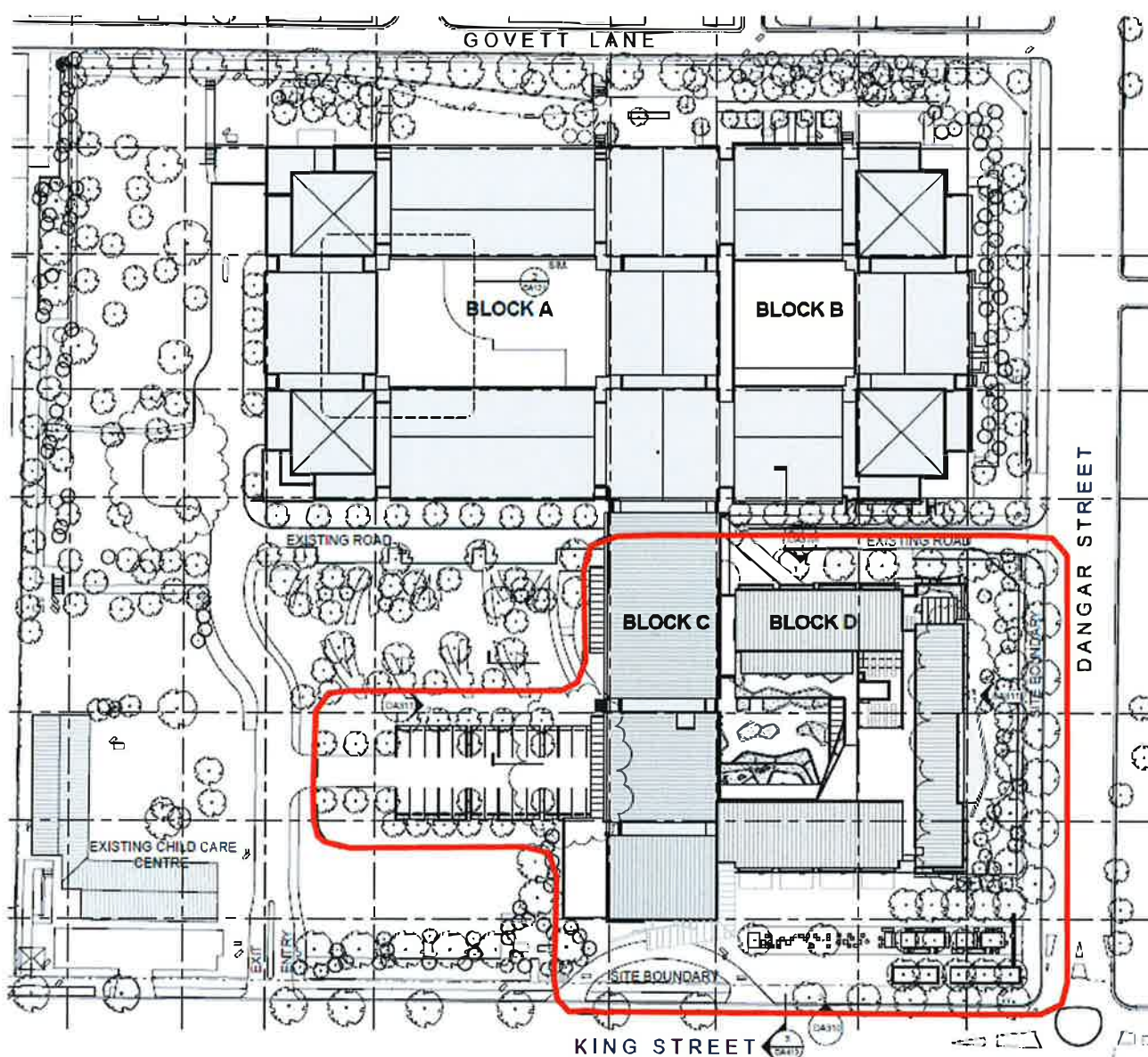


Figure 6: Site layout/extent of Stage 1 works (shown outlined in red) as sought by the Project Application.

2.4 Project Need and Justification

NSW State Plan

The NSW State Plan seeks to achieve improved urban environments and deliver attractive and sustainable development through reductions in greenhouse gas emissions and development in close proximity to existing centres, services and transport.

The proposal represents consolidation of an established area which is zoned for residential development. The proposal will assist in providing residential accommodation for an aging population, which is accessible to public transport and community services and facilities. The proposal is consistent with the aims of the State Plan in terms of providing housing for the State's growing aging population.

The Metropolitan Plan for Sydney 2036

The Metropolitan Plan for Sydney 2036 is a strategic document that guides the development of the Sydney Metropolitan area towards 2036. It sets out housing and employment targets for the Sydney region at 770,000 additional dwellings and 760,000 new jobs by 2036. The Plan further refines Sydney-wide targets for the east sub-region for an additional 23,000 new dwellings and an additional 31,000 new jobs by 2036. The Plan seeks at least 70% of new dwellings to be located within existing urban areas and 80% of new dwellings to be located within walking distance of a centre.

The Plan also highlights the aging Sydney population, estimating that by 2036, one in six people in Sydney will be aged 65 or more, compared to one in eight in 2010.

The proposal is consistent with the aims of the Metropolitan Plan for Sydney 2036, as it will contribute toward meeting overall dwelling targets, locating dwellings within existing urban areas, and in its delivery, provide a number of construction jobs.

Draft East Subregional Strategy

The site falls within the area defined by the Draft East Subregional Strategy. Housing and employment targets for the sub-region have been updated by the Metropolitan Plan as identified above. The Randwick City LGA has a total housing target of 8,400 additional dwellings and an employment capacity target of 5,900 jobs to 2031 within the Draft Subregional Strategy.

The Draft East Subregional Strategy states that over the next 25 years significant aging of the resident population is forecast. Currently 13.5% of the population is aged over 65 years. This figure will grow to 18% by 2031, highlighting the importance of providing more aged care facilities within the subregion.

It identifies that an appropriate location for affordable housing for older people or people with a disability could be close to the nearby Randwick Education and Health Specialised Centre. The subject site is within 1 kilometre from this Specialised Centre which has an area of approximately 3km². It currently contains the University of NSW, Prince of Wales Hospital, Sydney Children's Hospital, Royal Hospital for Women and the Prince of Wales Private Hospital.

The proposal is considered consistent with the aims and objectives of the Draft East Subregional Strategy, contributing towards identified housing targets, specifically catering for an aging population.

3. STATUTORY CONTEXT

3.1. Major Project

The proposal is a major project under Part 3A of the Environmental Planning and Assessment Act 1979 (EP&A Act) because it is development for the purpose of a residential, commercial or retail project with a capital investment of more than \$100 million under clause 13 of Schedule 1 of State Environmental Planning Policy (Major Development) 2005. Therefore the Minister for Planning and Infrastructure is the approval authority.

On 28 May 2011, the Minister for Planning delegated responsibility for the determination of concept plans and project applications under Part 3A of the *Environmental Planning and Assessment Act 1979* to the Planning Assessment Commission where:

- the application is not for major infrastructure development and the proponent is not a public authority (other than a local authority), or
- a statement has been made disclosing a reportable political donation in relation to the project, or
- a statement has been made disclosing a reportable political donation in connection with any previous concept plan or project application.

The project meets the above criteria because the application has attracted more than 25 submissions by way of objection. The Planning Assessment Commission can therefore determine the project under delegated authority.

3.2 Permissibility

The Randwick LEP 1998 identifies the site being located across the following zones:

- Residential B - maximum height 9.5 metres and FSR 0.65:1 (northern and eastern portion); and
- Residential C - maximum height 12 metres and FSR 0.9:1 (south western portion).

An extract of the zoning map is provided below.

The Seniors Living SEPP allows development for seniors housing on land zoned primarily for urban purposes. The proposed seniors housing use is therefore permitted within the Residential B and Residential C zones.

The proposed child care centre use is also permitted within the Residential B and Residential C zones. Development for the purpose of neighbourhood shops, on part of the site at the corner of King and Dangar Streets, is also permitted (to a maximum combined gross floor area of 350m²).

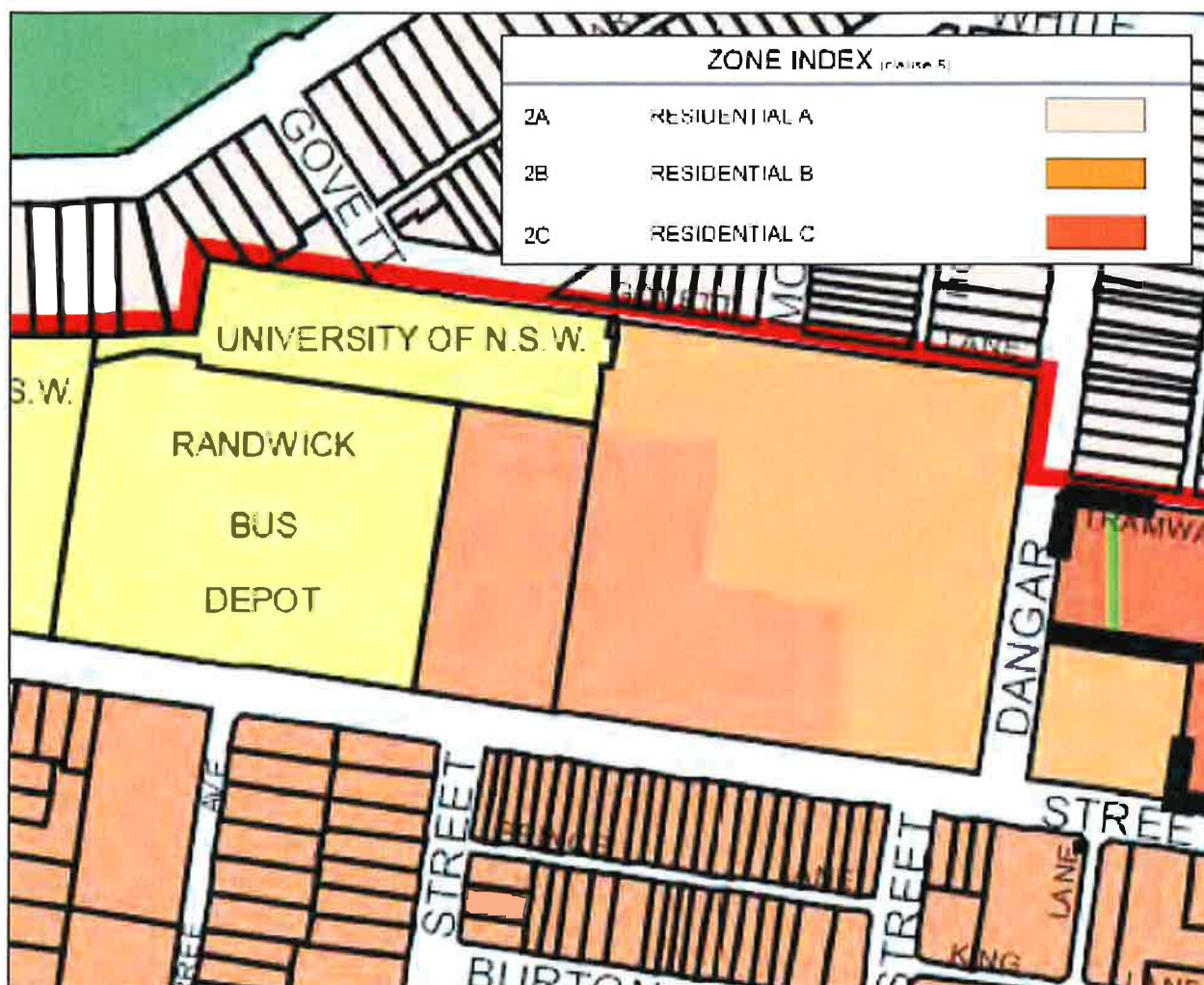


Figure 7: Zoning Map extracted from the RLEP 1998. Note the thick red line along the northern boundary of the site shows the extent of the North Randwick Conservation Area.

3.3 Environmental Planning Instruments

The Department's consideration of relevant SEPPs and EPIs is provided in Appendix D.

3.4 Objects of the EP&A Act

Decisions made under the EP&A Act must have regard to the objects of the Act, as set out in Section 5 of the Act. The relevant objects are:

- (a) *to encourage:*
 - (i) *the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment,*
 - (ii) *the promotion and co-ordination of the orderly and economic use and development of land,*
 - (iii) *the protection, provision and co-ordination of communication and utility services,*
 - (iv) *the provision of land for public purposes,*
 - (v) *the provision and co-ordination of community services and facilities, and*
 - (vi) *the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats, and*
 - (vii) *ecologically sustainable development, and*
 - (viii) *the provision and maintenance of affordable housing, and*

- (b) *to promote the sharing of the responsibility for environmental planning between the different levels of government in the State, and*
- (c) *to provide increased opportunity for public involvement and participation in environmental planning and assessment.*

The proposal is consistent with the relevant objectives of the EP&A Act in that it will facilitate for the orderly development of the site within the built up urban area. It will augment the existing facilities on-site including a range of suitable accommodation and care facilities for seniors and those with disabilities. Also the proposed development is considered to be ecologically sustainable as discussed in the heading below and Appendix D.

3.5 Ecologically Sustainable Development

The EP&A Act adopts the definition of Ecologically Sustainable Development (ESD) found in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of:

- (a) *the precautionary principle,*
- (b) *inter-generational equity,*
- (c) *conservation of biological diversity and ecological integrity,*
- (d) *improved valuation, pricing and incentive mechanisms.*

The project is consistent with the key principles of the ESD. A further detailed assessment against ESD Principles is at Appendix D.

3.6 Statement of Compliance

In accordance with section 75I of the EP&A Act, the Department is satisfied that the Director-General's Environmental Assessment Requirements have been complied with.

4. CONSULTATION AND SUBMISSIONS

4.1. Exhibition

Under section 75H(3) of the EP&A Act, the Director-General is required to make the Environmental Assessment (EA) of an application publicly available for at least 30 days. After accepting the EA, the Department publicly exhibited the proposal from 22 September 2010 until 22 October 2010 then re-exhibited the proposal (as the original resident notification did not include all occupiers of adjoining flat buildings) from 27 October 2010 to 26 November 2010 (total of 62 days) on the Department's website, and at the Department's Information Centre and at Randwick City Council Offices. The Department also advertised the public exhibition in the Sydney Morning Herald, The Daily Telegraph and The Southern Courier newspapers and notified nearby landholders and relevant State agencies and Randwick City Council in writing.

The Application; Director-General's Environmental Assessment Requirements; Environmental Assessment; and Response to Submissions (in Preferred Project Report) were placed on the Department's Website. This satisfies the requirements in Section 75H (3) of the EP&A Act.

The Department received 70 submissions during the exhibition of the EA - 5 submissions from public authorities and 65 submissions from the public and special interest groups.

4.2. Public Authority Submissions

Five public authorities provided submissions in respect of the application.

Randwick City Council provided the following comments:

- Breaches in density and height are at the upper limit that the site can tolerate relative to the existing and future character of the surrounding area.
- The proposed height is significantly increased compared to the height approved under the Master Plan in 2002.
- The proposal is an overdevelopment of the site.
- In view of the overall increase in the height proposed, the development should provide the following:
 - Public domain and landscape treatment along King Street;
 - Increase façade treatment with high quality finishes;
 - Provision of defined landscaped view corridors along King and Dangar Streets;
 - Provision of pedestrian permeability through the site; and
 - Provision of a more integrated typology of open space.
- In relation to the public square:
 - Reduced in size when compared to the Master Plan approval;
 - Is not so much a square but more of an increased setback area and depth should be increased; and
 - The function, form and performance should be in context with the locality.
- Impact on surrounding residential amenity from intensification of use, such as additional staff and child care centre related car parking and traffic.
- Impacts on residential amenity due to light spill and view loss.
- Transport and accessibility.
- Evacuation and emergency response issues and lack of consultation with emergency services providers.
- Late night transportation for female workers.

Randwick City Council (in response to PPR):

- Density – breaches in allowable FSR add to the bulk and scale of the proposal.

- Height – unacceptable 5 storey presentation to King Street.
- Public Square – should be reconfigured to be a more useable open space.
- Parking – remains inadequately addressed and Stage 1 parking is inadequate.
- Traffic – traffic study lacks sufficient detail to analyse traffic impacts.

Transport NSW provided the following comments:

- On site car parking should be reduced to a maximum of 174 spaces in accordance with Randwick City Council's Parking DCP and considered in relation with a Workplace Travel Plan (WTP). The WTP should include:
 - Car pooling and car share spaces;
 - Discounted annual public transport tickets for staff; and
 - Preparation of a Travel Access Guide (TAG) for visitors to the site
- A 28% public transport mode share should be achieved.
- The proposed provision of end of trip facilities are supported and bicycle parking for staff should be provided in convenient and safe locations.

Transport NSW (in response to PPR):

- The PPR has not demonstrated a minimalist approach to car parking;
- The location and quantum of bicycle parking and car share spaces should be provided;
- The parking rates recommended in the Randwick Parking DCP should be applied as a maximum; and
- A further reduction in on-street parking can be achieved through the intended WTP.

Sydney Water Corporation provided the following comments:

- The proposed development provides a wastewater loading that exceeds maximum loading. As such, upsizing of the existing wastewater main from 225mm to 300mm is required along King Street.
- Existing drinking water mains have sufficient capacity for proposal.
- A trade waste permit must be secured by all customers discharging trade waste into Sydney Water's wastewater systems.
- The Proponent is required to obtain a Section 73 Certificate from Sydney Water.

Department Comment: On 14 February 2011, Sydney Water revised the above position confirming that there is no need to upsize the existing wastewater main and that the developer could connect into the existing wastewater main located within the property boundary.

State Transit Authority provided the following comments:

- The proposed development should have in place suitable mitigation measures against noise and light from the Randwick Bus Depot.
- Construction should not interfere with STA School and Special Bus Services running along King Street.

Roads and Traffic Authority provided the following comments:

No objection to the proposal subject to standard traffic and parking design conditions.

4.3. Public Submissions

65 submissions were received from the public which raise various issues as detailed in the table below.

Table 4: Summary of Issues Raised in Public Submissions

| Issue | Proportion of submissions (%) |
|--|--------------------------------------|
| Inadequate on-site parking and increase on-street parking demand | 87% |
| Density / FSR | 84% |
| Height | 74% |
| Traffic impacts | 48% |
| child care centre, numbers and associated activities | 39% |
| Visual bulk impact | 36% |
| Landscaping requirement for north western corner of the site | 26% |
| Solar access / overshadowing (particularly the adjoining Centennial Apartments) | 23% |
| Privacy impacts (particularly to the adjoining Centennial Apartments) | 23% |
| Light spill / Noise (Operational) | 20% |
| Heritage impacts | 15% |
| Loss of open space | 13% |
| Misuse of a residential zone due to operational impacts | 11% |
| Loss of outlook / views to city skyline | 11% |
| Setbacks inadequate | 8% |
| Construction related impacts / Precedent set by development / Non-compliance with SEPP 65 | 7% |
| Public square is inadequate / Existing sewer and stormwater is inadequate / Comparison to previous Masterplan / Retail area is inappropriate | 5% |
| Property values will decline / Not state significant development | 3% |

Two additional public submissions have been submitted since the submission of the PPR, raising the following points:

- The issues of floor space ratio and height have not been addressed through this revised proposal;
- Further exhibition of the amended scheme is requested; and
- The status of the Masterplan needs to be properly clarified.

The Department has considered the issues raised in submissions in its assessment of the project.

4.4 Proponent's Response to Submissions

The Proponent provided a response to the issues raised in submissions within the Preferred Project Report (see **Appendix C**) as described in Section 2.2.

5. ASSESSMENT

The Department considers the key issues for the project to be:

- Built Form
- Amenity Impacts
- Car Parking and Traffic
- Residential Amenity

5.1 Built Form

Concern was raised by the public and Council regarding the extent of the proposed floorspace, both in terms of the height, bulk and scale, and land use intensity. The Department considers that the proposed quantum of floorspace is most appropriately tested through an assessment of:

- density;
- the proposed height and bulk of the built form;
- associated amenity impacts arising from the proposed building such as overshadowing, view loss and privacy impacts; and
- operational impacts such as parking and traffic generation.

These issues are discussed as follows.

Density

The Department has carried out a numerical analysis of the proposed FSR (Table 5 below). This analysis recognises that the 'Vertical Villages' provisions of the Seniors Living SEPP provides a 0.5:1 floor space bonus in addition to the floorspace provisions of the Randwick LEP 1998 (Appendix D). It indicates that across the entire site (i.e. across both the 2B and 2C zones) the proposed floor area exceeds the total allowable floor area of 36,307m² by 1,661m² (or 4.6%).

Table 5: Proposed floor space analysis

| | Area (m ²) | GFA Proposed | FSR proposed | FSR Control (m ²) including FSR bonus Seniors Living SEPP | Compliance |
|---------|------------------------|----------------------|--------------|---|------------------------------|
| 2B Zone | 19,146 | 23,895m ² | 1.25:1 | 1.15:1 (22,017) | No (+1,878m ²) |
| 2C Zone | 10,207 | 14,073m ² | 1.38:1 | 1.4:1 (14,290) | Yes (-217m ²) |
| Total | 29,353 | 37,968m ² | 1.29:1 | 1.24:1*(36,307) | No (+1,661m ²)** |

* this is a composite FSR calculated from the entire allowable GFA across the 2B and 2C zones.

Given the large site area, the Department considers that the 4.6% exceedence from the floorspace provisions of the Seniors Living SEPP is not a significant departure, as some additional floorspace and associated height/bulk is able to be located toward the centre of the site without any material impact to adjoining properties or the public domain. Also, some of the proposed floor space (Level 2 of the proposed Building Envelope D), is provided at an excavated level, which reduces the apparent bulk of the proposed building envelope.

The proposed quantum of floorspace represents a minor non-compliance and is supported as it is acceptable in terms of height, bulk and scale in the context of the surrounding area together with acceptable amenity impacts, as discussed further below.

Height and Bulk of Built Form and Compatibility to Surrounding Locality

The height of the proposed buildings varies given the sloping nature of the site. The maximum proposed building height within the 2C zone is 20.2 metres at the north western extremity of the

proposed Building Envelope E. The maximum proposed building height within the 2B zone is 17.7 metres at the northern part of Building Envelope E. This exceeds the building heights allowed by the Randwick LEP 2005 in each zone by 8.2 metres (the maximum height control is 12 metres in the 2C zone and 9.5 metres in the 2B zone).

The EA argues that the maximum building heights are generally reached toward the centre of the site, in areas out of view and away from the public domain and surrounding development while minimising apparent height and bulk at street frontages.

The PPR amends the proposed building envelopes toward the south western corner of the site (as detailed in Section 2). The Proponent further justifies that the current scheme takes advantage of the FSR bonuses (provided by the Seniors Living SEPP) afforded to aged care developments. The PPR further explains that the proposed heights exceed the LEP controls, primarily because there is no height bonus to correlate with the 0.5:1 FSR bonus when applied in tandem with other numeric controls governing site coverage, landscaping or provision of public domain.

The Department has considered the height and bulk of the proposed building envelopes and their relationship to the existing character of the surrounding neighbourhood particularly in terms of the streetscapes of:

- Dangar Street; and
- King Street

Dangar Street Frontage

Dangar Street is characterised by a variety of building types and forms. This includes:

- The existing 2 storey aged care facility on the western side of the street.
- Single storey dwellings on the eastern side of the street to the north of Tramway Lane.
- 2-3 storey townhouse and apartment style development on the eastern side of the street to the south of Tramway Lane (see Figure 8).
- 4 storey flat buildings on the southern side of King Street and its intersection with Dangar Street (see Figure 8).

The proposal will present a 4 storey façade (RL58.40m parapet height of 13.5 metres with a raised corner feature at the southern end) stepping down to 2 storeys at its northern end along the western side of Dangar Street. Although the proposed 4 storey height exceeds the 2-3 storey development on the eastern side of Dangar Street, it remains lower than the height of the prominent 4 storey flat buildings (RL62.95m) on the elevated lots on the southern side of King Street (see Figures 8 and 10).

The Department considers that the presentation of the proposed façade is an appropriate contextual fit into the visual character of Dangar Street for the following reasons:

- The height of the building sits within the established 2-4 storey height range (as described above) of nearby development.
- The proposed building is setback 10 metres from the street (greater than the general 4-6 metre setbacks on nearby development as required by the Randwick DCP). This is consistent with the existing facility on the northern portion of the site and reduces the apparent height and bulk of the proposed building. It will also allow for substantial landscaping in this setback area to visually soften the bulk of the building as seen from the street.
- The ground floor level (RL44.81m) is up to 1 metre lower than the eastern site boundary along Dangar Street (RL 45.81m – 45.41m) which further reduces the apparent height of the proposed building from the street.
- The architectural detailing provides vertical articulation and a range of materials to provide a lighter weight upper floor to add some visual interest and further reduce the apparent bulk of the building.



Figure 8: Perspective view looking south along Dangar Street. The eastern elevation of the proposed building is shown on the right (western) side of the street.

King Street Frontage

Near its intersection with Dangar Street, King Street is characterised by a variety of built forms along its southern side:

- 4 storey flat buildings to the south-east of the site (as shown in Figure 10 below);
- 1 -2 storey detached and semi-detached dwellings further to the west; and
- 2 storey buildings accommodating retail uses near the intersection of King and Church Street (see Figure 9).



Figure 9: Perspective view looking west along King Street. The south eastern corner of the proposed building is shown on the right (northern) side of the street set behind the proposed public square.

Similar to the Dangar Street frontage, the proposed development will present a 4 storey façade to King Street near its intersection with Dangar Street (with a parapet height at RL58.40m - 13.5 metres and a raised corner feature at the southern end as shown in Figure 9 above). The building is proposed to sit 19.5 metres back from the street frontage behind a public square on the corner of King and Dangar Streets. The proposed public square is complemented by a proposed retail space

and provides paved areas, seating and other street furniture, landscaping and a retail space opening out onto the public square.

The proposed 4 storey façade height is greater than the 1-2 storey development immediately opposite, along the southern side of King Street, however remains lower than the height of the 4 storey flat buildings on the southern side of King Street (see Figures 8 and 10).



Figure 10: View looking east along King Street from the south-eastern corner of the subject site. This part of King Street is characterised by 4 storey flat development.

The Department considers that the presentation of the proposed development is an appropriate contextual fit into the visual character of King Street for the following reasons:

- The height of the proposed facade sits within the 1 – 4 storey height range (as described above) of nearby development.
- The proposed building is setback 19.5 metres (depth of the proposed public square) from the King Street frontage which reduces the apparent height and bulk.
- The architectural detailing provides vertical bays matching the existing subdivision pattern of the residential lots on the southern side of King Street and provides a range of materials to add some visual interest and further reduce the apparent bulk of the building.

The proposed public square presents a new urban design element in the locality. The Department considers that it will provide a positive contribution to the public domain in that:

- It will provide an area for passive recreation purposes for the residents and visitors of the site and also the local community.
- It will provide a public space that is reasonably proportioned having regard to the likely volume of pedestrian use/traffic.
- As envisaged by the site specific controls provided in the RLEP 1998, this space provides an active street frontage at the ground level through the proposed retail space that can be used by the residents and visitors of the site and also the local community.

King Street Frontage – West

This section of King Street is characterised by two distinct forms of development:

- The southern side of the street opposite the subject site is lined with 1-2 storey detached and semi-detached dwellings.
- On the northern side of the street, adjoining the subject site to the west is a more recently developed 4 storey residential flat building (Centennial Apartments), presenting as a 3 storey building to King Street.

The proposed building form will present a 3 storey façade (at RL54.53m) toward its eastern extent (12.25 metres high), becoming a 4 storey façade toward the west (13.25 metres high), as the ground level falls from east to west along King Street. An additional level is proposed above the 3-4 storey façade level that is to be further setback 9.5 metres behind the façade.

The Department considers that the presentation of the proposed 3-4 storey façade to this section of King Street is appropriate for the following reasons:

- The 12 metre building height control for this part of the site and the surrounding area (Res C zone which also applies to the southern side of King Street) accommodates for development of up to 4 storeys.
- The proposed façade generally presents a similar built form as the recently developed neighbouring Centennial Apartments in terms of height, setback and bulk (noting the Centennial Apartments are situated on lower lying land).
- The indicative elevations provided in the PPR show that the façade will provide vertical bays similar to the existing subdivision pattern of the residential lots on the southern side of King Street.
- The mass of the long building form is mitigated by the 10 -19.5 metre setbacks from the street, and the articulation and architectural detailing of the façade, which may be further developed as part of any future application.



Figure 11: Looking east toward the subject site from the southern side of King Street. Whilst the 5th storey is visible at this point it is setback by 19.5 metres from the street and 18 metres from the side boundary to sufficiently reduce any visual bulk impacts. The corner of the adjoining Centennial Apartments building can be seen in the far left of the picture (extracted from PPR).

The proposed 5th storey above the façade is setback sufficiently (9.5 metres behind the façade) so that it will not be readily visible when viewed from ground level directly across King Street. The Department considers that this upper level is acceptable on the basis that it is setback sufficiently behind the 3-4 storey façade. Figure 11 (above) shows that at its western end, a portion of the proposed 5th storey will be visible to King Street. However at this point the building is setback from the front and side boundaries by 19.5 metres and 18 metres respectively to effectively reduce the visual bulk presented to the public domain and the adjoining Centennial Apartments building.

Conclusion

The site is surrounded by a range of detached and semi-detached dwellings and residential flat buildings having a height of between 1-4 storeys. The proposed built form will concentrate its greatest height and mass toward the centre of the site, away from the public domain, while presenting a façade of 2-4 storeys in height with 10 metre setbacks to King and Dangar Streets. The visual bulk of the 5 storey form visible to King Street and the Centennial Apartments is effectively mitigated by the setbacks of 19.5 metres to the street and 18 metres from the side boundary. Also, the proposed architectural detailing provided on the façade will improve the contextual fit of the proposal into the locality. The Department therefore considers that the proposal achieves an acceptable built form for the site and surrounding locality.

5.2 Amenity Impacts to Adjoining Properties

Overshadowing

Concern was raised regarding the overshadowing impacts to the adjoining Centennial Apartments at 90-98 King Street to the west of the site. This property accommodates a 4 storey residential flat building that contains eastern facing apartments on each of the floors. These apartments are oriented slightly south of due-east with recessed balconies above the ground level. The living area windows therefore only receive direct sunlight during the morning hours and would be in full shadow before midday. The apartments at the ground floor level are provided with courtyards within the eastern side setback, which also only have morning sun.

The shadow analysis provided in the PPR demonstrates that at mid-winter, three of the five ground floor apartments and their courtyards would be overshadowed by the proposed development for a short period in the morning. In particular, at 9:00am the proposal overshadows the ground floor apartments. By 9:11am, the proposal will not restrict solar access onto the living area windows, however there will still be some shadow cast onto the courtyards within the side setback area. By 9:15am, however the solar access to these courtyards will be unaffected by the proposal. After this time the only shadowing to this adjoining property will be a result of overshadowing from the Centennial Apartments building itself.

The Department considers this shadowing impact for a maximum of 15 minutes between 9am-3pm at mid-winter to be minor. However, the limited amount of solar access already provided to these apartments means that this minor impact would reduce the amount of solar access to apartments and their courtyards to less than 3 hours. This does not comply with the Residential Flat Design Code which requires a minimum of 3 hours of direct sunlight between 9:00am and 3:00pm at mid-winter.

However, the solar access currently provided to the Centennial Apartments during the morning is maintained by virtue of the fact that the portion of the Montefiore site immediately adjoining these apartments remains substantially underdeveloped to date with only a single storey building containing the existing child care centre. An alternative development of this part of the Montefiore site that is in-keeping with the built form character of Centennial Apartments development and compliant with the Randwick LEP 1998 is likely to also lead to similar overshadowing impacts. This side setback area is therefore vulnerable to being overshadowed given its location, orientation and the likely densities of future development enabled by the Randwick LEP 1998. Noting this, the

Department considers that the minor reduction (15 minutes) to solar access to these 3 ground floor apartments to be acceptable in the circumstances.

View Impacts

The Proponent provided a visual impact analysis of the proposal from properties in the surrounding area. This includes a sightline analysis for elevated properties on the southern side of King Street and the northern side of nearby Burton Street (to the south and south east of the site) toward the CBD skyline to the north-west. This study establishes that a number of properties particularly in King Street enjoy views back across the subject site to the city skyline in the distance beyond.

A consideration of the principles in the Land and Environment Court judgement "*Tenacity Consulting v Warringah Council (2004)*", provides a basis for the consideration and assessment of view impacts, view loss and view sharing, and the criteria adopted in the decision state as follows:

- (i) Assess what views are affected (i.e. whether or not they are iconic views, water views, obscured etc);
- (ii) From what part of the property are the views obtained;
- (iii) The extent of the impact; and
- (iv) The reasonableness of the proposal which is causing the impact.

(i) Views which are affected

A number of properties on elevated land on the southern side of King Street (see Figure 10) and also on the northern side of Burton Street enjoy a range of interrupted and uninterrupted distant views across the site to the CBD skyline in the north-west and Bondi Junction to the north.



Figure 12: Looking north-west from the rear upper floor balcony (off bedroom) from a residence in Burton Street. The city CBD skyline can partially be seen in the distance from this vantage point. The existing aged care facility is identified within the red oval.

(ii) From what part of the property are the views obtained

For properties in Burton Street, views (see Figure 12) are enjoyed principally from rear (north) facing upper floor bedrooms, living areas and balconies and provide partial views to the CBD skyline. Front facing rooms and balconies of the apartment buildings on King Street enjoy more uninterrupted views from front facing living areas, bedrooms and balconies.

(iii) Extent of impacts

The view impact analysis provided in the Proponent's PPR and on-site observations indicates that generally the proposal will have a negligible impact on existing views from the identified higher vantage points to the CBD skyline. The most significant impact on views occurs at the level

RL56.6m (which is equivalent to the mid-level of the Regent apartments as shown in Figure 10) where the proposal will begin to block the lower portion of the skyline, however the upper most part of the skyline would remain visible which includes landmark buildings such as the Centre Point Tower. The Department considers these impacts to be minor.

(iv) The reasonableness of the proposal which is causing the impact

The Proponent argues that the view impacts are minimal and acceptable given the few apartments affected and the degree of distant CBD views retained or at worst marginally affected.



Figure 13: Visual impact analysis provided by the Proponent showing impacts to King Street vantage point at RL 56.6m. The green section provides a silhouette of the proposed building form against the skyline. The analysis shows that the view impact will be minor.

The Department agrees with the Proponent in that the minor view loss impacts from a small number of properties to distant CBD skyline views to be insufficient to warrant refusal or any further modification of the application.

Privacy

As described above, the western section of the proposal is located nearby the adjoining Centennial Apartments. A number of concerns have been raised by the residents of this property about the potential visual privacy impacts.

The Proponent has amended this section of the proposed Concept Plan in the PPR by providing a greater setback to the western common boundary (see Figure 14), the western facing elevation is now proposed to be setback 14 metres from the western side boundary. This provides a total separation distance of 22.5 metres between the existing and proposed buildings. In addition to this amendment, the Proponent highlights that a number of further privacy mitigation measures are provided:

- provision of a 3 metre wide planted buffer zone between the western boundary and the relocated child care centre;
- the addition of a 'green roof' to the child care centre, providing for an increased landscape screen;
- replacing the balconies on the high care floors (shown as levels 3 and 4 in Figure 13 below) with non-accessible planter boxes; and
- providing balustrades that are designed to limit views down, but still allow for horizontal views and light penetration for the proposed building.

The Department has considered visual privacy between the proposed residential building and the nearby Centennial Apartments. The two buildings are set apart by 22.5 metres which exceeds the separation requirement provided by the RFDC of 12 metres at levels 1-4 and 18 metres above that level. It is noted that the ground floor apartments of the Centennial Apartments have courtyards within that space however the Department considers that the additional privacy mitigation measures as described above ensure a reasonable level of privacy will be maintained to this

space. It is therefore considered that the proposed design will maintain adequate privacy to the Centennial Apartments. These privacy measures may be further considered as part of any future application.

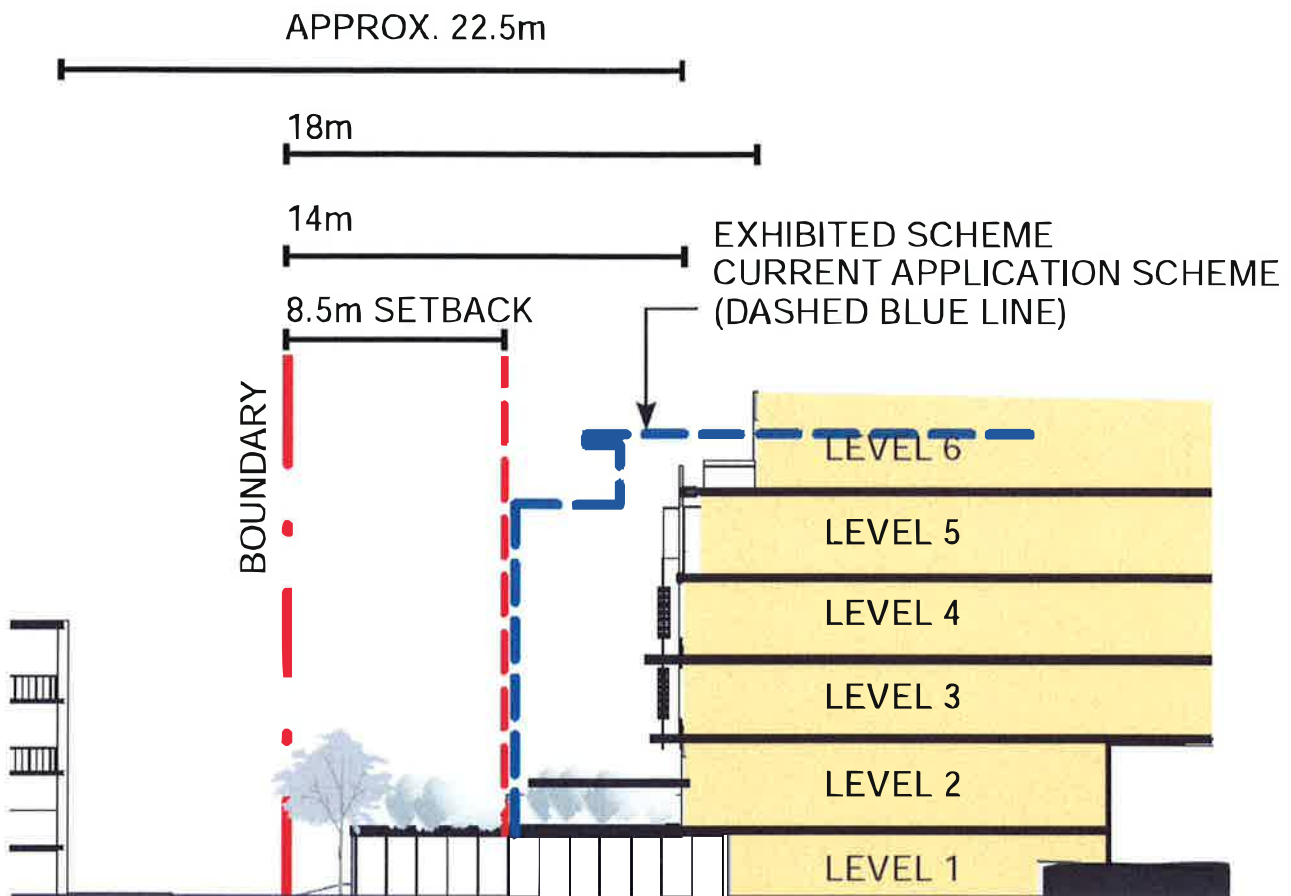


Figure 14: Section diagram showing the separation distance between the western extent of proposed Building Envelope E and the adjoining Centennial Apartments to the west. This image also shows the outline of the originally exhibited scheme as indicated by the dashed blue line.

Child Care Centre and Play Area

The proposed reconfiguration of the existing child care centre and the possible intensification of its use has drawn concern in a number of public submissions. In the PPR, the Proponent has clarified that the centre operates independently of the aged care facility and presently has Council approval for 80 child care places (issued for a 5 year period on 22 October 2010) and is operating accordingly.

The Concept Plan seeks approval for the redesign of the existing centre including an increase in floor space by 310m² to 757m², however does not seek approval for a specific number of child care places. The PPR also presents a number of changes to the originally proposed child care centre and its associated play area in response to the concerns raised:

- the play area has been redesigned to minimise the amount of external play space fronting the Centennial Apartments to the west;
- provision of a 3 metre wide landscape buffer between the child care centre and the Centennial Apartments to improve visual and acoustic privacy (in tandem with a 1.8 metre high dividing wall);
- a green roof has been provided on the child care centre; and
- a dedicated off-street pick-up/drop-off area with 14 parking spaces and separate off-street staff parking for 6 vehicles is provided.

The Department considers that the proposed reconfiguration will improve the operation and design of the child care centre in relation to the potential for amenity impacts to the locality. In particular:

- the provision of 20 off-street parking spaces will better accommodate the parking demand, as compared to the current 6 off-street parking spaces and the on-street short stay (15 minute) area; and
- the proposed layout insulates the centre and its associated noise impacts from the adjoining residential properties with a 3 metre deep landscape buffer and locates the play area adjacent to the communal open space area in the adjoining property rather than any living areas or windows.

The Department is supportive of the proposed reconfiguration of the existing child care centre for the above reasons. Given that the PPR has based its assessment on 80 child care places being provided it is recommended that this figure be reflected in the Concept Plan approval.

5.3 Car Parking and Traffic

On-Site parking

A large number of public submissions and Council's submission raise concern with the likely increase in demand for on-street parking as a result of the proposed development. In raising this concern, many of these submissions highlight that a proportion of the existing staff at the aged care facility currently rely on on-street parking. As such, more on-site parking should be provided to ease pressure on the limited supply of on-street parking. Conversely, Transport NSW recommend that a more minimalist approach to on-site parking be taken and recommend that on-street parking demand can be limited through measures such as providing a Workplace Travel Plan.

As an initial response to the issue of on-street parking pressure, the Traffic and Transport Assessment carried out by Halcrow MWT details that an analysis of June 2009 parking surveys of staff/volunteer travel and parking behaviour indicated that 20% of staff parked on-street rather than on-site, despite available on-site parking. The main reason for staff parking on-street was a lack of access to the site. Montefiore management has since changed the access policy including the issue of swipe cards to staff and volunteers, so that staff can readily access parking. Follow up surveys carried out concluded that these measures resulted in a decreased demand for on-street parking by people associated with the aged care facility.

The table below summarises the proposed car parking against the requirements set by the Seniors Living SEPP, the Randwick DCP 1998 and RTA guidelines for traffic generating development.

Table 6 On-site car parking compliance table.

| | SEPP/DCP/RTA rate | Required Number | | Proposed | Complies |
|--------------------------------|---|-----------------|-------|----------|----------|
| Aged Care Facility (per bed) | 1 visitor space per 10 beds | 51 | 185.5 | 197 | Yes |
| Aged Care Facility (per staff) | 1 space per 2 staff | 101 | | | Yes |
| Self contained dwellings | 0.5 spaces per bed | 33.5 | | | Yes |
| Childcare | 0.25 spaces per child | 20 | | 20 | Yes |
| Retail Space | 1 space per 40m ² GFA for the first 80m ² then 1 space per 20m ² thereafter (350m ²) | 15.5 | | 0 | No |
| Total | | 221 | | 217 | No (-4) |

The parking provided for the aged care facility exceeds the numerical SEPP/DCP requirements by 11.5 spaces. There is however a marginal numerical shortfall of 4 on-site spaces when considering all of the uses sought by the Concept Plan, as no dedicated parking for the proposed retail/café space is specifically accommodated.

The Proponent has not addressed the car parking requirements for the proposed cafe. The Department however notes that this café is situated within the context of the Montefiore facility

which is provided with 197 parking spaces. It is likely that a large proportion of the patrons would be residents of and visitors to the facility, and also residents of the nearby area who are within walking distance. As such the Department considers that parking demand would be partly met by the visitors and residents spaces already provided on-site and also would be further reduced as many patrons would arrive on foot. For these reasons the Department considers that the requirement to provide 15.5 additional parking spaces to be unnecessary and that the proposed on-site car parking will be adequate for the café.

The Stage 1 component of the proposed development will provide a total of 170 on-site parking spaces for the aged care facility. The Department has calculated the required number of spaces for the Stage 1 works sought by the Project Application to be 133.5, as provided by the above planning policies and guidelines. The Department considers that this proposed car parking supply for the proposed Stage 1 works as adequate.

Further to the above parking rate analysis, Halcrow has carried out a demand based parking assessment using site specific data such as current staff travel and parking patterns to and from work to calculate the likely parking demand for the development. The modelling concludes that 1.1 on-site car parking spaces should be provided for each day staff member (188 day staff) resulting in a likely demand of 207 on-site spaces, which exceeds the 197 proposed (by 4.8%). This is however not a significant difference and this model assumes that there will be no changes to existing travel behaviour or management parking arrangements.

Halcrow has proposed that a Green Travel Plan (or Workplace Travel Plan) be developed and implemented as part of the proposed development. The main objective of the Green Travel Plan is to implement measures which change travel behaviour to achieve a further 8% increase of mode share to public transport by encouraging and enabling 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.

The Department considers that the anticipated reduction in private vehicle dependency via the implementation of the Green Travel Plan will allow the shortfall of demand based parking to be met. This approach is in accordance with the recommendations of Transport NSW.

The Department considers that the total proposed 217 on-site parking spaces together with the proposed Green Travel Plan achieves the appropriate balance with regard to local planning controls, RTA guidelines, the recommendations of Transport NSW and the maintenance of appropriate levels of availability of on-street parking for neighbouring properties and other uses in the area.

Traffic Generation and Local Road Network

The site is currently provided with the following vehicular access points:

- main driveway onto King Street;
- driveway onto Dangar Street;
- porte cochere driveway onto King Street; and
- driveway to childcare centre car park on King Street.

The proposed Concept Plan seeks the reconfiguration of the vehicular access for the child care so that a separate entry and exit point onto King Street will be provided. Apart from this change the existing access points are proposed to remain.

A concern was raised in a number of public submissions regarding the impacts of the additional traffic generation created as a result of the scale of the proposed development.

The EA documents were accompanied by a Traffic and Transport Assessment prepared by Halcrow MWT. This modelled the existing traffic conditions around the site by undertaking a traffic survey, finding that the site access points on King and Dangar Streets and the King/Dangar Street intersection are currently operating at Level of Service (LoS) A. In general terms, these intersections are operating satisfactorily with significant spare capacity.

Halcrow has provided a modelled analysis of the additional traffic generation created by the proposed Concept Plan which forecasts that:

- There will be an additional 56 trips (37 in/19 out) in the morning peak (8:00-9:00am) ; and
- There will be an additional 62 trips (22 in/40 out) in the afternoon peak (3:00-4:00pm).

Halcrow forecast that surveyed intersections would continue to operate at good Levels of Service (as they currently do) during both peak periods under post development conditions.

The above analysis sets out that traffic generation will have an acceptable impact on the local road network in terms of capacity. It is also noted that the RTA has not raised any issue with traffic or traffic related impacts to the local or regional road network.

The Department has also given consideration to the potential amenity impacts to the locality as a result of the additional traffic generation and notes the following points:

- The existing locality is in close proximity to a number of non-residential land uses which have some effect on existing traffic conditions such as the University of NSW, TAFE NSW Randwick campus, Sydney Buses Depot Randwick and Randwick Racecourse.
- There will only be an additional 1 trip per minute (on average) during the am and pm peak periods.
- The pick-up / drop-off area for the proposed child care centre will better cater for off-street loading and unloading than the existing informal / on-street arrangement and will thus improve on-street traffic conditions.

Having regard to the above, the Department is satisfied that the additional traffic generated by the proposed Concept Plan once fully developed is acceptable both in terms of the capacity of the local and regional road network and the amenity of the nearby residents.

5.4 Residential Amenity

The amenity of self contained dwellings occupying the upper two levels of Building E (and the western side of level 2) proposed by the Concept Plan has been reviewed with regard to the Residential Flat Design Code (RFDC). The RFDC sets out a number of guidelines which detail standards for residential flat development that would ensure the development complies with the intent of the RFDC.

The self contained dwellings form part of the Concept Plan approval only and the Department notes that a full detailed assessment against the RFDC will be made during the assessment of the future stage. Also, the Department notes that the RFDC guidelines need to be considered in conjunction with the specific design standards for circulation and access for occupants contained within the Seniors Living SEPP which require level access to services and additional internal circulation requirements. Further, design options for the self contained dwellings as contemplated in the RFDC (such as units clustered around central access cores) may be limited as they are designed to be a functional and integral part of the larger existing aged care facility that connects the dwellings with a wide range of services and health facilities within the site.

The Department's assessment of the RFDC guidelines is included within **Appendix D**. Variations to the guidelines are discussed below.

Solar Access

The RFDC recommends that 70% of apartments are to receive at least 3 hours of sunlight to living spaces and private open spaces at mid-winter between 9.00am and 3.00pm. The Proponent states that 77% of apartments will receive this amount of sunlight. The Proponent has stated that the figures provided are indicative only and that solar access for the future stage will be resolved prior to future applications being lodged with Council.

The Department's assessment of the plans indicates that a minimum of 64% of the apartments will receive this amount of sunlight, representing a minor non-compliance with the guideline. The Department's review of the indicative layouts however suggest that 75% of the apartments are capable of receiving three hours of sunlight between 9:00am and 3:00pm at mid winter, if the upper level access corridor on the south side of the building is designed in such a manner to allow sunlight to pass through to the four adjacent apartments. Opportunity for this design solution may be reviewed in detail as part of the assessment against SEPP 65 requirements of any future application.

Single Aspect Apartments

The RFDC recommends that the number of single aspect apartments with a southerly aspect should be limited to no more than 10% of the total apartments. Up to 30% of the proposed apartments (11 out of 36) are shown to be single aspect south facing apartments. This outcome is primarily a result of the southern orientation of the footprint of Building E in relation to the existing aged care facility on the northern portion of the site. The apartment planning is also dictated by the functional requirement for the aged care facility to provide the continuous circulation service corridor which occupies large sections of space adjacent to the apartments.

It is considered that performance of the building can be improved through design. For example, the access corridors along the south side of the building and the associated circulation areas may be re-designed in a manner to allow sunlight and natural ventilation to a greater number of apartments. Opportunity for this design solution may be reviewed in detail as part of the assessment against SEPP 65 requirements of any future application.

Natural Cross Ventilation

The RFDC recommends that 60% of units should be naturally cross ventilated. Only 22% (8 out of 36) apartments are corner apartments with natural cross ventilation. The Department has reviewed the indicative design and layouts of the single aspect apartments and notes they provide spacious open plan living areas with large sections of external openings onto balconies and windows facing two sides (i.e. N and E facing windows) of living areas which will afford good natural ventilation to these apartments.

Full cross ventilation is not achievable due to the functional requirement for the aged care facility to provide the continuous circulation service corridor between the apartments and the remainder of the facility, which occupies large sections of space adjacent to the apartments. However, the Department considers that there is scope to re-design these access ways at these upper levels in a manner that allows for natural ventilation through to all of the apartments. Opportunity for this design solution may be reviewed in detail as part of the assessment against SEPP 65 requirements of any future application.

Conclusion

Overall it is considered that the proposal will provide a high quality environment for residents as the self care units largely comply with the RFDC guidelines as shown in **Appendix D**. The apartment design responds to the function and design of the larger aged care facility on the site which also affords the residents with communal areas and public open space for their enjoyment located within close proximity to public transport.

5.5 Other Issues

Other issues considered in the assessment include;

| Issue | Consideration |
|----------------------------------|---|
| Light spill from facility | The proposed development is provided with significant setbacks to adjoining residential properties with the nearest residential building being 22.5 metres (The Centennial Apartments) from the proposed building. The Department considers that this is sufficient separation to mitigate any light spill impacts. A condition is provided on the recommended project approval to protect adjoining residential properties from any light spill. |
| Heritage | The proposed buildings are located on the southern side of the Montefiore site, well away from the part of the site that lies adjacent to the North Randwick 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 no material impact on the heritage conservation area located to the north of the site. |
| Noise | The recommended approval has been provided with operational conditions to ensure that the amenity of nearby residences are reasonably protected against any potential operational noise impacts such as noise from plant and restrictions on delivery times. |
| Contamination | The EA provides a Site Contamination Review prepared by Cetec. The report concludes that the site is suitable for its intended use, subject to further investigation and remediation works. Accordingly the proposal satisfies the requirements of SEPP 55. A condition is recommended to ensure the recommendations of the Cetec report are followed. |
| Contributions | The Randwick Section 94A Development Contributions Plan allows for exemptions to development levies for seniors living developments. The Department considers that it is reasonable that the development be exempted from the normal 1% Section 94A development contributions given the public benefits provided by the proposed aged care facility as recognised by the Seniors Housing SEPP and the Draft East Subregional Strategy. |

6. RECOMMENDATION

The Department has assessed the merits of the proposal taking into consideration the issues raised in public submissions and is satisfied that the impacts have been addressed in the PPR, the revised Statement of Commitments and recommended conditions. It is considered that the impacts can be suitably mitigated and/or managed to ensure a satisfactory level of environmental performance, pursuant to Section 75J of the Act.

The Department considers that the proposed development is an appropriate site specific response to the increased demand for aged care places in existing built up areas of inner Sydney. This demand is recognised by the Seniors Living SEPP and the Draft East Subregional Strategy which identifies a significant need within the area to provide different housing forms to promote 'ageing in place'.

The Department has considered the proposal within the context of the established need for this form of development with its associated public benefits through various levels of aged care including self-care to high level dementia care services in the proposed facility. Ultimately the Department considers that this proposal provides a socially desirable outcome as it falls within matters arising from the broad public interest.

In addition to the above, the Department has determined that the form of the proposed development is appropriate as it fits within the context of the locality. The main amenity impacts arising from the proposal are the overshadowing to the western adjoining Centennial Apartments and the loss of north-western views from the residences in Burton and King Streets. However, these impacts are considered to be minor and do not reasonably form the basis for refusal or any further modification of the proposal.

In addition, the implications for traffic and parking in the nearby area are also considered to be minor, and can be effectively managed by the proposed on-site parking and impacts mitigated via the proposed implementation of a Green Travel Plan.

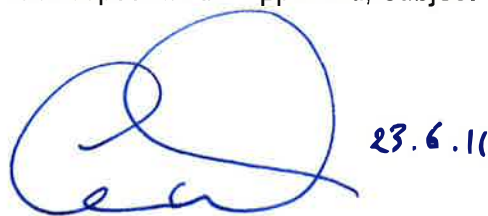
The Department recommends that the Project Application and Concept Plan be approved, subject to the conditions/modifications of approval.



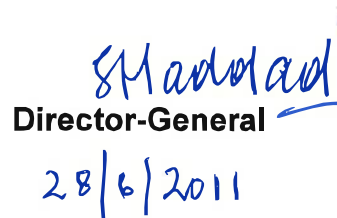
Director
Metropolitan and Regional Projects South



Deputy Director-General
Development Assessment & Systems Performance



Executive Director
Major Projects Assessment



Director-General

APPENDIX A ENVIRONMENTAL ASSESSMENT

See the Department's website at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=3603

APPENDIX B SUBMISSIONS

See the Department's website at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=3603

APPENDIX C PROPONENT'S RESPONSE TO SUBMISSIONS

See the Department's website at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=3603

APPENDIX D CONSIDERATION OF ENVIRONMENTAL PLANNING INSTRUMENTS

ECOLOGICALLY SUSTAINABLE DEVELOPMENT

There are four accepted ESD principles:

- (a) *the precautionary principle,*
- (b) *inter-generational equity,*
- (c) *conservation of biological diversity and ecological integrity,*
- (d) *improved valuation, pricing and incentive mechanisms.*

The Department has considered the development in relation to the ESD principles and has made the following conclusions:

Precautionary Principle – It is considered that there is no threat of serious or irreversible environmental damage as a result of the proposal. The site has been developed for some time and does not contain any threatened or vulnerable species, populations, communities or significant habitats. The site therefore has a low level of environmental sensitivity.

Inter-Generational Principle – The proposal represents a sustainable use of the site as the redevelopment will utilise existing infrastructure and make more efficient use of the site. The redevelopment of this site will also have positive social, economic and environmental impacts.

Biodiversity Principle – Following an assessment of the Proponent's EA it is considered with appropriate certainty that there is no threat of serious or irreversible environmental damage as a result of the proposal. The site has been developed for some time and the site has a low level of environmental sensitivity. There is little to no natural vegetation on the site and the site does not contain any threatened or vulnerable species, populations, communities or significant habitats. Therefore the proposal will not impact upon the conservation of biological diversity or ecological integrity.

Valuation Principle – The approach taken for this project has been to assess the environmental impacts of the proposal and identify appropriate measures to mitigate adverse environmental effects and maximise energy efficiency through design. The mitigation measures include the cost of implementing these measures in the total project cost. The Proponent is committed to ESD principles and has reinforced this through maximizing cross ventilation, solar access and natural light through apartments in the modified PPR proposal. The above measures will be included in the total cost of the project and considering greenhouse gas emissions linked to environmental performance, accessibility and travel the proposal is considered to be acceptable. A condition of consent will be imposed on the development approval to ensure that future buildings developed as part of stage 2 are to achieve the appropriate sustainable development benchmark rating applicable at the time of development.

SECTION 75I(2) OF THE ACT & CLAUSE 8B OF THE ENVIRONMENTAL PLANNING AND ASSESSMENT REGULATION 2000

The DG's report to the Minister for the proposed project satisfies the relevant criteria under Section 75I of the Act as follows:

| Section 75I(2) criteria | Response |
|--|---|
| Copy of the Proponent's environmental assessment and any preferred project report. | The Proponent's EA and PPR are located on the Department's website www.planning.nsw.gov.au |

| | |
|---|--|
| Any advice provided by public authorities on the project. | A summary of the advice provided by public authorities on the project for the Minister's consideration is set out in Section 4 of this report. |
| Copy of any report of the Planning Assessment Commission. | No review has been required to be carried out by the Planning Assessment Commission |
| Copy of or reference to the provisions of any State Environmental Planning Policy that substantially govern the carrying out of the project. | Each relevant SEPP that substantially governs the carrying out of the project is identified in within this Appendix below. |
| Except in the case of a critical infrastructure project – a copy of or reference to the provisions of any environmental planning instrument that would (but for this Part) substantially govern the carrying out of the project and that have been taken into consideration in the environmental assessment of the project under this Division. | An assessment of the development relative to the prevailing environmental planning instrument is provided later in this Appendix. |
| Any environmental assessment undertaken by the Director General or other matter the Director General considers appropriate. | The environmental assessment of the project application is this report in its entirety. |
| A statement relating to compliance with the environmental assessment requirements under this Division with respect to the project. | The environmental assessment of the project application is this report in its entirety. |

The DG's report to the Minister for the proposed project satisfied the relevant criteria under Clause 8B of the EP&A Regulation as follows:

| Clause 8B criteria | Response |
|---|---|
| An assessment of the environmental impact of the project | An assessment of the environmental impact of the proposal is discussed in Section 5 of this report. |
| Any aspect of the public interest that the Director-General considers relevant to the project | The impact of the development on the public interest is discussed in Sections 2, 5 and 6 of this report. |
| The suitability of the site for the project | On 14 August 2009 the Department issues a Site Compatibility Certificate for a previous iteration of the design for the proposal. The certificate in part certified that the site is suitable for more intensive development and allowed the application of an FSR bonus for a residential aged care facility on the site. The development is consistent with the zoning and the site is considered suitable for the senior's housing development |
| Copies of submissions received by the Director-General in connection with public consultation under Section 75H or a summary of the issues raised in those submissions. | A summary of the issues raised in the submissions is provided in section 4 of this report. |

ENVIRONMENTAL PLANNING INSTRUMENTS (EPIs)

To satisfy the requirements of section 75I(2)(d) and (e) of the Act, this report includes references to the provisions of the environmental planning instruments that govern the carrying out of the project and have been taken into consideration in the environmental assessment of the project.

The primary controls guiding the assessment of the proposal are:

- State Environmental Planning Policy (Major Development) 2005;
- State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (Seniors Living SEPP);

- State Environmental Planning Policy No. 65 – Design Quality of Residential Flat Development and the Residential Flat Design Code (Planning NSW, 2002); and
- Randwick LEP 1998 and DCP No. 18.

Other controls to be considered in the assessment of the proposal are:

- State Environmental Planning Policy (Infrastructure) 2007; and
- State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004.

The provisions of development standards of local environmental plans are not required to be strictly applied in the assessment and determination of major projects under Section 75R Part 3A of the Act. Notwithstanding, the objectives of the above EPIs, relevant development standards and other plans and policies that govern the carrying out of the project are appropriate for consideration in this assessment in accordance with the DGRs.

COMPLIANCE WITH PRIMARY CONTROLS

State Environmental Planning Policy (Major Development) 2005

As discussed previously in Section 3.1, on 4 December 2009, the Deputy Director-General formed the opinion that the proposal for a residential aged care facility, including ancillary uses and services at 100-120 King Street and 30-36 Dangar Street, Randwick is a project to which Part 3A applies. The project is a Major Project under *State Environmental Planning Policy (Major Development) 2005*.

State Environmental Planning Policy (Housing for Seniors or People with a Disability 2004) (Housing for Seniors SEPP)

| Key Principles of the Seniors Housing SEPP | Department Response |
|--|---|
| Part 1A Site Compatibility Certificates | |
| Clause 24 Site compatibility certificates A site compatibility certificate is required for any DA that involves a bonus under the Vertical Villages Provisions of the SEPP | On 14 August 2009, a site compatibility certificate was granted for a previous iteration of the design for the proposal. The certificate in part certified that the site is suitable for more intensive development and allowed the application of an FSR bonus for a residential aged care facility on the site. |
| Part 2 Site Related requirements | |
| Clause 26 Location and access to facilities 400m to community facilities or regular public transport. | Some facilities will be provided on site or within 400m of the site. Regular public transport is provided within 400m of the site. |
| Clause 28 Water and sewer Consent authority must be satisfied that the housing will be connected to a reticulated water system and have adequate sewage disposal. | Sydney Water has confirmed in writing that the development may adequately be provided with a reticulated water system and adequate sewage disposal. |
| Part 3 Design requirements | |
| Clause 33 Neighbourhood amenity and streetscape | The proposal is acceptable in this regard as discussed in detail in Section 5.1 of the report. |
| Clause 34 Visual and acoustic privacy | The proposal is acceptable in relation to visual and acoustic privacy as discussed in Section 5 of the report. |
| Clause 35 Solar access and design for climate | The proposal is acceptable in relation to the maintenance of solar access to neighbouring properties as discussed in detail in Section 5.2 of the report. |
| Clause 36 Stormwater | A Stormwater Design Report has been prepared by Emerson Associates and concludes that the proposed stormwater system |

| | |
|---|--|
| | will at all times be consistent with Council requirements. |
| Clause 37 Crime Prevention | <p>The design has been assessed against the principles of "<i>Crime Prevention Through Environmental Design</i>".</p> <p>The proposal provides opportunities for passive surveillance, as well as controlled secure access to car parking and dwellings.</p> <p>The development incorporates measures including controlled pedestrian and vehicular entries, inconspicuous fencing and gates controlling access throughout the site, and intercom entry systems. These measures will adequately address crime issues.</p> |
| Clause 38 Accessibility | The proposal includes several vehicle and pedestrian entries, separated to ensure pedestrian safety. The access points will provide easy access into and out of the site. |
| Clause 39 Waste Management | Waste and recycling facilities are located within the basement and service areas of the complex. |
| Part 4 Development Standards | |
| Clause 40 Development Standards Minimum lot size 1000m ² Minimum frontage of 20 metres | Site area 29,353m ² Frontages 164.5 m (King Street) & 78.5m (section facing Dangar Street) |
| Clauses 41 & 42 Standards for hostels and serviced self-care housing | A condition has been recommended within Appendix F requiring compliance with all relevant sections of Schedule 3, Part 1. |
| Part 6 Development for Vertical Villages | |
| Clause 45 Vertical Villages A bonus 0.5 may be added to the GFA of a seniors living development on land which development for the purposes of residential flat buildings is permitted On-site support services must be delivered for residents. At least 10% of dwellings will be set aside as affordable places. | <p>Randwick LEP permits multi-unit housing within the Residential B and Residential C zones. As stated above, a site compatibility certificate has been issued for a previous iteration of the design for the proposal.</p> <p>The proposed facility is intended to provide a comprehensive range of on site aged-care support services for residents.</p> <p>The Proponent advises that residents unable to pay the full cost of their accommodation are subsidised. Currently 12% of residents who are on 'very low income' have their rent waived. The proportion of 'very low income' residents is maintained at a minimum of 10%. The existing operation therefore meets the requirement of a minimum of 10% of residents not paying more than 30% of their income on rent. The Proponent advises that this proportion of subsidised residents will be maintained in the new accommodation proposed. A condition and future assessment requirement is recommended within Appendix F requiring that this provision be maintained.</p> |

State Environmental Planning Policy No. 65 – Design Quality of Residential Flat Development and Residential Flat Design Code

SEPP 65 seeks to improve the design quality of residential flat development through the application of a series of 10 design principles. A Design Verification Statement has been provided by Jackson Teece Architects, stating that the subject development has been designed having respect to the design quality principles. The Department has considered the architect's design verification statement regarding an assessment of the proposal against the SEPP 65 design principles and considers this to be acceptable.

The Department has reviewed the indicative orientation and layout of the proposed self care units and considers that the proposed development generally complies with the recommendations of the Residential Flat Design Code (RFDC) and that the proposed self care units have the ability to meet the requirements of SEPP 65. An assessment of the proposal against the Residential Flat Design Code is set out in the table below:

| | RFDC requirement | Proposed | Complies? |
|--|---|---|---|
| Part 1 Local Context | | | |
| Building Separation (habitable rooms & balconies) | 12m between habitable rooms/balconies | 16m | YES |
| Street Setbacks | Compatible with desired streetscape character | Minimum 10m setbacks to all boundaries | YES |
| Part 2 Site Design | | | |
| Deep Soil Landscaping | Min 25% of open space | 73% of open space deep soil landscaping | YES |
| Fences | Provide privacy and security Contribute to public domain | Fences to be provided as existing with gated access | YES |
| Communal Open Space | Larger and brownfield sites potential for >30% | 51% communal open space | YES |
| Part 3 Building Design | | | |
| Building Depth | No greater than 18 metres (glass line to glass line) | Maximum 18 metres | YES |
| Acoustic Privacy | Separate noisier spaces from quieter spaces | Internal layout is indicative only at this stage. Units are capable of achieving acoustic privacy requirements. | YES |
| Solar Access | 70% achieve 3hrs of sunlight between 9am-3pm on 21 June | 64-75% | Performance is dependent on future project design solution – discussed in Section 5 above |
| Single aspect units | Limit single aspect units with a southerly aspect to a maximum of 10% of proposed units. | 30% of units are single aspect and facing south | Performance is dependent on future project design solution – discussed in Section 5 above |
| Single aspect apartment depths | Single aspect apartments limited in depth to 8 metres from a window and that a kitchen should be no more than 8 metres from a window. | 8 metres maximum depth | YES |
| Naturally cross ventilated | Min 60% of units | 100% of units are capable of being cross ventilated subject to future detailed design | YES |

| | | | |
|--|--|---|------------|
| | | solutions | |
| Kitchens with natural ventilation | Min 25% | >25% | YES |
| Apartment Size (min)- | 1 bedroom= 50m ² 2 bedroom= 89m ² | 1 bed = 64m ² - 110m ² 2 bed=114m ² | YES YES |
| Balcony Depth | Min 2m | Yes | YES |
| Floor to ceiling heights | ≥2.7m | All units are capable of compliance | YES |

The Department considers that the proposed building configuration enables the proposed units to be provided with a good level of internal amenity. As Concept Plan approval is sought for an indicative built form only, it is considered that detailed design considerations under SEPP 65 and the RFDC will be more appropriately assessed at future project/development application stages.

Randwick LEP 1998

The proposal has been considered against the Randwick LEP 1998. The main areas of non-compliance relate to building height and floor space. These issues have been addressed in the report above. Below is compliance table in relation main planning controls in the Randwick LEP 1998.

| | Control | Proposed | Compliance |
|--------------------------|--|---|------------|
| FSR | Zone 2B 0.65:1 Zone 2C 0.9:1 | Zone 2B 1.25:1* Zone 2C 1.38:1* | No |
| Building Heights | Zone 2B 9.5 metres Zone 2C 12 metres | Zone 2B 17.7 metres Zone 2C 20.2 metres | No |
| Wall Heights | Zone 2B 7 metres Zone 2C 10 metres | Zone 2B 14.8 metres Zone 2C N/A** | No |
| Landscaped Area | 50% of site area minimum Landscaped area over podiums or excavated basements not to exceed 50% of landscaped area | 14,964m ² (51%) 4,039m ² (27%) of landscaped area provided over podiums or excavated basements | Yes |
| Site Specific DCP | Required for sites in excess of 10,000m ² | The previously approved Masterplan for the site lapsed in 2007. The proposed Concept Plan satisfies the obligation for a site specific DCP. | Yes |

* The floor space proposed in the PPR scheme is calculated in accordance with the Seniors Living SEPP definition as it provides the prevailing floorspace control. No specific figure has been provided by the applicant for the floorspace proposed by the PPR as defined by the RLEP 1998 however the Department assesses this figure to be in the order of 44,121m² (expressed as FSR of 1.5:1 as a composite figure across the two zones).

** The maximum wall height proposed has not been finally determined for the Concept Plan as the building envelopes provided only give an overall building height.

Development Control Plan No. 18 - Corner of King and Dangar Streets Randwick

This Site Specific DCP was adopted by Council in July 1993 and provides a framework for the future development of the site. The DCP requires the submission of a Concept Plan for assessment. It states that the Concept Plan should adopt a principles approach indicating the

likely location of probable development including indicative location of buildings, public open space, cross site links, community facilities road pattern etc.

The site has previously been developed in accordance with a now lapsed Masterplan prepared in accordance with this requirement. The current Concept Plan seeks to complete the development framework for the site in accordance with these provisions of the DCP.

COMPLIANCE WITH OTHER CONTROLS

State Environmental Planning Policy (Infrastructure) 2007

Proposal was referred to RTA in accordance with Schedule 3 of the SEPP. Referral comments were received from the RTA who raised no objection to the proposal. Relevant conditions are recommended within **Appendix F**.

State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004

SEPP - BASIX aims to establish a scheme to encourage sustainable residential development across New South Wales. The current targets of BASIX for Residential Flat Buildings commenced on 1 July 2006 and require all new residential dwellings in NSW to meet targets of a 30% reduction in energy use and 40% reduction in potable water.

A condition is recommended in Appendix F requiring the submission of BASIX certificates with any future application for the serviced self-care apartments (as part of stage 2).

APPENDIX E POLITICAL DONATION DISCLOSURES

See the Department's website at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=3603