

Contact Officer: David Ongkili - 9399 0793
Your Ref: MP10_0044 MOD2
Our Ref: F2009/00460

22 March 2017

Team Leader – Key Sites Assessments
Department of Planning & Environment
23-33 Bridge Street
Sydney 2000

Attention : Ms Amy Robertson

Dear Madam,

SUBJECT LAND: 100-120 King Street and 30-36 Dangar Street, RANDWICK NSW 2031.
APPLICATION NO: MP10_0044 MOD2
PROPOSAL: Section 75W Modification Request to the Concept Plan for the Sir Moses Montefiore Jewish Home.

I refer to the above modification request by the proponent dated 9 December 2016 relating to Building D. Following a review of the Modification Request, Council makes the following comments:

Additional Level 7

Council notes that, among other things, the modification proposal will be modified to include an additional level (Level7) in Building D to house plant rooms. This proposed level is a new level but will have a maximum height compliant with the approved maximum building envelope height of RL61.63 for Building D under the Concept Plan modification approval MP09_0188 MOD 2. Notwithstanding this, it will entail a further modification to visually screen the new level that will extend outside the Concept Plan envelope approval comprising:

- A 515mm protrusion of façade screen above the envelope established under the Concept Plan modification approval MP09_0188 MOD 2
- A 770mm parapet extension along the King Street frontage of Building D above the envelope established under the Concept Plan modification approval MP09_0188 MOD 2.

Council raises concerns at these incremental protrusions above the approved Concept Plan building envelope as they add to the visual bulk and scale of the overall building when view from the main streets. While the proponent argues that the increase in height are minor and limited to Building D, the overall incremental increase in these areas are considered intrusive and confirms Council's concerns in past submissions of the potential for a creep in height as development is staged over the whole site in the future.

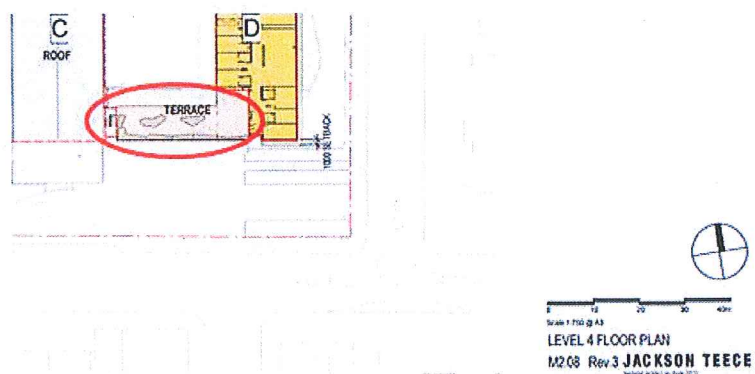
Council's position has always been that the proposed five-storey built form for Building D as approved under the modification approval MP09_0188 MOD 2 will be overbearing and dominant upon the existing medium density scale of the town houses and apartments in Dangar Street. Similarly, the additional level on Building D would appear dominant and intrusive relative to the existing maximum

two-storey mixed use and residential development on the southern opposite side of King Street. The need to screen this new level by increasing the height of the façade screen is indicative of this. The resultant façade screen can be seen in the following photomontage submitted with the current modification showing a heavy screening element with the proposed increase in height by approximately 0.5m in red dotted lines:



Terrace conversions

The modification involves deletion of approved terrace areas on Level 5 and replacement with dementia care rooms. Council raises concerns that the deletion of these communal areas would detrimentally affect the amenity of residents within the facility. Council also queries whether the amount of terrace area may have been understated as the approved concept plan also identified a significant terrace area along the southern wing of Level 5 which will be converted to dementia care rooms but apparently not referred to in the modification proposal (circled red in Figure below).



Retail layout

The modification proposal will reconfigure non-residential space and associated public plaza areas at Level 3 (ground floor). This non-residential space is referred to in the lodgement plan DA123 Issue 1 as "*Retail/Commercial/Community as per Concept Plan Modification Approval*". Council raises concerns at this description as it broadens the originally approved singular "retail" land use to allow for other commercial / community uses associated with the on-site Aged Care component thus potentially diminishing the overall retail area. It should be noted that in

August 2003, an amendment to the Randwick LEP 1998 was gazetted allowing the development of "local" shops within the subject site at the intersection of King and Dangar Streets, at a fixed area of 350 sqm GFA. Council's support for retail uses in the site has always been predicated on the requirement that a spatially defined retail component on-site should serve the wider community. Accordingly, concern is raised that the current modification seeks to undermine this objective through:

- An increase in the floor area of the non-residential component that potentially goes against the original objective of LEP amendment.
- An exclusivity in use of these non-residential components for only the Montefiore community and not retail uses for the wider community contrary to the original objective of the LEP amendment.

It should be further noted that the broadening of land uses within this designated retail area is contrary to the Concept Plan modification approval MP09_0188 MOD 2 which clearly marks this area purely as "Retail" in approved Drawing No. MA2.04Rev.1.

The current proposed modification retains an awkward linear configuration for the adjoining public square that impedes its function for passive recreational or spontaneous activities. In previous submissions on this matter, Council has consistently advised that consideration should be given to the depth of the plaza to allow for passive recreational; improving its geometric configuration and creating a terminating vista of higher quality to Church Street. In particular, Council has concerns that an elongated configuration will not be useable as a public open space for the community contrary to the regular configuration of a proposed public square under the Master Plan and development consent. Council maintains that the function, form and performance of the proposed public square should consider the public streetscape and surrounding community that this facility is located in and is a part of.

Parking and Traffic

The proponent advises that with a total 87 beds in the current proposal (additional net 5 beds) 34 car spaces will be provided. However these car spaces are distributed . Council's concern is that this appears to be another temporary arrangement between different areas of the site where shortfalls in car parking arising from incremental increases in bed numbers within designated building blocks (in this case Block D) are simply made-up from temporary spaces in other parts of the overall development site. In a situation like this, it is difficult to keep track of the cumulative changes in parking on-site for the existing established uses and current and future proposals. As such, the SEPP (Housing for Seniors or People with a disability) 2004 control for car parking which the accompanying planning report advises is compliant for the Building D proposal (p35) should also advise compliance for the overall existing development.

The Traffic Impact Assessment, in reference to construction traffic management (p16), advises that, as a management principle, *"contractors will be encouraged to either use public transport or ride share to/from the site"*. Council's questions the practicality of such an arrangement for contractors given their trade paraphernalia and the regular occurrence of contractor/trades vehicles parking in residential street during construction periods.

As in past submissions, Council reiterates that any Traffic Impact Assessment lodged with modification proposals for the subject site should address the

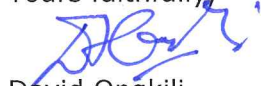
following issues which raise significant impacts on the state of on-street parking in adjoining and surrounding streets:

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

Such a request is justified especially as significant increases in beds and units occur through each future modification stages for Blocks C, E and F.

Should you have any queries, please do not hesitate to contact the undersigned at david.ongkili@randwick.nsw.gov.au or 9093 6793.

Yours faithfully,



David Ongkili
Coordinator Strategic Planning