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16 May 2017

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Your ref: MP09_0188 MOD3 and MP10_0044 MOD2

Attention: Mr Matthew Rosel, Consultant Planner

Re: Sir Moses Montefiore Jewish Homes, Randwick Campus – Council Submissions

Dear Matthew,

This letter has been prepared in response to Randwick City Council's submissions to the Department of Planning and Environment in relation to the above applications. It responds to the traffic related matters in the following correspondence:

- Letter from Randwick City Council (David Ongkili) to Amy Robertson, 23 March 2017 regarding MP09_0188 MOD3 in respect of the proposed Concept Approval modifications (**Attachment 1a**)
- Letter from Randwick City Council (David Ongkili) to Amy Robertson, 22 March 2017 regarding MP10_0044 MOD2 in respect of the proposed Block D Project Approval modifications (**Attachment 1b**)

The information in this letter is supplementary to, and should therefore be read in conjunction with, the following reports which have been lodged during the development process to date:

- The Halcrow Traffic and Transport Assessment for the Part 3A Concept application 1 September 2010
- The TRAFFIX Traffic Impact Assessment for the Part 3A Masterplan modification, 13 October 2015
- The TRAFFIX Traffic Impact Assessment for the Building D Development Application, 26 October 2016
- The TRAFFIX Traffic Impact Assessment for the Building E & F Development Application, 17 January 2017

A review of Council's submissions has been undertaken with respect to the relevant planning background and context.



In summary TRAFFIX considers the modifications requested in both of the aforementioned modification applications will have no detrimental change to the masterplan approved traffic and parking arrangements. Indeed the net result of the proposed changes is expected to be a slight improvement in traffic generation and parking provision over the yields previously assessed under the masterplan. We respond specifically to each submission as follows:

➤ **MP09_0188 MOD3 in respect of the proposed Concept Approval modifications – Parking and Traffic Implications**

The Concept Approval MOD3 submission proposes the removal of the childcare centre for 40 children replacing it with two Independent Living Units (ILUs). The traffic generation and the parking provision of the site shall be improved by this proposed change, with details as follows.

In accordance with RMS Guidelines, the 40 place childcare centre proposed under the current approved masterplan shall generate 32 trips in the AM peak and 28 trips in the PM peak. By comparison the two ILUs proposed are expected to generate, in total, less than one trip in either the AM or PM peak, resulting in a significant reduction in traffic generation for the site.

In addition the replacement of the childcare centre with two ILUs results in a net reduction of seven vehicle spaces required on site and returns four on-street parking spaces, currently signposted as pick-up / drop-off spaces, to untimed parking for the wider community use.

Accordingly, the change between the approved masterplan and the Concept Approval MOD3 proposal results in an improvement in traffic and parking conditions and is considered supportable from a traffic planning perspective.

➤ **MP10_0044 MOD2 in respect of the proposed Block D Project Approval modifications – Parking and Traffic**

Comment from Randwick City Council

(From first paragraph last sentence):

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.

TRAFFIX Response:

It appears Council has raised concerns about the cumulative changes proposed with respect to the whole Concept Approval under their response to the Project Approval modifications. The overall parking and traffic changes have previously been approved in the Concept Approval and Project Approval.

Nonetheless to address council's submission we re-present the existing parking conditions, the final parking conditions and two interim staging options based on current information.

In all scenarios reviewed the site contains sufficient parking to meet the requirements of the SEPP and DCP as can be seen below.



Existing Parking Conditions

The existing maximum staff at the peak time (excluding shift worker overlap, discussed later) is 122 staff members (**Attachment 2**).

The existing site contains 276 residential aged care beds.

The existing parking arrangements are as follows (totalling 147 spaces on site):

- Level 1 Block A – 63 spaces (undercover parking)
- Level 2 Block A – 41 spaces (undercover parking)
- Level 2 Block C – 31 spaces (undercover parking and open parking on future Block D site)
- West of Block C – 12 spaces (open parking)

As shown in Table 1, 89 car spaces are required and 147 car spaces are provided.

Final Parking Conditions

The Concept Approval MOD3 proposes the following additions:

- new Block D with 20 new staff (**Attachment 2**), net 87 new residential aged care beds and 350m² of retail GFA, and
- new Blocks E & F Independent Living Units with 154 bedrooms.

As shown in Table 1, 191 car spaces are required and 235 car spaces will be provided.

Interim Staging Parking Conditions

The construction may proceed in accordance with either of the following

- Construct and open Block D first, then Blocks E & F, or
- Construct and open Block E & F first, then Block D

Both of these staging options have been assessed as shown in Table 1. As shown in Table 1,

- If Block D is constructed first then 114 car spaces are required and 150 car spaces will be available.
- If Blocks E & F are constructed first then 166 car spaces are required and 232 car spaces will be available.

Further, it can also be shown that the site has a surplus of operational parking if Block D, E and F are built concurrently.



Table 1: DCP/SEPP Parking Rates

Type	Number	Minimum Parking Rates (see Notes)	Spaces Required	Spaces Provided
Existing				
Residential Care (High Care)	276 Beds 122 peak staff	1 space per 2 staff and 1 space per 10 beds	89	147
Existing + Block D only (i.e. without Blocks E & F)				
Residential Care (High Care)	276 Beds 122 peak staff	1 space per 2 staff and 1 space per 10 beds	89	150
Proposed Residential Care (Dementia)	87 Beds 20 peak staff	1 space per 2 staff and 1 space per 15 beds	16	
Retail	350m ²	1 space per 40m ²	9	
Total (Existing + Block D)			114	
Existing + Blocks E & F only (i.e. without Block D)				
Residential Care (High Care)	276 Beds 122 peak staff	1 space per 2 staff and 1 space per 10 beds	89	232
Independent Living Units	154 bedrooms	1 space per 2 bedrooms	77	
Total (Existing + Blocks E & F)			166	
Final Development (Existing + Block D + Blocks E & F)				
Residential Care (High Care)	276 Beds 122 peak staff	1 space per 2 staff and 1 space per 10 beds	89	235
Proposed Residential Care (Dementia)	87 Beds 20 peak staff	1 space per 2 staff and 1 space per 15 beds	16	
Retail	350m ²	1 space per 40m ²	9	
Independent Living Units	154 bedrooms	1 space per 2 bedrooms	77	
Final Development (Existing + Block D + Blocks E & F)			191	



Minimum Parking Rates Notes

1. The SEPP (Housing for Seniors or People with a Disability) 2004 requires parking to be provided at a rate of 0.5 spaces per bedroom.
2. Part 7 Division 2 (d) of the SEPP (Housing for Seniors or People with a Disability) 2004 lists the following parking requirements for residential care facilities:
 - 1 parking space for each 10 beds in the residential care facility (or 1 parking space for each 15 beds if the facility provides care only for persons with dementia), and
 - 1 parking space for each 2 persons to be employed in connection with the development and on duty at any one time, and
 - 1 parking space suitable for an ambulance.
3. The Randwick City Council DCP requires 1 parking space per 40m² Retail GFA

Construction Traffic

Comment from Randwick City Council:

The Traffic Impact Assessment in reference to construction Traffic Management advises that, as a management principle, “contractors will be encouraged to either use public transport or ride share to 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.

TRAFFIX Response:

TRAFFIX confirms it is common practice for construction contractors to have tools and equipment delivered to site whilst the workers themselves arrive by public transport. As an example, construction within the City of Sydney LGA is done solely in this way.

Furthermore, it is notable that the site contains unpaved areas that could be utilised as potential temporary on-site parking, such as the open space in the north-west corner of site adjacent Block A and open space to the west of Block C. However it is reiterated that construction employees shall be encouraged to utilise public transport and ride share in order to minimise the extent of temporary site parking required.

Further Parking Issues to Address

Comment from Randwick City Council:

- *The adequacy of the parking facilities in catering for overlapping staff shifts*

TRAFFIX Response:

As approved previously and shown above the development proposes parking above the minimum required by both the SEPP and DCP for the development. Notwithstanding it is considered that the published SEPP and DCP parking requirements take into consideration an allowance for overlapping staff shifts, an investigation into the impact of overlapping staff shifts has been undertaken.

Nursing Staff comprise the shift workers. Currently there are 43 Nursing Staff. This will increase to a total of 61 Nursing Staff with the addition of Block D. Blocks E & F ILUs do not add to Nursing Staff numbers nor the peak staff numbers.



Using the SEPP requirement for 1 parking space for each 2 persons employed then the overlap spaces required would be 31 spaces (i.e. 61/2). In Table 1 it can be seen that there is 44 spaces (i.e. 235-191) available for staff overlap at the peak period with the final development.

The shifts are 7am-3pm, 3pm-10pm and 10pm-7am. The most critical period, yet still compliant, is weekdays at 3pm when shift worker changeover coincides with the weekday staff who work 9am-5.30pm.

Similarly it can be seen from Table 1 that shift worker changeover parking is accommodated with the two staging options.

Should staff changeover parking ever become an issue then strategies such as staggering the shift changeover over say an hour period could be reviewed.

Comment from Randwick City Council:

- *The proposed allocation of parking spaces between staff members, residents visitors.*

TRAFFIX Response:

As approved previously and shown above the development proposes parking above the minimum required by both the SEPP and DCP for the development. It is considered that the published SEPP and DCP parking requirements take into consideration the requirements for staff members, residents and visitors.

The proposed allocation of parking spaces between staff members, residents and visitors is at the discretion of the Home. However the proposed allocation is in general proposed to be prorata similar to the ratios set out in the SEPP and DCP.

Comment from Randwick City Council:

- *The implications of any weekend peak traffic given that the access driveways are gated.*

TRAFFIX Response:

The development proposes to maintain the boom gates at the entry/ exits, akin to a shopping centre carpark. AS2890.1 indicates such a system is capable of accommodating up to 300 vehicles per hour. This system is considered satisfactory for the expected visitor movements to the site on a weekend which would be expected to be less than a tenth of this capacity.



Comment from Randwick City Council:

- *Existing parking restrictions relating to kerb site spaces in the vicinity to the site.*

TRAFFIX Response:

Currently kerbside parking is untimed and unrestricted in the vicinity of site, with the exception of four on street spaces in the southwest corner of site relating to the existing childcare centre restricted to short term pick up and drop off spaces during peak periods.

Concept Approval MOD3 deletes the childcare centre and would propose these spaces be returned to untimed and unmetered use.

Comment from Randwick City Council:

- *Details of any short-term parking spaces within the site, including those adjacent to the main reception area.*

TRAFFIX Response:

Currently the site contains an external porte-cochere accommodating five (5) spaces on the King Street frontage at Block C (Burger Centre) and six (6) five-minute drop off spaces at the Main Reception area on the internal road at Block A.

The Concept Approval MOD3 shall add a further two (2) drop off spaces within the site adjacent to the Block E and F entries.

These thirteen (13) spaces are in addition to the parking provision presented in Table 1.

Comment from Randwick City Council:

- *The concurrent parking needs and traffic implications of the childcare centre based on the current and proposed children numbers.*

TRAFFIX Response:

The concurrent parking needs and traffic implications of the childcare centre based on the current and proposed children numbers was previously approved with the existing Concept Plan.

As mentioned earlier in this response the Concept Approval MOD3 proposes deletion of the childcare centre, replacing it with two (2) ILUs. This in itself realises a net improvement of seven (7) available car spaces and eliminate childcare related traffic movement at the AM and PM peaks.



Conclusions

The Concept Approval MOD3 and Block D MOD2 proposals will have no detrimental change to the previously approved traffic and parking arrangements, instead providing an improvement over the current approvals in both traffic generation and parking provision for the site.

We trust the above is of assistance. Please contact the undersigned should you have any queries or require any further information regarding the above.

Yours faithfully,

traffix



Geoff Higgins

Executive Engineer



Attachment 1a

Concept Plan 'MOD 3' Response



Contact Officer: David Ongkili - 9399 0793
Your Ref: MP09_0188 MOD 3
Our Ref: F2009/00460

23 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: MP09_0188 MOD 3
PROPOSAL: S 75W Modification To Remove Childcare Use

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

In Council's submission to the Planning Assessment Commission in relation to MP09_0188 MOD 2, and specifically in relation to the proposed reduction in the approved 80 child care centre places to 40 places, Council advised as follows:

- *"The childcare centre was previously approved to be within a part-one / part-two storey component of Building F approximately 2m from the common boundary to the adjoining Centennial Apartment property to the west. Under the modification proposal, the childcare centre will now be wholly enclosed within the new Building Envelope F which is proposed to be totally setback by 14.5m from the common boundary to the adjoining Centennial Apartments building.*
- *The use of the setback area between the new Building F and the adjoining Centennial Apartment property for the child care centre playground and additional landscaping is not expected to increase noise impacts on this adjoining property as the child care centre is an existing use adjoining the Centennial Apartment property."*

In essence, Council raised no objections to the proposed modification to the childcare centre under MP09_0188 MOD 2. Accordingly, Council does not view the childcare centre use on the site as inappropriate subject to the use being managed to acceptable environmental standards and amenity levels. In view of this, in relation to the current modification proposal, Council raises concern that the removal of the child care use would take away not only an important community facility but also a communal one that was intended under the original concept plan for the Montefiore site to be part of an overall open, accessible and integrated facility where multiple compatible uses including retail, health, wellness and community uses (such as the childcare centre) could co-exist and be available for the general community. The proposed removal of the child care facility and its replacement with two additional ILUs effectively sees the gradual creation of a gated, closed and homogenous centre with little, if no, connection with the local community.

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



Attachment 1b

Block D 'MOD 2' Response



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.

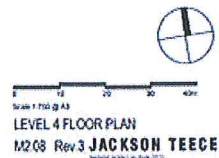
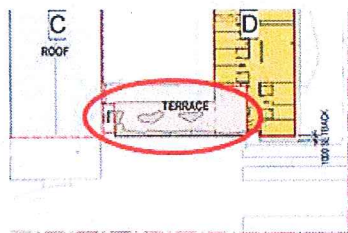
Council's position has always been that the proposed five-storey built form for Building D as approved under the modification approval MP09_0188 MOD 2 will be overbearing and dominant upon the existing medium density scale of the town houses and apartments in Dangar Street. Similarly, the additional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

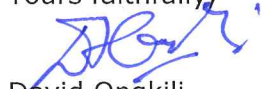
following issues which raise significant impacts on the state of on-street parking in adjoining and surrounding streets:

- 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



Attachment 2

Peak Staff Numbers

**Sir Moses Montefiore Jewish Homes
Randwick Campus
STAFF HEAD COUNT AT PEAK TIME**

**1. BLOCKS A, B, C, E & F STAFF HEAD COUNT AT PEAK TIME
DAY SHIFT-MONDAY TO FRIDAY**

AREA	STAFF DESIGNATION	HEAD COUNT
Special Care (low)	Admin (ECM,DCM,Admin Assistant, etc)	3
	Nursing (RN, AIN, etc)	4
Special Care (high)	Nursing (RN, AIN, etc)	6
Hostel	Admin (ECM,DCM,Admin Assistant, etc)	3
	Nursing (RN, AIN, etc)	9
Nursing Home	Admin (ECM,DCM,CNS, Admin Assistant, etc)	4
	Nursing (RN, AIN, etc)	24
Professional Services	NP,DT, RAO,Physio, OT, Social Workers, etc	20
Catering	Chefs, cooks, dietician, kitchenhands, waitstaff , café staff, stores, etc	27
Laundry	Laundry hands	5
Maintenance	Supervisor, handymen, gardener, etc	4
Reception	Conceirge, etc	3
Corporate	CEO, Executive PA, Directors & GMs, admissions, volunteer manager, etc	10
BLOCKS A, B, C, E & F	TOTAL HEAD COUNT PEAK TIME	<hr/> 122
BLOCK D (RACF)	EXTRA STAFF HEAD COUNT AT PEAK TIME DAY SHIFT-MONDAY TO FRIDAY	
	1 AIN per 6 extra residents	15
	1 RN per 30 extra residents	3
	Other extra staff	2
BLOCK D	TOTAL HEAD COUNT PEAK TIME	<hr/> 20
TOTAL SITE (future)	STAFF HEAD COUNT AT PEAK TIME DAY SHIFT-MONDAY TO FRIDAY	<hr/> 142