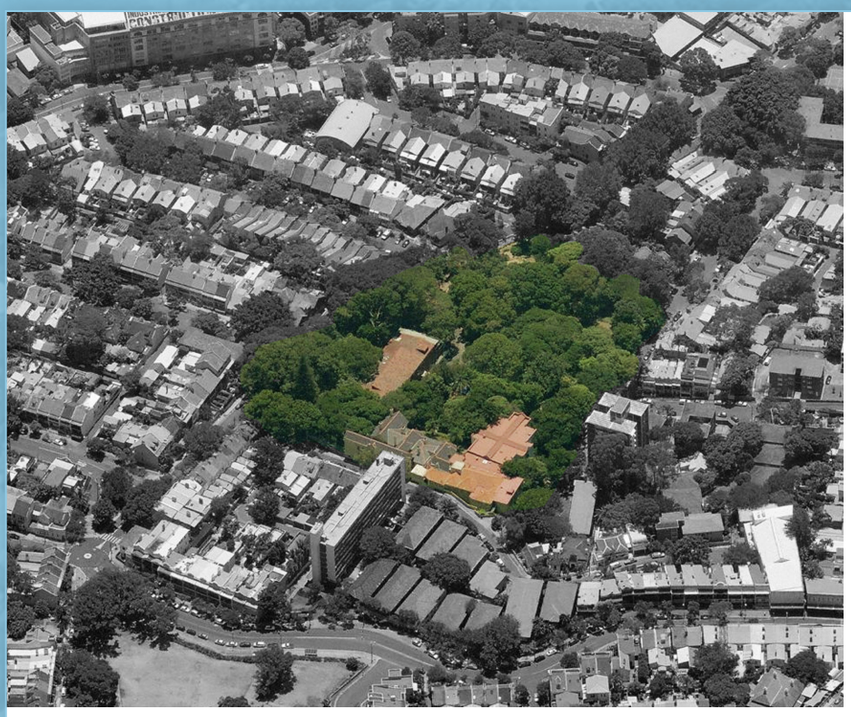


PREFERRED PROJECT ENVIRONMENTAL ASSESSMENT REPORT

The Scottish Hospital Site, 2 Cooper Street Paddington

Prepared for The Presbyterian Church (NSW) Property Trust

June 2011

urbis

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Director	David Hoy
Senior Consultant	Jacqueline Parker
Job Code	SA3265
Report Number	SA3265 PPR Report 28 June 2011

Statement of Validity

Submission of Environment Assessment:

Prepared under Part 3A of the Environmental Planning and Assessment Act 1979.

Environmental Assessment prepared by:

Names:	David Hoy Director	Jacqueline Parker Senior Consultant
Qualifications	BUrbRegPlan (UNE) MComm (UWS)	BPlan MUDD (UNSW)
Address:	Urbis Level 21 321 Kent Street Sydney NSW 2000	
In respect of:	The Scottish Hospital site, 2 Cooper Street, Paddington	

Certification:

We certify that we have prepared the contents of the Environmental Assessment and to the best of our knowledge the information contained in this report is neither false nor misleading.

Name: David Hoy

Date: 28 June 2011

Name: Jacqueline Parker

Date: 28 June 2011

URBIS
Australia Asia Middle East
www.urbis.com.au

FIGURES:

PICTURES:

TABLES:

Executive Summary

This Preferred Project Environmental Assessment report has been prepared by Urbis on behalf of The Presbyterian Church (NSW) Property Trust and supports a Major Project application to the NSW Department of Planning seeking consent for a Seniors Living Development at The Scottish Hospital Site, 2 Cooper Street Paddington.

The proposal was declared a Major Project by the Minister for Planning on 9 March 2010, and is therefore subject to assessment in accordance with Part 3A of the Environmental Planning and Assessment Act, 1979. The Minster for Planning is the consent authority for this proposal.

The Project Application Environmental Assessment was lodged on 12 November 2011. Following community consultation and discussions with the NSW Department of Planning & Infrastructure, a number of changes are proposed from the original scheme, to comprise the Preferred Project.

The preferred project seeks consent for redevelopment of the subject site for the following:

- Demolition of existing structures on site including the current Residential Aged Care Facility, redundant former hospital/theatre wing, some non-heritage-significant fabric within the former Scottish Hospital building, and other ancillary structures on the site,
- Removal of 88 trees from the site, including a number of low value and weed species,
- Earthworks and excavation,
- Construction of a new 100 bed Residential Aged Care Facility, incorporating 20 dedicated dementia care beds,
- Construction of 79 independent living units (ILUs) comprising a mix of 1, 2 and 3 bedroom apartments,
- Adaptive re-use of the heritage listed former Scottish Hospital building for ILU apartments,
- 132 on site car parking spaces for use by residents, visitors and staff, and
- New landscaping incorporating the retention of 51 trees including all heritage listed trees, and the replacement of approximately 80 removed trees with more site-appropriate vegetation.

The design of the proposal has been informed by a significant site and context analysis, and the range of constraints presented by the site characteristics including tree locations, heritage conservation and topography. It is also informed by the Church's desire to provide a significant community benefit through supplying aged care accommodation options to cater to the high unmet demand for both residential aged care places as well as independent living for seniors in the local community.

The proposed changes from the original project application include the following:

- Removal of the top floor on the Brown Street ILU building, resulting in an overall an eight storey proposal (five-six storeys above Brown Street) to a maximum height of RL 42.590 (to of lift over-run) and RL 41.740 to top of roof.
- Redesign of the eastern façade of the Stephen Street RACF building, and reconfiguration of the northern end of this building. Both internal floor plan changes and external alterations have been made which result in a more articulated northern end of this building, and a design more residential in character.
- The lowering of the air conditioning condenser units near the Stephen Street boundary further into the ground and enclosing them with a louvred screen to minimise visual and acoustic impact on neighbouring residences.
- Three options are presented for the landscape treatment along Stephen Street. The preferred option utilises a revised planting strategy for vegetation along this boundary to ensure that there is

a gradual replacement of trees and lower scale vegetation, rather than a wholesale removal and replanting, resulting in a greater level of vegetative screening. The remaining two options are detailed at **Appendix J** to this PPR EA report.

- It is still proposed to locate the service access from Stephen Street. This is the applicant's preferred option from both a functionality and design perspective, as it will enable more efficient servicing of the development without disrupting the internal workings of the site, and impacting only minimally on the traffic flows on Stephen Street. At the request of the Department of Planning, a design alternative (Option B) has been developed which provides for servicing from within the site (accessed from the Brown Street site entrance). These design options for servicing are detailed within the Architectural Plan set at Appendix B to this PPR EA report.
- Additional information or clarification is also provided in response to the Department of Planning's letter dated 15 March 2011 regarding contamination, SEPP 65 'rules of thumb' assessment, traffic (loading and unloading activities, car parking numbers), Water Sensitive Urban Design measures, stormwater runoff, noise impacts, urban design, solar access, view analysis and the proposed Voluntary Planning Agreement with Woollahra Council.

It is intended that the proposed facility be owned in perpetuity by the Presbyterian Church (NSW) Property Trust, and operated by Presbyterian Aged Care, the established aged care arm of the Presbyterian Church. Through the redevelopment of the site, PAC aims to provide high quality residential accommodation for older people in the community, catering to the varying needs of such residents. It is intended that approximately 45% of all RACF beds will be available as 'concessional' beds (meaning that no accommodation bond is payable), significantly contributing to the shortfall of places in Sydney's eastern suburbs. The existing dementia care facility on site will be expanded to accommodate the increasing need for such services. The mix of independent living units addresses the increasing market demand for two and three bedroom units, whilst also providing one bedroom apartments to cater for smaller accommodation needs and a range of affordability levels.

Providing both independent living and residential aged care on the one site supports the current best practice of providing ageing-in-place options for residents.

Significant community consultation has been undertaken during the design stages of the scheme, including site walks, six community workshop sessions, community newsletters and other consultation initiatives. This process enabled the design team to present to the community initial thoughts regarding the location and massing of built form on the site, and identified a range of opportunities and constraints to be responded to. Issues raised by the community as part of the community consultation and public exhibition of the Project Application have informed the Preferred Project the subject of this report.

The proponent and Woollahra Council have been in negotiations regarding the possibility of entering into a Voluntary Planning Agreement. The preliminary proposal sought to dedicate to Council part of the open space at the north of the site for the expansion of the adjoining Dillon Reserve and introduce a partial street widening on Stephen Street inclusive of 90 degree parking and a footpath on the western side of the street, as an offset against the payment of s94 or s94A contributions. Whilst negotiations have commenced with Council in this regard, no in-principle Draft VPA has been agreed. As such, a Draft VPA does not accompany this report. As it is unlikely that a draft VPA will be agreed during the assessment of this project it is requested that should the project be approved, a condition of consent be imposed requiring that the proponent either

- pay relevant s94 or s94A contributions to Woollahra Council, or
- enter into a VPA with Woollahra Council, or
- a combination of the above

at the agreement of both parties.

Any VPA would require public notification prior to execution.

An assessment of the preferred scheme has been provided against the relevant Environmental Planning Instruments and State and local policies and is found to be consistent with the objectives and

intent of these plans. Overall it is considered that the proposal responds appropriately to the site and its context, and will present a significant community benefit, catering to the increasing range of needs for accommodation for older people within the eastern suburbs of Sydney.

1 Introduction

This Preferred Project Environmental Assessment report (PPR EA) has been prepared on behalf of The Presbyterian Church (NSW) Property Trust (Presbyterian Church) in respect to Major Project Application no MP 10_0016 for a Seniors Living development, including Independent Living Units and a Residential Aged Care Facility at the Scottish Hospital site, 2 Cooper Street Paddington. This Project Application has been made under section 75E of the Environmental Planning and Assessment Act, 1979 (The Act).

The Preferred Project Application seeks consent for a seniors living development at the Scottish Hospital site, involving the following:

- Demolition of all existing structures, except for the heritage listed former Scottish Hospital building along the Cooper Street frontage,
- Construction of three new buildings and adaptive re-use of the heritage building for the purpose of 79 independent living units (ILU),
- Construction of one new Residential Aged Care Facility (RACF) building to accommodate 100 aged care beds including dementia care,
- On site car parking for a total of 132 cars primarily accommodated within an excavated basement,
- Removal of non-significant trees and vegetation, and extensive re-landscaping of the site, and
- Ancillary residential facilities for use by residents on the site.

The Presbyterian Church will maintain ownership of the site. The new facility will be operated by Presbyterian Aged Care (PAC), the aged care arm of the Presbyterian Church. PAC is an established seniors care provider in the Sydney region.

The design of the proposal has been informed by a thorough site and context analysis, as well as relevant statutory requirements of *SEPP (Housing for Seniors and People with a Disability) 2004* and other State and Local Environmental Planning Instruments and policies.

The proposal was declared a Major Development under clause 6 of State Environmental Planning Policy (Major Development) on 9 March 2010.

The Project Application was lodged on 12 November 2010 detailing the initial scheme for the site, and addressed the Director General's Environmental Assessment Requirements (DGRs), issued by the Department of Planning on 6 May 2010.

This report outlines the Preferred Project, which has been amended from the original project application scheme, having regard to issues raised by the community and the Department of Planning & Infrastructure during public exhibition period.

This Preferred Project EA comprises two volumes:

- Volume 1 – Environmental Assessment Report.
- Volume 2 – Appendices containing the amended architectural plans, and updated expert reports.

  All other consultant reports remain unchanged from the Project Application lodgement in November 2010 and can be found on the DPI website.

2 Background

On 5 February 2010, A Preliminary Environmental Assessment (PEA) was lodged with the Department of Planning (DoP) on behalf of the Presbyterian Church (NSW) Property Trust, requesting the following in relation to the proposal detailed within the PEA:

- **Major Project Declaration** - Confirmation as to whether the Minister considers the project to be a 'Major Project' pursuant to Cl 6 of *State Environmental Planning Policy (Major Projects) 2005,* by way of Clause 13 to Schedule 1 of the policy.
- **Director General's Requirements** - If declared a Major Project, notification of any Environmental Assessment requirements of the Director General pursuant to Section 75F to Part 3A of the *Environmental Planning and Assessment Act 1979.*

Subsequently, the subject proposal was declared to be a Major Project by the Minister for Planning on 9 March 2010, under Clause 6 of State Environmental Planning Policy (Major Projects) 2005.

Following review of the PEA, the Director General issued the Director General's Requirements (DGRs), which informed and were addressed in the Project Application EA report lodged for the proposal on 12 November 2011.

A copy of the DGRs issued, are attached at **Appendix A** to the Project Application EA report (November 2010).

2.1 The Project Team

The proponent for this Project is Presbyterian Church (NSW) Property Trust. The consultant team assisting the proponent comprises:

- Philon – Development Manager
- Cerno Management – Project Manager
- JPR Architects Pty Ltd – Architecture
- Flower & Samios – Specialist RACF Architecture
- Urbis – Planning Strategy and Approvals
- GMU – Urban Design
- Conybeare Morrison – Heritage Architecture
- Aspect Studios – Landscape Architecture
- MWT Halcrow – Traffic and Transport Planning
- Urban Concepts – Community Consultation
- Casey & Lowe – Archaeological Heritage
- Steve King – Solar Access
- Douglas Partners – Geotechnical and Hydrogeological Engineering
- Cumberland Ecology – Fauna Assessment
- TTW – Structural Engineer
- WT Partnership – Quantity Surveyors
- Cardno ITC – ESD, Basix, Stormwater, Utilities Services
- Tree Wise Men – Aboriculture

- Musecape – Heritage Landscape
- Noel Bell Ridley Smith – Heritage Consultants
- Wallace Mackinnon & Associates – Needs Analysis
- Mark Relf – Accessibility
- Steve Watson & Partners – BCA
- EIS – Contamination

2.2 Previous Consents

Development consent for alterations and additions to the existing facility on the site was granted by Woollahra Council on 31 January 2002 (DA931/2001). The approved development comprised:

- 19 self-care dwellings.
- 182 hostel/nursing care flexible units (providing up to 207 beds).
- On site support facilities and amenities.
- Parking for 73 cars.
- Approximately 17,229.15m^2 gross floor area (GFA).

Condition 1 of this consent deferred it's commencement until the site had been remediated. DA931/2001 has since lapsed.

Development consent 427/2001 was subsequently granted for the excavation and removal of potentially contaminated soil. That consent has also since lapsed.

2.3 Community Consultation undertaken by the Proponent

Extensive community consultation was facilitated throughout the preliminary design stages of the project, prior to lodgement of the Project Application in November 2010, in accordance with the Community Consultation Strategy prepared by Urban Concepts and accompanying the Project Application EA report (November 2010) at **Appendix C**.

The specific objectives the Presbyterian Church sought to fulfil from implementing the Communications Plan were:

- To engage with surrounding residents and integral stakeholders to develop a design solution for the proposed aged care development that considers community concerns and achieves PAC's charter.
- To promote awareness of the heritage and conservation of the site through the adaptive reuse of the 1848 heritage building and the heritage gardens.
- To explain the funding nexus between the provision of aged care beds for the socially disadvantaged and the provision of independent aged care units.
- To investigate the opportunity for setting aside part of the site to the community for incorporation into the Dillon Street Reserve.
- To document how the proposal will help to address the chronic shortage of aged care accommodation that exists within Inner Sydney.
- To communicate the willingness and desire of the proponent to work with Woollahra Council notwithstanding the Part 3A project status resulting from its declaration as a Major Project.

- To ensure surrounding residents and integral stakeholders are provided with the opportunity to express their views about the aged care proposal from master plan formulation through to the final architectural design solution.
- To establish and maintain open channels of communication between surrounding residents and integral stakeholders that will remain in place for the development assessment and, pending approval, the construction process.
- To ensure surrounding residents, the retail and business community and integral stakeholders understand the urban design and economic considerations that underpin the design and the urban design process that has culminated in the preferred architectural concept.

The Scottish Hospital Redevelopment Communication Plan was prepared by Urban Concepts in accordance with the Director Generals Requirements issued for this project. The Communication Plan presented a staged consultation methodology to complement the formulation of master plan options for the site, the selection of a preferred master plan and the preparation of the Project Application. The first Stage of the consultation was undertaken in two stages.

Stage 1 Consultation initiatives were designed to obtain community feedback about:

- site analysis, opportunity and constraints investigations undertaken by GMU Urban Design;
- building form, landscape and heritage design principles formulated by GMU Urban Design; and
- the two master plan options prepared by JPR Architects.

The outcomes arising from Stage 1 were used by the design team to advance a preferred master plan option for the site.

Stage 2 Consultation initiatives examined community attitudes to the preferred master plan option enabling it to be further refined in line with community feedback prior to the lodgement of the Major Project Application and the Environmental Assessment.

The following table details the extent of initiatives undertaken during the preliminary design stages of the project, in order to reach as wide catchment of stakeholders as possible.

Table 1 – Communication Initiatives Pre-Lodgement

Communication Initiative	Date Undertaken	Level of Participation
Information Lines		
1800 PAC Paddington Information Line 1800 708 067	1 April through to 29 July 2010	47 telephone calls logged
Project Correspondence PO Box	8 February through to 29 July 2010	6 letters were received. These were registrations for the Design Evaluation Workshop and Community Information Sessions
Project email	12 April though to 29 July 2010	25 emails have been received relaying comments about the project
Community website	12 April though to 29 July 2010	820 visitations including feedback comments and registrations for consultation events
Media Management	31 March through to 29 July 2010	5 display advertisements placed in the Wentworth Courier ▪ 31 March

Communication Initiative	Date Undertaken	Level of Participation
		▪ 21 April ▪ 12 May ▪ 9 June ▪ 16 June
Community Newsletters		
Newsletter 1	20 April 2010	1,750 newsletters distributed by Australia Post in conjunction with Woollahra Council
Newsletter 2	7 June 2010	1,750 newsletters distributed by Australia Post in conjunction with Woollahra Council
Stakeholder Briefing Paper and Newsletters	20 and 21 April 2010	Briefing papers and/or letters were issued by Australia Post and via email to the following groups ▪ PAC Paddington ▪ Woollahra Council ▪ Federal and State Elected Representatives ▪ Resident Groups ▪ Families and Residents ▪ Emergency and Utility Groups ▪ Aged Care Providers In total, 209 briefing papers and letters were circulated
Site Banners	No. 1 – Thursday 22 April 2010 No. 2 – Thursday 10 June 2010	3 site banners were erected around the Scottish Hospital Site advertising upcoming events
Meet and Greet	22 April 28 April	98 properties were visited. A letter inviting participation in the consultation was left for those properties unattended
Consultation Events		
Stakeholder Briefing Sessions	▪ 22 March 2010	▪ Woollahra Council
	▪ 6 May 2010	▪ Residents and staff of the existing PAC nursing home on the site
	▪ 16 June 2010	▪ Paddington Society – Executive Committee
	▪ 30 June 2020	▪ Aged Care Focus Group – 6 attendees
	▪ 30 June 2010	▪ Body Corporate Executive – 40 Stephen Street – 7 attendees
	▪ 22 June 2010	▪ The Member for Sydney the Hon Clover Moore Lord Mayor of

Communication Initiative	Date Undertaken	Level of Participation
		Sydney
Site Open Day and Site Walks	Saturday 1 May 2010 9am – 5pm Site Walks ▪ 10.00-11.30am ▪ 12.30-2.00pm ▪ 3.00-4.30pm	Total number of participants throughout the day – 86
Design Evaluation Workshops	Monday 3 May 2010	Session 1 (4-6pm) – 17 attendees Session 2 (7-9pm) – 5 attendees
	Tuesday 4 May 2010	Session 1 (4-6pm) – 14 attendees Session 2 (7-9pm) – 16 attendees
Community Information Sessions	Thursday 17 June 2010	Session 1 (4-6pm) – 21 attendees Session 2 (7-9pm) – 15 attendees
Comment Sheets		Stage 1 – total 39 received Stage 2 – total 14 received

Specific details regarding the running and outcome of these initiatives is contained it the Community Consultation Report prepared by Urban Concepts, included at **Appendix C** to the Project Application EA Report (November 2010).

2.4 Community Consultation undertaken by the NSW Department of Planning

Following lodgement of the Project Application, the proposal was publicly exhibited by the NSW Department of Planning, from 17 November until 17 December 2010. A number of submissions were received in response to this exhibition. This Preferred Project addresses a number of issues raised.

2.4.1 Issues raised by the Community

A total of 89 submissions were received in response to the public exhibition of the Project Application, comprising the following:

- 79 submissions from neighbouring residents (including one petition of 180 signatures).
- 7 submissions from Local and State Government authorities.
- 3 submissions from local politicians and interest groups.

The consultant team has responded to the issues raised by the community. This response table is submitted to the NSW DPI under separate cover to this Preferred Project EA report, and identifies where design changes have been made in response to the submissions.

A separate response has also been prepared to the submissions received from Woollahra Municipal Council and the National Trust.

2.4.2 Issues raised by the NSW Department of Planning

The then NSW Department of Planning outlined a number of issues to be addressed in a Preferred Project report, in their letter addressed to the proponent dated 15 March 2011. These issues are addressed in the Preferred Project as detailed below.

Key Issues

1. Building Height and Heritage Impact

- *A reduction in the height of the Brown Street ILU building is required. The subject building should be amended to be no greater in height than the maximum roof ridge level of the main Heritage Building on Cooper Street. In this regard, amended envelope options for the revised building should be provided which maintain the existing footprint and the principle of stepping the building down to the north. Any re-distribution of floorspace is unlikely given the proposed site layout and existing site constraints.*

The proponent has agreed to make the above change. This Preferred Project application reflects an amended Brown Street ILU building to a maximum of 8 storeys, and maximum RL of 41.740 to the roof of the dwellings, and RL 42.590 to the top of the lift over run. The predominant building height is equal to that of the ridge to the Cooper Street heritage building. Amended architectural drawings prepared by JPRA accompany this EA report at **Appendix B**.

2. Residential Amenity

- *A further shadow analysis is required for mid-winter and equinoxes at hourly intervals between 9.00AM and 3.00PM at a more legible scale of 1:250 to clearly demonstrate the areas of open space impacted. The shadow analysis should include a consideration of the impact upon the western (internal elevations) of the Stephen Street RACF and ILU buildings.*

An updated shadow analysis has been prepared by JPRA which accompanies this EA report at **Appendix B**. Shadow impacts are discussed further at **section 8.4.1** of this report.

- *Consideration should be given to the loading dock on Stephen Street having regard to the proximity of residential properties.*

The proponent is of the opinion that providing service access from Stephen Street provides the best design and site layout option for the proposal. Servicing from this location will be the most efficient in terms of RACF operation, will not cause unnecessary internal design impacts for the proposal and will only have minimal impact on the traffic flow along Stephen Street. As such, this location still forms the preferred entrance as shown on the plans.

As requested by the Department, an Option B has been developed which provides for service access from within the site, via the existing Brown Street vehicular access point. Plans showing this arrangement are provided as supplementary to the Preferred Project plans at **Appendix B**. The internal servicing option requires that a new driveway be constructed to the north of the Stephen Street ILU building, creating a physical barrier between the ILU building and the open space to the north. Whilst this urban design outcome is not considered favourably by the design team, the proponent would find it difficult if the Department placed a condition on any consent issued requiring that internal servicing of the site be achieved in accordance with the servicing Option B plans provided.

Further discussion on this issue is provided at **section 5.1.7** of this EA report.

- *Further to consideration of item 1 above, an amended View Impact Assessment should be submitted in relation to the properties located to the south and west in Cooper Street and Brown Street respectively.*

A revised View Impact Assessment has been undertaken in light of the reduced height to the Brown Street ILU building. These revised view studies are provided at **Appendix W** to this PPR EA report, and are discussed in **section 8.4.6** of this report.

Additional Information Required

The following additional information was requested by the Department

- *A Contamination Assessment in accordance with the requirements of SEPP 55 – Remediation of Land (The Department understands that several reports may have been undertaken, however requires a recent site contamination assessment to confirm the site suitability for residential development).*

A summary contamination report has been prepared by EIS (Environmental Investigation Services) dated 25 November 2010, and accompanies this PPR EA at **Appendix T.** The summary report details

- Whether the previous investigations undertaken at the site will comply with SEPP 55;
- The outstanding remediation issues at the site; and
- What remedial works and other environmental assessments will be needed to complete the development.

The findings of this summary report are discussed in **section 8.9** of this PPR EA report.

- *An updated SEPP 65 Report including a numerical assessment against the Residential Flat Design Code "Rules of Thumb".*

An updated urban Design Assessment has been prepared by GMU in light of the amended scheme. This updated report accompanies the PPR EA at **Appendix F** and includes an updated "Rules of Thumb" assessment against the provisions of SEPP 65.

- *Details of loading and loading activities, including the type of vehicles servicing the development alternate design to allow vehicles to enter and exit the site in a forward direction.*

Details of loading and unloading activities and delivery truck sizes have been provided form the Presbyterian Church. These are detailed in **section 5.1.7** of this report.

- *Justification for the car parking provision exceeding the Seniors Housing SEPP requirements.*

The number of car parking spaces provided on site is generally in accordance with the requirements of SEPP HSPD. This issue is addressed in the Traffic Report at **Appendix L** and in **section 5.1.7** of this report.

- *Further details on any areas on-site which may accommodate grassed swales, rain-gardens or other Water Sensitive Urban Design measures.*

The landscape report and design scheme has been updated from the original proposal and accompanies this PPR EA report at **Appendix J**. This is also discussed in more detail in **section 8.4.5** of this report.

- *An assessment of the impact of stormwater runoff on the land adjacent to the site and mitigation solutions.*

The Stormwater Management Strategy prepared by Cardno ITC and submitted at **Appendix R** of the Project Application EA Report (November 2010) details the impact of stormwater runoff on the land adjacent to the site. The DPI has confirmed that the report adequately addresses this issue.

- *Measures to reduce any noise impacts to adjacent residents from noise sources such as loading/unloading operations, plant, mechanical ventilation and air-conditioning units.*

The updated Operational Management Plan at **Appendix M** sets out that deliveries typically occur between 7am and 6pm Monday to Friday. All refuse removal will occur via the Brown Street entry. All plant and equipment installed in the development will comply with noise criteria set out in the relevant Australian Standards including, if necessary, relocation of units.

- *Further documentation outlining the progress of any Voluntary Planning Agreement (VPA) with Woollahra Council including details on the dedication of land adjoining Dillon Reserve and clarification whether any works are proposed on Council land, including evidence of owner's consent. The PPR should clearly indicate those aspects of the proposal which are reliant upon the VPA being executed between the parties.*

The proponent and Woollahra Council are still in negotiations regarding a possible VPA for the site. This is detailed in **section 5.1.10** of this PPR EA report.

The proponent confirms that the preferred scheme as detailed does not rely on the execution of a VPA. Any works undertaken as part of a VPA are over and above those detailed on the plans or in this report.

The above amendments are detailed on the updated Architectural Plans and Specialist Reports accompanying this Preferred Project EA Report.

3 Strategic Justification for the Project

3.1 Role of PAC

Presbyterian Aged Care NSW & ACT (PAC) is the aged care arm of the Presbyterian Church in Australia (NSW) and is the operator of the aged care services currently at 74 Brown Street and 2 Cooper Street Paddington, the subject site. The Presbyterian Church has been involved in the provision of aged care for over 60 years. PAC provides aged and community care services and seniors housing across NSW and the ACT, including 10 residential care services, 10 community care services and 12 retirement villages serving around 1,200 older people. PAC employs over 64 staff in NSW. PAC's annual budget is worth around $37 million, with assets worth $63 million after depreciation.

3.2 Current Facilities on Site

Presbyterian Aged Care Paddington presently comprises an aged care facility built in 1976 serving 88 residents. There are 35 high care places and 53 low care places operational, with a further 16 bed licences offline. The facility is in need of an upgrade to serve the current demands of high care nursing requirements.

3.3 Vision for the Site

The redevelopment of the Scottish Hospital site presents an opportunity to create an iconic development which achieves a sense of being for a community in its own right, whilst also operating as part of the wider Paddington community within which it sits.

Planning vision

One of the aims of the Major Development SEPP is to

> *'facilitate the development, redevelopment or protection of important urban, coastal and regional sites of economic, environmental or social significance to the State so as to facilitate the orderly use, development or conservation of those State significant sites for the benefit of the State'.*

The subject proposal presents an opportunity of State and regional significance for the provision of much needed seniors housing on a site of a scale that enables such a use to be feasibly delivered. The Scottish Hospital site is one of the last remaining large redevelopment sites available in Sydney's eastern suburbs. It is located in an area which has one of the highest residential densities in Sydney's East at greater than 25 dwellings per hectare (refer extract below from the East Subregional Strategy), and which has an identified high need for residential accommodation specifically designed to meet the need of seniors within the community.

The proposed use will help to achieve the region's residential and employment targets set by the East Subregional Strategy, on a site close to public transport.

Aged Care vision

Research undertaken by Wallace McKinnon & Associates Pty Ltd on behalf of the Presbyterian Church (refer **Appendix D** of the Project Application EA Report – November 2010) identifies a high demand for low and high care places within Sydney's Eastern Suburbs. Whilst Randwick LGA is well served with Residential Aged Care places, Woollahra, Waverley and Sydney LGAs, being potentially the major catchment for the subject site, are in a deficit position compared to the Federal Government's desired ratio of 88 places per 1,000 people 70 years and older.

The retirement village situation is similar to the residential aged care position with minimal facilities available throughout the surrounding Eastern Suburbs LGAs. Many of the villages have been in operation for a long period and do not provide the contemporary accommodation and services required to meet the growing expectations of potential clients. There is no Independent Living Unit accommodation available in Paddington.

Most of the ILUs are in small villages which do not have residential aged care facilities on the site to cater for the ongoing care needs of the residents. With the very limited number of residential care places available in the surrounding LGAs, residents requiring care may have to be accommodated in facilities outside the area.

PAC's vision for the site is to provide a range of high quality accommodation options for residents of the Eastern Suburbs whose current accommodation is no longer suitable for their needs. It also wishes to provide a facility which is financially self sustaining in order to ensure high quality services can be provided to its residents without necessarily having to rely on diminishing federal funding for aged care places. The result of reliance on diminishing Federal funding is the often run down aged care facilities which are common throughout Sydney.

Whilst a Government requirement for a RACF facility is to provide a minimum of 19.5% of places as 'concessional' places (which require no bond payment), the aim for PAC Paddington is to provide 45% of the RACF beds as 'concessional'. This increased provision of low cost beds is consistent with the Church's mission to provide care and support for people in need. In addition, Independent Living Units would be provided on the site both to provide longer term ageing-in-place options for site residents, as well as helping to offset the additional concessional RACF beds and ensure ongoing financial sustainability for the development. These ILU apartments will also help to ease some of the high demand for self care senior apartments in the locality.

3.4 Project Objectives

PAC wishes to redevelop the current aged care services on with a new 100 bed Residential Aged Care Facility (RACF) in addition to 79 Independent Living Units (ILUs) to support the ageing in place model for the site.

As the site currently accommodates an operating RACF with elderly and frail residents, it is PAC's intention to retain the ongoing use of this facility during the construction of the new facility, if approved.

Residential Aged Care Facility

A RACF facility will be purpose designed to accommodate ageing in place and built to BCA Class 9c standards. It will be capable of providing (or being adapted to provide) the types of new services likely to be needed in the Eastern Suburbs of Sydney in coming decades, such as:

- Dementia-specific care.
- Palliative care.
- Complex medical needs.
- Respite care.

A new RACF will allow for a mix of low and high care areas spread across four floors. There will be one dedicated high care level, one dedicated low care level, one level with a secure dementia-specific area, and one level with a mix of high and low care rooms.

The building will adopt dementia design principles (especially for the dementia-specific area).

The RACF will include:

- Dedicated activities spaces for residents.
- Laundry capacity to service on-site cleaning and drying of personal laundry; linen and contaminated clothes will be picked up and send to a central laundry at PAC Ashfield.
- Kitchen capacity to provide on-site cooking for residential care, ILU and community programs running from PAC Paddington site. It is likely PAC will initially provide cook-chill food via a contract with an external supplier, but the kitchen will be designed to allow for on-site cooking in the future.
- Food services on each level.

- Sensor lights in ensuites.
- Separate spa bathroom.
- Nurse call system, integrated with phone system and bed sensors in dementia-specific area.
- Capacity for computerised care to be delivered at the bedside.
- Plenty of storage for lifters.
- Offices for Facility Manager, Deputy Manager, Educator/CQI coordinators and administrative staff, and staff room.

The RACF will be owned by The Presbyterian Church (New South Wales) Property Trust, an approved provider under the Commonwealth Aged Care Act 1997 and managed by Presbyterian Aged Care (PAC). PAC has all the residential care places it requires already allocated to PAC Paddington. The current aged care facility has a fill three year accreditation.

The Australian Department of Health and Ageing will provide recurrent funding to PAC for the operation of the facility based on the residents' care needs and financial circumstances (as defined in the Aged Care Act 1997) and PAC will charge residents fees according to the amounts allowed under the Aged Care Act 1997.

Independent Living Units

In addition to the RACF, redevelopment of the site will allow the opportunity to construct 79 modern medium-density independent living units (ILUs) and associated car parking. There will be a mix of one and a half, two and three bedroom apartment sizes meaning PAC can target a mix of affordability levels.

Unit features will include:

- Environmentally friendly design.
- Spacious and modern kitchen areas, separate internal laundries.
- Bathrooms appropriate for older people.
- Generous storage space.
- Emergency call systems for each unit.
- Accessible walkways and unit entrances.

ILU residents will also have access to

- A main common room large enough to seat all ILU residents, with theatrette, wiring for digital/pay TV and internet, and kitchen and toilet facilities.
- Another smaller common room.
- A library and games room.
- A spa and gymnasium.
- A built-up communal garden area designed for residents who want to have a small vegetable garden.
- A community bus for transport to shops and medical centres, and for outings.

The ILUs will be operated as a retirement village by PAC, in accordance with the NSW Retirement Villages Act 1999.

The most common arrangement in retirement villages is a loan and/or licence agreement. All residents enter into a licence agreement, which grants a resident a right to occupy the premises. All the details are documented in the contract offered to a resident before they move in.

Recurrent charges are payable in every retirement village to meet the expenses of operating the village. The Retirement Villages Act 1999 and the Retirement Villages Regulation 2009 set out in detail how recurrent charges may be varied. PAC has chosen the option of varying recurrent charges by 'otherwise than a fixed formula'. This means that a budget for the operation of the village is developed each year and residents have an opportunity to review and approve the budget and recurrent charges. This ensures resident input into the decisions about the expenditure for the village.

Residents will be offered access to optional services which include domestic assistance or personal care at additional cost. Where a resident requires additional help and is assessed as eligible for a government-funded community care program, PAC will assist the resident to access such a service through referral to local community care services.

Communal Facilities for Residents

PAC intends to provide a range of common facilities which can be used by older people from residential care, the ILUs and the community care programs as well as visitors such as relatives. Key among these are:

- Allied health / medical centre – consulting room and waiting room, with equipment suitable for visiting allied health professionals.
- Beauty salon – incorporating as a minimum one or two rooms for a hairdresser and beautician.
- Café open to residents, community day program clients, family members, staff.
- Landscaped gardens reflecting the heritage aspects of the site and including an outdoor bbq area and seating.

To support the operation of the facility, a number of common support functions will operate across the whole site, including:

- Receptionist and administration.
- Building and garden maintenance, with a dedicated space for maintenance stores/workshop.

4 The Site and Context

4.1 The Site

The site is legally described as Lot 2 in DP 607572 and is known as the Scottish Hospital site. The address of the site is 74 Brown Street Paddington, and it has an area of 1.478ha. The site is bounded by Brown Street to the west, Cooper Street to the south, Stephen Street to the east and a public park known as Dillon Street Reserve to the north. Existing development on the site comprises:

- The original heritage listed Scottish Hospital building fronting Cooper Street, and its associated terraced gardens to the building's north. This building is currently vacant and in disrepair.
- A modern extension to the Scottish Hospital building, comprising operating theatres along the Stephen Street site frontage. This building has an equivalent height of four stories. It is currently vacant and in disrepair.
- A four storey Nursing Home building towards Brown Street.
- Several significant trees on the western and northern portions of the site.
- A large open space area towards the north of the site which interfaces with Dillon Street Reserve.

Vehicular and pedestrian access is provided at the north western corner of the site, off Brown Street. On site car parking is provided at-grade on a sealed bitumen surface, located towards the centre of the site.

Whilst the original Heritage building and Stephen Street wing are currently disused, the Brown Street building is used as a residential aged care facility accommodating 88 beds, including 20 dedicated dementia care places.

The site is characterised by extensive vegetation cover, including a number of significant and heritage listed trees that are associated with the original heritage residence. Whilst the surrounding street system follows the steep topography falling from the south to the north, the subject site has been 'cut-in', with the site falling away steeply from the Cooper and Brown Street frontages in the south-west of the site, forming a bowl. The rate of grade change levels out as the land moves east and north. The northern boundary is contiguous with the natural ground level of Dillon Street Reserve to the north, and, for the most part, Stephen Street to the east.

The accompanying survey plan within the Architectural Plan Package at **Appendix B** demonstrates the layout of the site, its topographic characteristics, building locations and extent of vegetation cover.

The following photographs have been taken of the subject site.

Figure 1 – Site Photos

Picture 1 – Existing RACF building looking west from the central car park

Picture 2 – Appearance of existing RACF building from the west

Picture 3 – Heritage building from the central terraces

Picture 4 – Heritage building from central terraces, showing residential flat building further to the south

Picture 5 – Grassed area at the north of the site

Picture 6 – Looking north from central car park towards Dillon Reserve

Picture 7 – Heritage building from the top terrace. Former theatre building beyond

Picture 8 – Southern Façade of former theatre wing, from ground level

Picture 9 – Cooper Street elevation of former Scottish Hospital building, looking East

Picture 10 – Cooper Street elevation of former Scottish Hospital building, looking West

4.2 Local Context

The site is located within the Woollahra Local Government area in the suburb of Paddington. Paddington is a highly sought after location that is characterised by high density living in the form of terraces, semi-detached dwellings, apartments and some detached dwellings. The suburb is located between Darlinghurst, Woollahra and Double Bay. The suburb is generally serviced by bus routes which travel to the city and Bondi Junction. The closest railway station is Edgecliff, approximately 1km to the east.

Paddington was developed in the latter part of the 19th Century and reflects this era in its housing and street pattern. Generally, the area has narrow small lots which are occupied by terrace housing up to 3-4 storeys in scale with smaller cottages and single storey detached houses intermingled. The streets are narrow and often heavily constrained by resident parking. The street pattern through the area is generally a simple grid skewed occasionally to a different orientation mainly due to the topography of the area which is generally sloping towards the harbour with a number of ridges which run to the south of the area.

The site is bounded to the west by Brown Street, south by Cooper Street, east by Stephen Street and to the north by Dillon Street reserve, a public park. The site sits within an area of small lots and narrow streets and laneways.

Surrounding the site to the south is the residential suburb of Paddington which extends up to Oxford Street. The local Five Ways shopping village on Glenmore Road provides the closest retail facilities. These are within walking distance of the site, albeit via narrow laneways and across steep grades. The built form along Cooper Street is characterised by a mix of terrace houses and apartments. The scale of the terraces ranges from 2 to 4 storeys.

There are a number of much taller apartment buildings in close vicinity to the site including along Cooper Street which introduce a different scale of 9-10 storeys. These buildings jut up into the skyline, well above the tree canopy and are an aggressive form due to their impact on the silhouette of the area.

The land slopes up from the site towards the south so the backdrop behind the site is comprised of terraces along Cooper Street and larger new development along Glenmore Road.

To the west of the site is a more even built form. It comprises a range of terrace houses of varying scales from 2 storeys to 4 storeys. Immediately adjacent to the site are terraces up to 3 storeys with an effective 4 storey scale which address Brown Street and the side walls of other terraces that address the east west streets and laneways.

To the east is a mixture of scale and development types. There are the taller 1960 apartment buildings to a height of 48 metres down to single storey cottages on narrow lots which face onto Stephen Street. The taller development tends to be located towards the southern end of the street where the topography rises towards Cooper Street. The grain changes noticeably once past Glen Street towards the north where the fine grain terraces and cottages are located.

To the north of the site is a public open space called Dillon Street Reserve. It is a narrow park that extends between Brown and Stephen Street containing a small playground, some vegetation and seating. Beyond the site are more fine grain low scale residential lots which vary in height from 1 – 3 storeys. This playground park is a valued community asset and is well used by residents.

4.3 Site and Context Analysis

A thorough analysis of the site and locality has been undertaken by GMU Urban Design and Architecture, which accompanies this EA report at **Appendix F**. This site analysis addresses various issues presented by the site and surroundings. Extracts from GMU's Urban Design Report address each of the issues below.

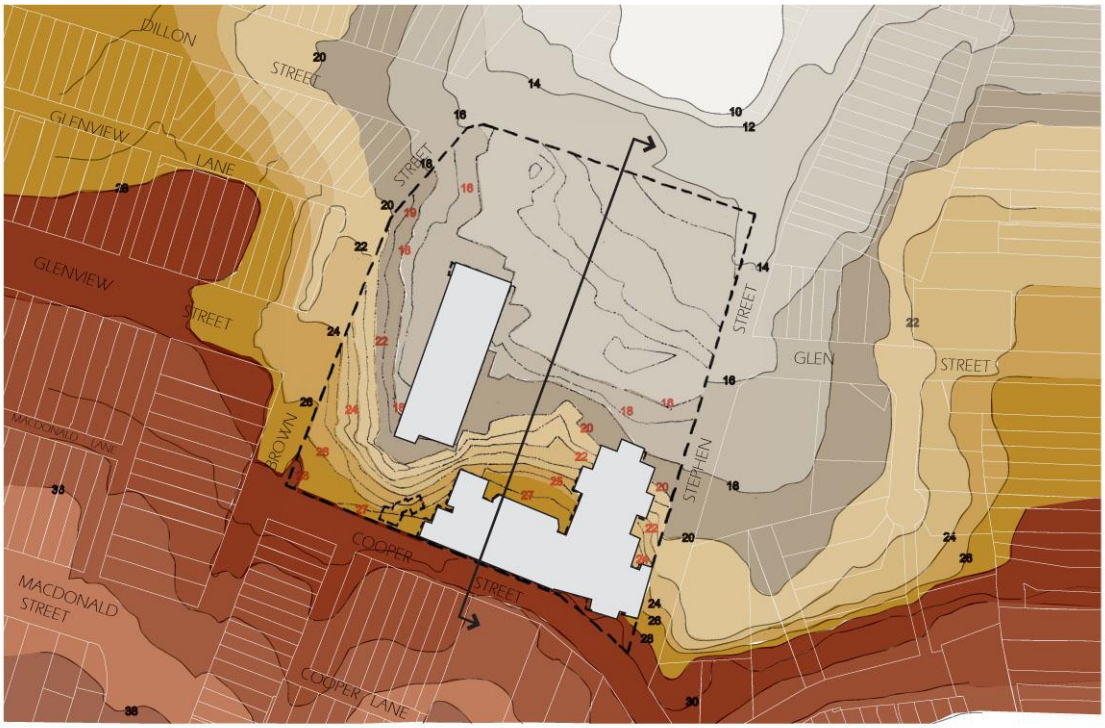
Topography

The site falls dramatically away from Cooper Street with the fall becoming more gradual and levelling out towards Dillon Reserve to the north. There is an approximate 14m difference in level overall.

The grade difference from Cooper Street to the base of the gully is from approximately RL 30 at Cooper Street to RL 20 roughly one third of the way into the site. A stone retaining wall runs along the western boundary and maintains Brown Street at a higher level to the site. There is a more significant level change towards the intersection with Cooper Street where paved terracing has been constructed. The streets around the site do not have a similar gully and sudden change in level. Both Brown and Stephen Streets follow the topography and fall more gradually to the north. Brown Street changes from approximately RL 23 close to the site at Cooper Street down to RL 16 at the north west corner of the site as a gradual grade. Stephen Street falls from RL 30 at Cooper Street to RL 14 at the north eastern corner of the site with a quick grade change immediately to the north of Cooper Street, accommodated by stairs and then a gradual grade change from RL 22 to RL 14 along the roadway itself.

The land is noticeably flatter to the north than around the site and to the south. The topography to the south rises at a similar grade to the grade around the site, with the ridge line located approximately at Oxford Street. This is shown on the following diagram.

Figure 2 – Topography Diagram



Topography

Vegetation

The landscape character of the site is one of its more significant features. It contributes to the streetscape setting around the site and provides one of the rare pockets of vegetation in the area.

Vegetation on the site comprises a large range of plant species including remnants of early cultivation of the site for utilitarian and ornamental purposes from the 1840s. Planting in more recent times has been carried out for amenity purposes only resulting in a confusion of the original Victorian garden and the later institutional garden created during the use of the site as a hospital. There are also a significant number of local native plant species located on the site.

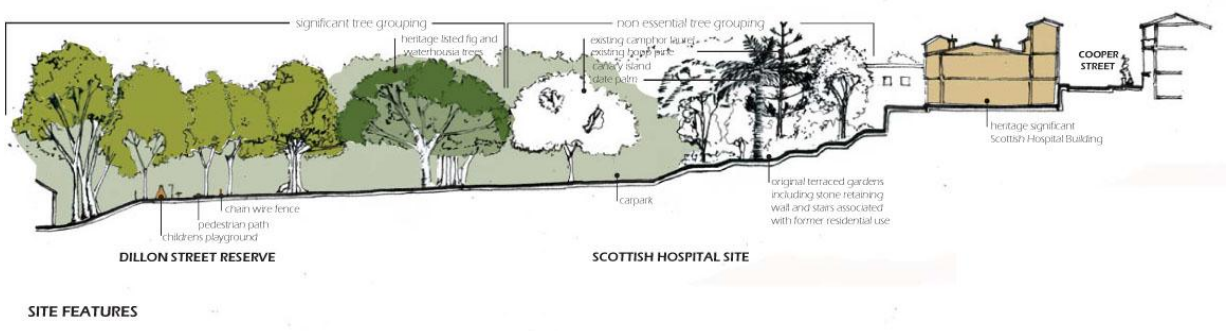
To Cooper Street there is little landscape other than near Brown Street where the gully figs are visible. To Stephen Street the plantings are of low quality but do provide some screening to the operating theatre although it is still a highly visible massing even through the trees. To Brown Street the heritage trees create the street edge and the sense of enclosure and reduce the visible impact of the existing development.

A number of significant and heritage trees are located on the site, identified in the Tree Wise Men Australia Pty Ltd report (**Appendix G** of the Project Application EA Report – November 2010) and in the Musecape report (**Appendix H** of the Project Application EA Report – November 2010). These reports have identified trees to be retained and protected, the extent of tree Protection Zones, and trees and weeds that are intrusive and may be removed.

Figure 3 – Tree Protection Zones

Tree protection zones

Figure 4 – Site Features Section



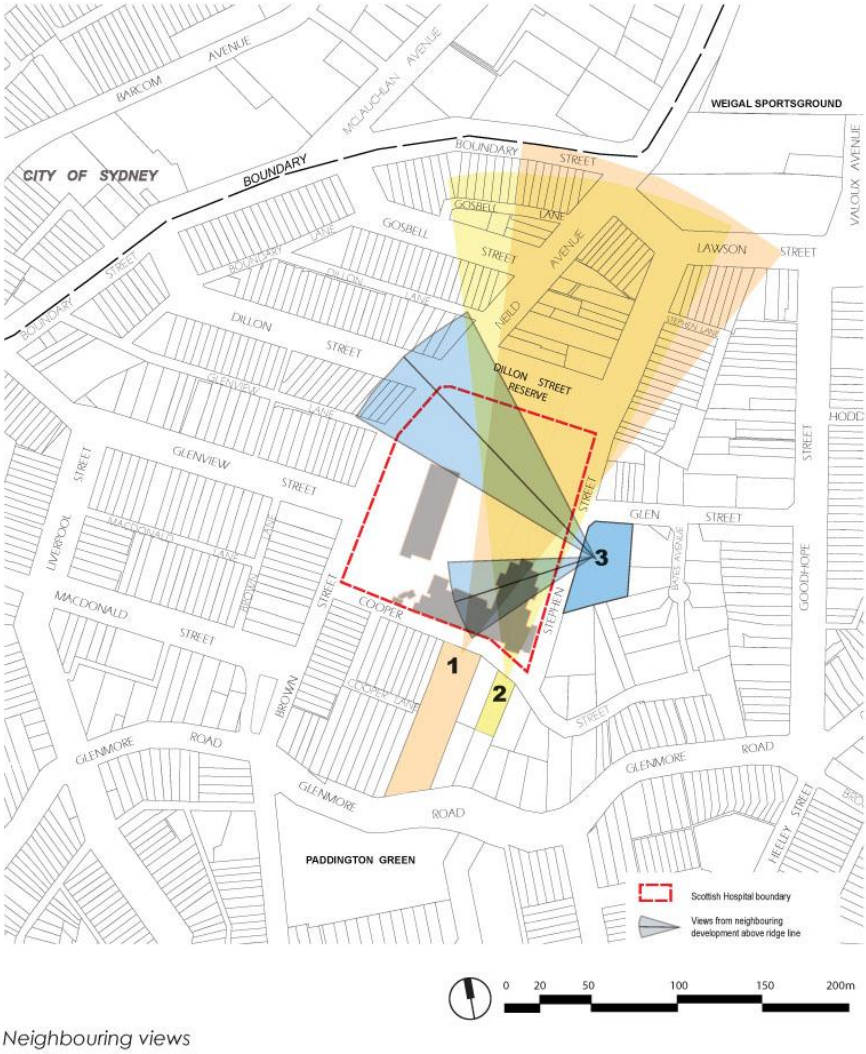
Views

The site itself is part of the outlook for much of the existing development around the site. As the buildings on the site sit, for the most part, below the tree canopy, the predominant outlook for dwellings around the site, and along streets surrounding the site, is onto greenery. The dwellings along Cooper Street and along Stephen Street where tall newer development is located do benefit from views across the tree canopy on the site with some water glimpses and district views available from apartments and upper floors of terrace housing over the site, particularly from the southern side of Cooper Street.

Green, heavily vegetated edges characterise the view looking down Stephen Street to the north.

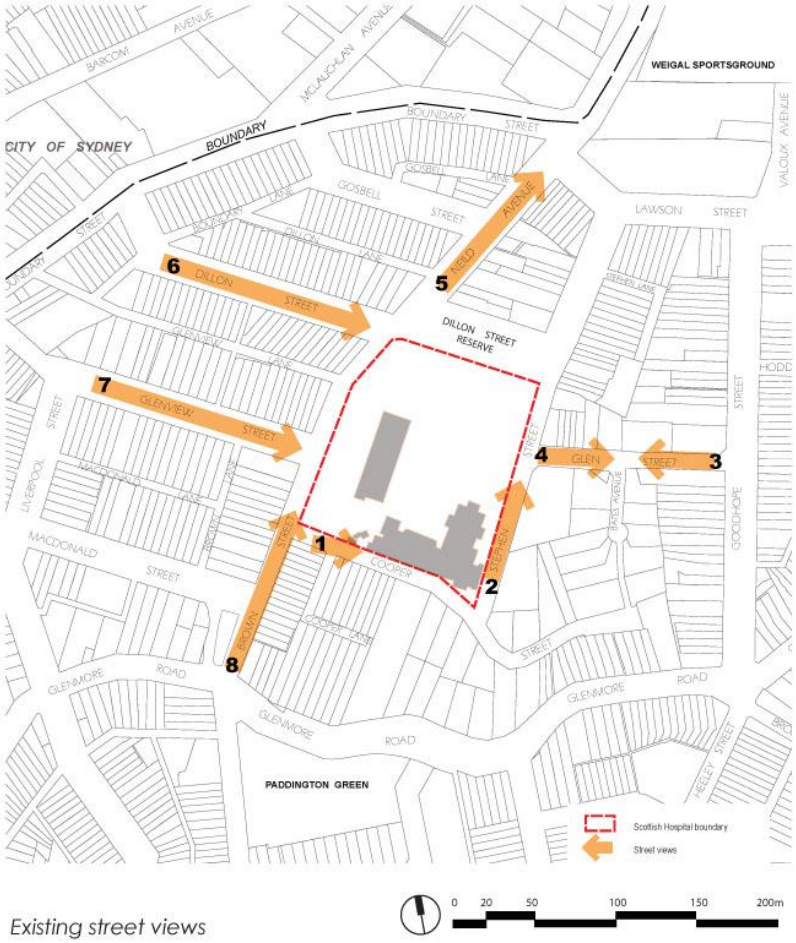
There are street views looking west down Glen Street which terminate at existing vegetation mid way along the site's eastern boundary. There is also an axial view looking up Glen Street away from the site which is clear and legible to the top of the street.

Figure 5 – Neighbouring Views



Neighbouring views

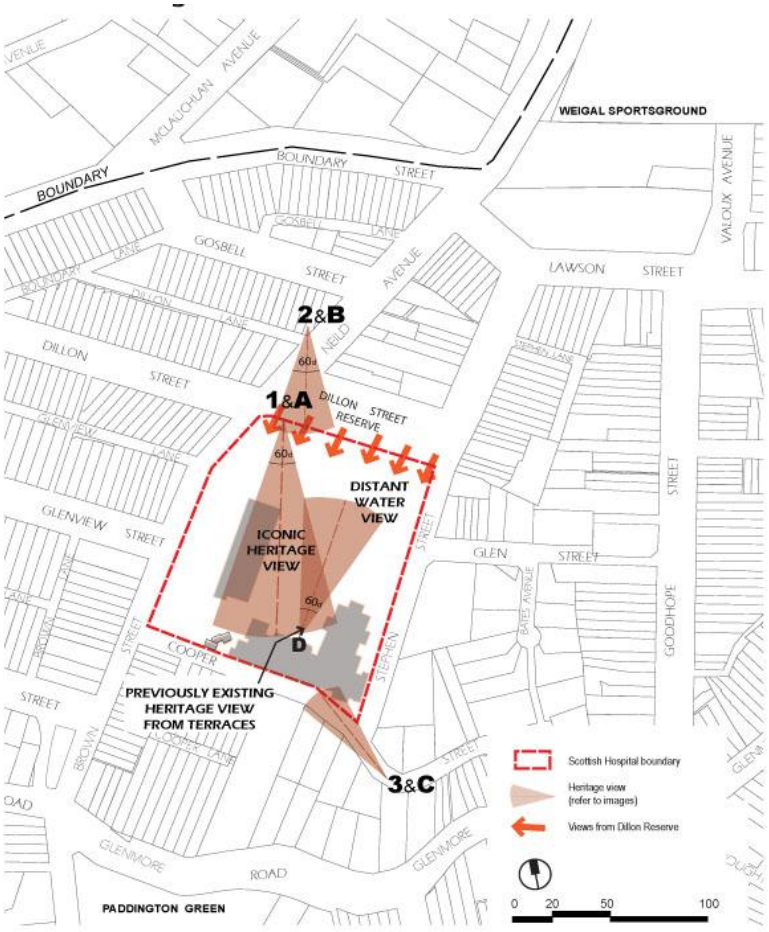
Figure 6 – Existing Street Views



Existing street views

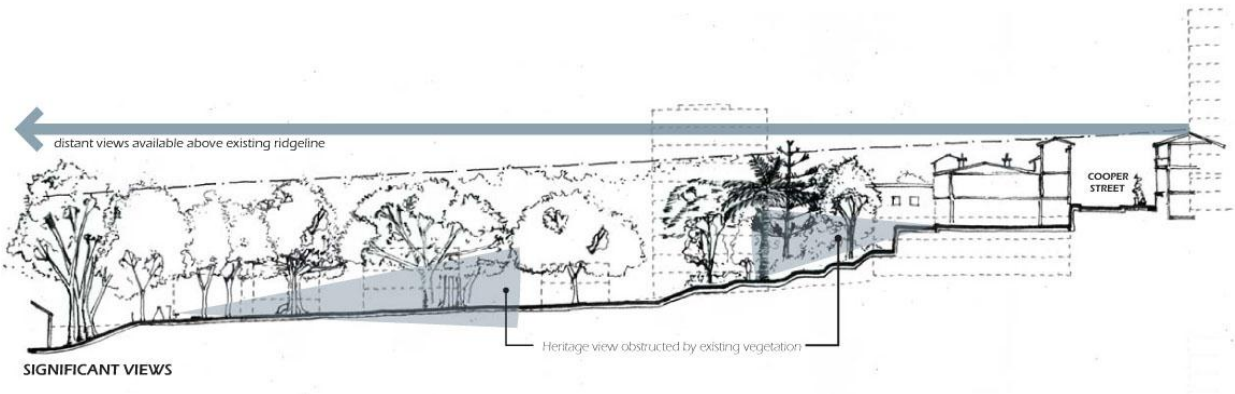
The Conservation Management Plan for the site (**Appendix I** of the Project Application EA Report – November 2010) identifies a number of heritage views linking the former residence with the site entrance and open space to the north, and also views to the former residence from the public domain along Cooper and Brown Streets.

Figure 7 – Heritage Views



Heritage views

Figure 8 – Significant Views Section



Geotech

The site is underlain by Hawkesbury Sandstone of Triassic age on the western boundary and south-west corner. The bedrock is mantles by man-made fill overlying alluvial and estuarine deposits, comprising mainly peaty quartz sand, silt and clay, within the remainder of the site.

The Hawkesbury Sandstone is generally well cemented and only in a few localities is there significant intergranular flow and little correlation between individual bores. Most water is encountered in the Hawkesbury Sandstone in fractured zones and bedding plane partings, the latter particularly in weathered zones.

Sandstone crops out in a few locations in the south western corner of the site. The sandstone appears to be undercut at one location, suggesting a weaker layer that has been subject to weathering. A few detached boulders were adjacent to the sandstone outcrops.

The central section of the site is terraced and appears to have been constructed using filling. A retaining wall at the top of the terraced slope comprises dry stacked sandstone blocks.

The ground surface below the operating theatre is deeply eroded at one location mid-way up the slope. The erosion gully indicates that filling comprising sand and bricks has been placed in the upper 400mm of the subsurface profile.

Access Points and Connectivity

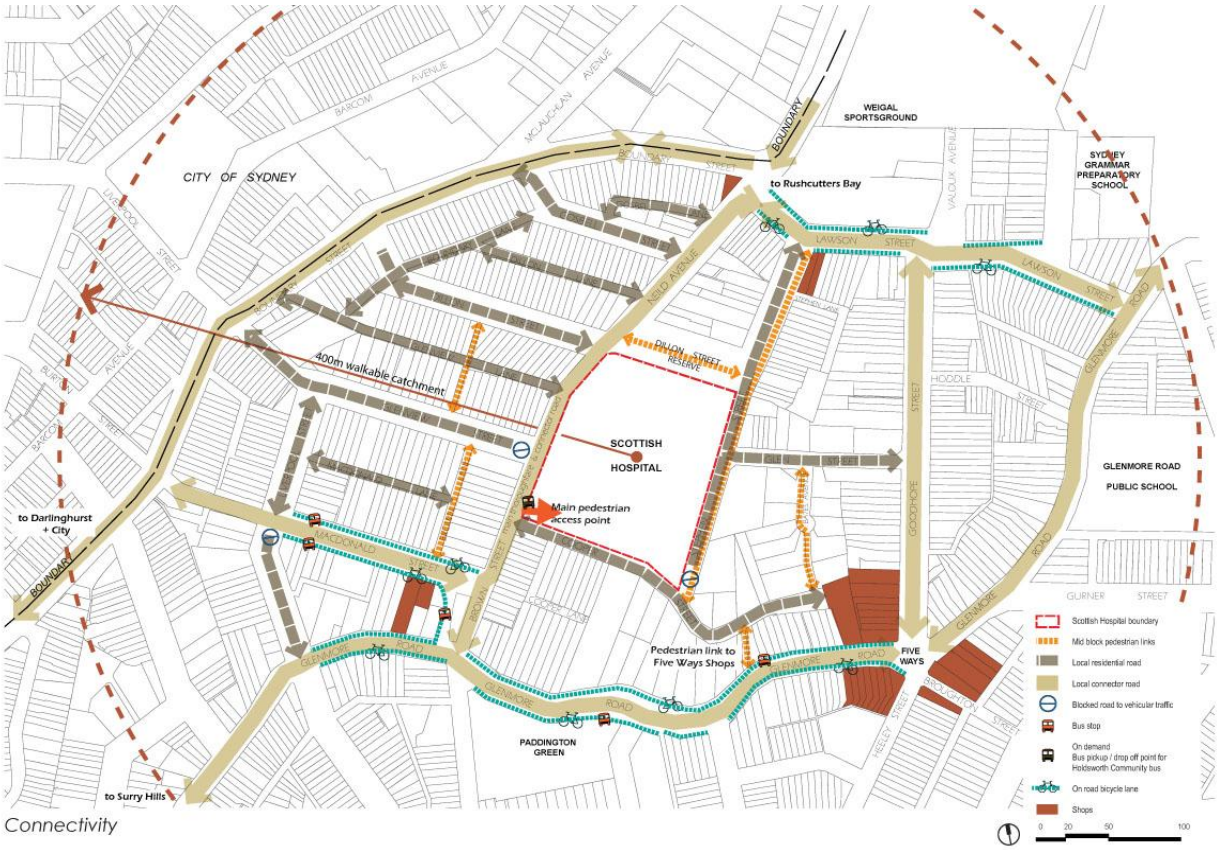
The topography of the site and the area creates issues for connectivity. The site has development cut into the slope and therefore there is a significant grade change from Stephen Street through the site and across to Cooer Street. This change in topography fragments the street pattern and pedestrian connectivity at the site.

For the site, vehicular access is limited to a single driveway entry along Brown Street in the north western corner of the site. This appears to be the original driveway location which served the heritage house. There also used to be a vehicular entry point from the southern end of Stephen Street to the disused operating theatre building that has since been blocked off.

Public transport services the precinct. The nearest bus route is the 389 Sydney Buses service which operates between Sydney City and Bondi Junction. The closest stop to the site for this service is on MacDonald Street, less than 400m walking distance from the site.

The local retail facilities are to the south east at the Five Ways shopping precinct, within 400m walk of the site. The access is via a pedestrian laneway from Cooper Street.

Figure 9 – Connectivity Diagram



Built Form Character

The surrounding built form has a predominant 3-4 storey fine grain scale to the western side of the site along Cooper and Brown Streets. The lower scale development of cottages and terraces tends to be located further to the north once past Glen Street and Dillon Street Reserve. The lot pattern to the north exhibits shorter and narrower lots and a generally tighter street pattern with laneways systems. To the south the development pattern changes with the more recent developments occupying larger footprints and in some instances amalgamating land parcels. This introduces a different grain from the north to the south with the north comprising a mixture of narrow lot frontages, deeper lots and then wider lots and larger buildings to the south.

The building typology also changes with the smaller terraces and cottages to the north giving way to larger apartment buildings from a number of different eras. This occurs towards the south of Stephen Street and along Cooper Street particularly to the eastern end of that street, and the site.

The most recent apartment developments have introduced a very different scale at 8-9 storeys at the street, and are elongated along the lot.

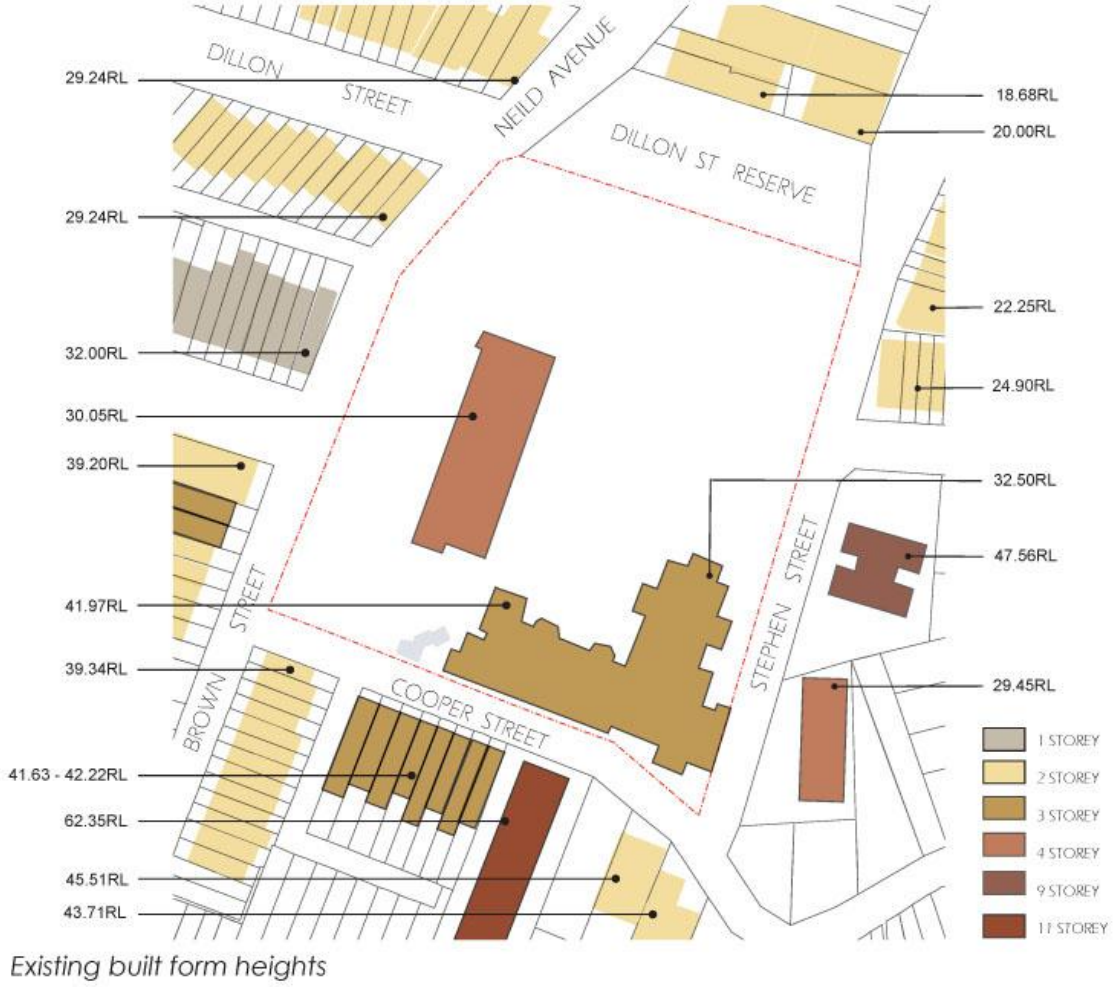
The development on the site itself contrasts sharply with that of the surrounding area. The character is that of buildings within a landscape setting when viewed from Brown, Stephen Street and the reserve. The character changes when viewed from Cooper Street. The historic hospital and house on this frontage present the appearance of quite a dominant built form due to their zero-lot frontages, in contrast to the terrace forms on the southern side of this street.

The diagram below demonstrates the change in lot configurations from the north to the south of the site.

Figure 10 – Figure Ground Surrounding the Site

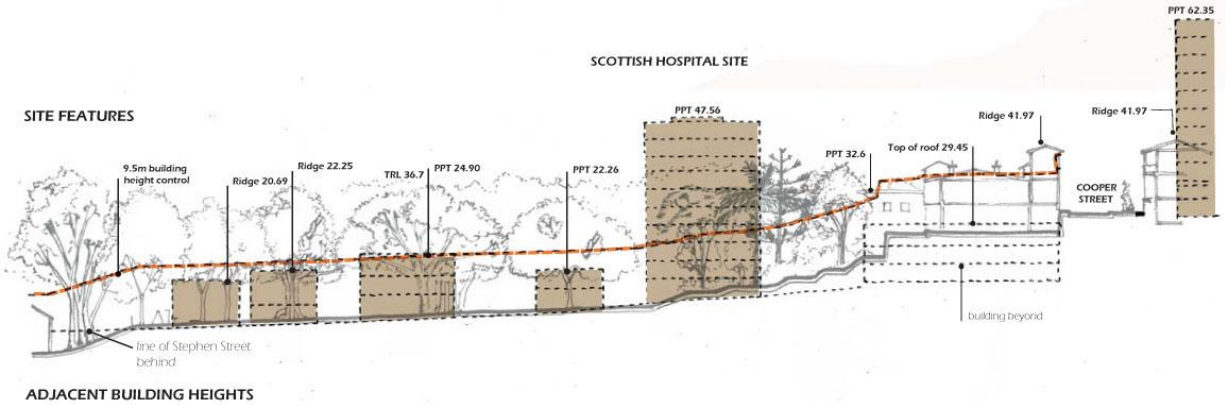
The relative heights of existing buildings both on and surrounding the site are shown in the diagram below.

Figure 11 – Existing Built Form Heights



Existing built form heights

Figure 12 – Adjacent Building Heights Section



Key Site and Context Issues

The urban design analysis identified a number of key issues facing any development of the subject site. These include:

- The heritage views particularly from the heritage terraces towards Dillon Reserve, which is heavily screened today by vegetation.
- The extensive area of the site occupied by heritage trees, their impact on the location of built form and the potential amenity and solar access of any development as well as the overshadowing impact on development and any external open space.
- The constrained access for residents from the site to the bus stop at MacDonald Street due to the existing topography of Brown Street although it must be remembered that the site is currently used as a residential aged care facility and residents manage this issue at present.
- The heritage listing on the historic hospital/dwelling and its current dilapidated state.
- The steep topography to the north of the site which drops the site levels well below Cooper, Brown and Stephen Streets in the form of a gully.
- The axial vistas down east west streets that terminate at the site which currently offers a 'green view' and the view from Dillon Street Reserve towards the site which is also a landscape vista.
- The shutting down of the hospital which has changed perceptions of the site from that of a busy operational facility and has seen the site become quite overgrown.
- The exceptional landscape character of the site and its heritage value which means that any development must seek to retain as many trees as possible to maintain landscape edges to the site and screen further development, and retain the significance of the site. This will dictate the location of building footprints to avoid damage or impact on the trees and constrain their locations.
- The existing landscape views and heritage views provide the opportunity to reinterpret the heritage terraces view through extension of the landscape from Dillon Street Reserve up to the heritage house by keeping the existing trees, reinstating the terraces and providing appropriate landscape on the terraces as well as thinning the existing vegetation which is not of value to open up the views from the reserve to the heritage house.
- The mature plantings and significant drop within the site provides the opportunity to achieve taller buildings within the site if they are located to sit within the tree canopy and contained by the trees away from the street edges. This will follow the existing approach to development on the site.
- The northern portion of the site already contributes to the 'openness' of the reserve and visually extends the public reserve. The previously approved DA located buildings close to this reserve which would have changed its character significantly. There is an opportunity to expand the park through a VPA or other mechanism to provide a wider and more extensive park that also maintains the heritage and significant trees within public ownership and keeps the current landscape setting of the site to the north in perpetuity.
- There are a number of views down to the site from adjacent streets, most particularly Glen Street. This vista needs to be balanced with the importance of the landscape setting of the reserve as it is only a short street and is not a major connector. However the development should respond to this vista either through landscaping or termination by appropriate built form.
- The location and extent of trees limits the open ground for building on the site. New development should seek to locate the building footprints in similar positions to the existing buildings and between trees.
- The existing heritage buildings on the site are a major built form element in the character of the site. Redevelopment provides the opportunity to adaptively reuse the heritage hospital and ensure any new development adjacent to it on Cooper Street responds to its scale whilst also allowing views into the site to the landscape.

- To minimise disruption to the surrounding street network and amenity impact, the existing entry points should be maintained with the vehicle entry for cars and visitors from the existing entry on Brown Street and only servicing from Stephen Street as may have occurred previously when the hospital was operational.
- There is the opportunity to look at widening Stephen Street at the northern end of the site to provide easier access along the street given its very constrained nature.

Figure 13 – Constraints Diagram

Figure 14 – Opportunities Diagram

5 The Proposed Development

5.1 Description of Project

5.1.1 Demolition

Consent is sought for demolition of the following buildings on the site:

- The existing nursing home building along the Brown Street frontage;
- The now disused Stephen Street former theatre wing;
- Elements of the Cooper Street building (former Scottish Hospital) which do not hold heritage significance;
- All ancillary structures on the site, including those around the Brown Street vehicular entrance.

In addition, a number of trees are proposed for removal. In the main, such trees have been assessed as being of low conservation value, or are considered to be intrusive in the quality of landscaping on the site.

A demolition plan has been prepared by JPR Architects, and accompanies this application at **Appendix B**. The Demolition plan shows all structures proposed for removal.

The Landscape plan at **Appendix J** to this PPR report and the Arborist plan at **Appendix G** of the Project Application EA report (November 2010) detail all trees and other vegetation proposed for removal.

5.1.2 Land Use and Floor Area

The proposed scheme includes the construction of a new Residential Aged Care Facility (RACF) accommodating 100 beds, 20 of which are dedicated to Dementia Care. In addition, 79 Independent Living Units (ILUs) are proposed to be accommodated in five separate buildings.

Resident services proposed include a café, reading library, gym and hydrotherapy pool, games room, meeting room, and 114m^2 of space allocated for the provision of on-site services for direct delivery to residents (such as hairdresser, visiting doctor, and other specialty service providers). These services will not be available to the general public.

The following Gross Floor Areas are allocated to each respective use. GFA calculations have been undertaken in accordance with the definition contained within *State Environmental Planning Policy (Housing for Seniors and People with a Disability) 2004.*

For comparative purposes, the total GFA of Option B (providing servicing access from Brown Street) is also provided in the table below. This shows an increased GFA of 228.91m^2 from the preferred servicing option.

Table 2 – GFA Allocation

Building Name	No. ILU Dwellings	No. RACF beds	GFA –Preferred Servicing option off Stephen Street	GFA – Option B Servicing option off Brown Street
Brown Street ILU	52ILUs		7,445.32m^2	7,445.32m^2
Heritage ILU	9 ILUs		1,999.95m^2	1,999.95m^2
Gatekeepers Lodge ILU	4 ILUs		6,82.27m^2	6,82.27m^2
Stephen Street ILU	10 ILUs		2,025.16m^2	1,913.17m^2

Stephen Street RACF and ILU	4 ILU	100 beds	6,795.5m^2	7,027.4m^2
Total	**79 ILUs**	**100 beds**	**18,948.2m^2**	**19,177.11m^2**

5.1.3 Built Form

The proposed seniors residential development will comprise a number of buildings on the Scottish Hospital site, which will serve different purposes and respond to different site conditions and context.

Each building is described in detail below. Updated detailed architectural plans have been prepared by JPRA and Flower & Samios Architects, which accompany this EA at **Appendix B** and show the proposed building designs.

Brown Street ILU

The Brown Street ILU is situated to the west of the site, running north-south roughly parallel to the Brown Street frontage. The building comprises a maximum of eight storeys above ground level (being part 5 and part 6 storeys above street level), with a maximum overall height of 28.6m from natural ground level (max RL 42.590m AHD to top of lift motor room and 41.740mAHD to uppermost roof). The building has been designed with an articulated frontage to Brown Street. The setbacks of the major building elements closest to Brown Street range from 8m to 17.5m. Above street level, the building element which projects the furthest forward is 8m from the Brown Street boundary. The building then steps back to 14m and 17m from the boundary at the closest points.

This building accommodates a majority of the ILUs on the site, as well as community facilities at the ground floor level. The apartment composition is as follows:

- 10 x1 bedroom apartments
- 19 x 2 bedroom apartments
- 23 x 3 bedroom apartments

Community uses within the building include:

- community room,
- games room,
- reading library,
- gym and hydrotherapy pool.

Direct lift access is provided from the basement car parking levels to the ground floor lift lobby and each of the residential floors.

A pedestrian bridge is proposed to link level 4 of the Brown Street ILU building to Brown Street, providing direct access for residents to the public street.

Additional details for the proposed building materials are included in the finishes board within the Architectural Plans at **Appendix B**.

Gatekeepers Lodge

The 'Gatekeepers Lodge' is located along the Cooper Street frontage of the site, to the west of the Heritage ILU building. This small building is four storeys overall but presents as a two storey terrace-house form to Cooper Street, with two storeys below street level. The maximum height of this building is 14.6m from natural ground level below (max RL of 38.265mAHD) and effectively 8.2m from the level of Cooper Street. The building accommodates a three bedroom apartment on each level. In total there will be

- 4 x 3 bedroom apartments

A resident accessway to the south of the building at the Cooper Street level forms part of the accessible path linking all buildings on the site. As part of this system, a bridge and ramp link this building with the Brown Street ILU building, at its third level.

Heritage Building ILU

An adaptive re-use conversion of the heritage listed former Scottish Hospital building is proposed to accommodate nine apartments. As described above, some non-contributory fabric forming part of the existing Scottish Hospital building will be removed, and sympathetic additions will be made to this building to conserve its heritage value yet enable it to be adapted to a new purpose.

This building, currently over part 2 and part 3 levels will be adapted internally to accommodate the new apartments. Two new apartments will be constructed within the existing roof space, with no change to the overall height of the building (max RL 41.74m AHD). The lower level will be adapted to accommodate a two-bedroom apartment.

It is proposed that this building will accommodate:

- 1 x 1 bedroom apartment
- 5 x 2 bedroom apartments
- 3 x 3 bedroom apartments

In addition to these apartments, storage areas are proposed in some of the existing rooms along the southern side of the building fabric at Level 5. To provide articulation to Cooper Street, sunken gardens are proposed below street level to allow for the growth of vegetation between the building and the street.

Some alternations are proposed to the Cooper Street façade of the heritage building to remove intrusive fabric and to reinstate original windows.

Stephen Street RACF and ILU

The Stephen Street Residential Aged Care Facility (RACF) and ILU building is proposed to be situated towards the eastern boundary of the site fronting Stephen Street.

This building is proposed to be constructed over six levels, to a maximum height of 18.3m from natural ground level below (max RL 38.3 m AHD to top of clerestorey roof form). The ground floor level will accommodate the building entry, servicing and community facilities, as well as administration offices for the site operators. Levels 1-4 will accommodate high care beds for frail aged and dementia patients, whilst level 5 will accommodate 4 serviced ILU apartments.

The building will step back from Stephen Street as it moves northwards. Detailed setback distances are shown on the Architectural Plans at **Appendix B**, however in general, setbacks range from approximately 2.5m at the southern end of the building to 7.03m.

The building's articulation, as well as some elements of the internal and external façade design have been amended from the original project application. The internal design at the northern end of the RACF building has been adjusted to enable this area of the building to read as being residential in nature when viewed from Stephen Street. The location of the internal lounge area and street front bedrooms on level 5 and 6 have been switched, providing a north easterly aspect to the lounge area. This will now read from the street as being a living area with balcony instead of residential bedrooms.

Stephen Street ILU

This building is proposed to be located north of the Stephen Street RACF building, but still towards the eastern boundary of the site. It will be 5 storeys in total, with a maximum height of 17.3m from natural ground level to top of lift over-run (max RL 32.8m AHD to top of lift over-run) and 16.1m to top of roof (max RL 31.6m AHD to top of roof). The building will step down to present as a 3 storey form towards the north.

Setbacks to Stephen Street for this building range from 6.1m at its closest point to approximately 7m.

It is proposed that the building will accommodate a residents' common room at the ground floor level, fronting open space to the north, as well as a meeting room for the site operators. Level 1 will accommodate a staff meeting room, community room and two apartments. Levels 2 – 4 will also accommodate 2 apartments each. In total there will be:

- 2 x 2 bedroom apartments.
- 8 x 3 bedroom apartments.

Materials and Finishes

Materials and finishes to be used for these buildings include:

- Dry Pack stone wall for the building base elements.
- Painted masonry and Profiled Aluminium boarding for the external walls.
- Metal clad roofing.
- Vertical shading louvers for balcony privacy.
- Aluminium framed glazing.

Additional details for the proposed building materials are included in the finishes board within the Architectural Plans at **Appendix B**.

5.1.4 Operation and Maintenance

Staffing numbers for the site will range from 70-100 employed people, being a net increase of up to 30 staff from the current operation. At any one time there will be a maximum of 20-30 staff present on the site.

The main shift times for the Aged Care Facility are:

- 0600 – 1500
- 1430 – 2300
- 2230 – 0700

PAC will employ maintenance personnel to adequately maintain the property – both the buildings and the landscaping. Routine maintenance would be placed in a maintenance schedule and contract with suppliers set up so that services are performed to plant and equipment items when they are due for maintenance.

5.1.5 Open Space and Landscaping

A range of open space areas are proposed to be provided across the site. Updated detailed plans for these areas have been prepared by Aspect and are included at **Appendix J** to this EA report. A total of 8,147.47m^2 of landscaped open space is provided on the site, which equates to 56.12% of the total site area. The total deep soil area is 7,211.04m2, equating to 88.51% of the total landscape area.

Communal Open Space

Communal open space on site will be provided in dedicated areas servicing differing purposes. The large area of garden towards the north of the site will be landscaped in accordance with the accompanying Landscape Plan, for its intended use as passive and active recreation for site residents and their visitors.

The landscape design proposes to incorporate a range of features including:

- Community garden beds for the planting of vegetables by residents.

- Exercise and wandering areas.
- Reinterpreted landscaped terraces and retention of heritage significant walls and stairs.

A range of Water Sensitive Urban Design opportunities are illustrated within the landscape drawing package. These include harvesting and directional management of unutilised storm water run off to in ground soak lines and planted swales for irrigation purposes. Increasing natural ground water availability to trees and plants for longer periods at more times.

Dedicated open space will be provided for dementia care patients in the form of a dementia walk in the area between the RACF building and the terraced gardens.

The terraced gardens will be reinterpreted and planted with shrubs and hedges. They will not be accessible to residents but will provide a green link between the heritage building and the lower portion of the site.

Informal open space areas will surround the buildings and will be used as significant planting areas, helping to retain the treed character of the site.

Public Open Space

There is an existing paved area at the corner of the site at the intersection of Brown Street and Cooper Street. This was previously used as a vehicular access point, with vehicular gates located on the fence line. It is understood that this paved area is currently used as a location for a community bus drop-off and pick-up point.

It is proposed that this paved area be reconstructed, and presented as a community space available for use by the community bus. The landscape plans by Aspect present a design for this area, with formalised seating.

Private Open Space

Private open space areas are provided for each of the independent living units in the form of balconies off main living areas. Two of the ILUs at the ground floor of the heritage building will also have ground level private space adjacent to their terrace areas.

Stephen Street Landscaping

The original proposal for landscaping along Stephen Street in the vicinity of the RACF building was to remove low retention quality species from this boundary and replace with more appropriate vegetation. This approach was questioned by residents of Stephen Street as it was perceived that this would significantly reduce landscape screening and result in adverse streetscape and amenity impacts. To address this issue, it is proposed to stage the replacement of vegetation in this location as detailed on the Aspect Plan Ref SK 04 Rev B at **Appendix J** to this report. This strategy proposes to remove part of the non significant vegetation and replace it with new and transplanted species whilst retaining the remainder of the non-significant vegetation in the short term. Retention of this vegetation will provide some screening of the RACF building from the street until the new vegetation has time to grow and establish itself. When the newly planted vegetation is established, the remaining vegetation to be removed and replaced with new plantings which will also grow to increase the vegetation screening along Stephen Street.

Whilst this 'Option 3' for landscape treatment along Stephen Street is seen to be the best approach to ensure vegetation screening is retained along this frontage, as it facilitates a more neutral transition and maintains greater foliage volume more consistently over time and incorporates other mature Palm stock transferred from the site, two other landscape options are also suggested and detailed in the Aspect landscape drawings. These options include:

<u>Landscape Option 1:</u>

- All weed trees along the Stephen Street frontage are to be removed and replaced with an advanced stand of Waterhousia floribunda. Refer Plan ref SK 02 Rev B "Option 1 Proposed Stand of Advanced Waterhousia floribunda" at **Appendix J**.

Landscape Option 2:

- Four selected weed trees will remain at the initial planting stage with infill planting of an advanced row of Waterhousia floribunda. Weed trees are proposed to be removed in 3-6 years and replaced by an additional Waterhousia floribunda. Refer Plan ref SK 03 Rev B "Option 2 Infill planting of Waterhousia floribunda with Staged Removal of Selected Weed Trees" at **Appendix J**.

Landscape Option 3:

- Four selected weed trees will remain at the initial planting stage. With addition of advanced palms transplanted from the site and infill planting of 8 advanced Waterhousia floribunda. Weed trees are proposed to be removed on 3-6 years and replaced by an additional two Waterhousia floribunda. Refer Plan ref SK 04 Rev B "Option 3 Infill Planting of Waterhousia floribunda and Transplanted Palms with Staged Removal of Selected Weed Trees" at **Appendix J**.

Should the Department not agree with the proposed landscaping approach to this boundary, the proponent would not raise issue with a condition being imposed on any consent issued, requiring the implementation of Landscape Option 1 or Landscape Option 2, in accordance with plan ref SK 02 Rev B or plan ref SK 03 Rev B prepared by Aspect as detailed at **Appendix J** to this report.

5.1.6 External Site Improvements

In order to ensure a continuous accessible path of travel from the site to the 389 Bus Stop on MacDonald Street, a number of minor upgrades are proposed to footpath ramps external to the site. These are detailed within the Accessibility Report at **Appendix K** of the Project Application EA Report (November 2010) and Traffic report at **Appendix L** of this PPR EA report, and include the following:

- Conversion of the existing speed hump adjacent to the site in Brown Street to a formalised pedestrian crossing.
- Inclusion of kerb ramps at the intersection Brown Lane and southern side of Glenview Street.
- Inclusion of kerb ramps at the intersection of MacDonald Lane and eastern side of Liverpool Street.

Discussions have been entered into with Woollahra Council regarding the undertaking of these works on public land.

5.1.7 Vehicular Access, Pedestrian Circulation and Parking

Resident, Visitor and Staff Vehicular access, circulation and parking

The main vehicular access to the site is proposed to be retained at the existing Brown Street entry, albeit through a slightly reconfigured entrance point to meet the security requirements of PAC. This entrance will be used by all residents, visitors and staff.

An at-grade drop-off plaza is proposed between the Stephen Street ILU and Brown Street ILU building, which will act as a shared zone. This will provide for the pick-up and drop-off of residents by friends/relatives, taxis or patient transport services.

The total number of car parking spaces proposed to be provided on the site is 132.

- Basement car parking will accommodate a total of 124 resident, visitor and staff car parking spaces. A single ingress ramp is proposed under the Stephen Street ILU building, accessed via the internal drop-off/pick-up plaza. Egress from the basement car park will be via a ramp below the Brown Street ILU building, leading directly to the egress driveway to Brown Street.
- An additional 8 visitor spaces are proposed to be located at grade adjacent to the site's Brown Street vehicular entry.

All parking will be designed in accordance with AS 2890.1/6 (adopted in May 2011 by the Building Code of Australia) requirements for the appropriate user class. This requires that a shared space be provided between dedicated accessible car parking bays, to accommodate lay-off requirements for persons with disabilities. The dimension of the shared space is the same as that of a regular car space, yet a bollard is installed to prevent use of this space for car parking purposes. This effectively means that for every two accessible spaces provided, three 'regular' sized car parking bays are required. The basement car park configuration reflects this requirement.

Services delivery

The Preferred Project retains the Stephen Street access to the loading dock, as originally proposed. This loading dock is situated in close proximity to back of house functions at the ground floor of the ILU building.

The following delivery movements are anticipated:

- Food deliveries 6-8 times per week off Stephen Street.
- Laundry deliveries 1 per day.
- Facility consumables delivery would fluctuate week to week depending on quantities of products required, off Brown Street.

It is proposed that all deliveries be undertaken between 7am and 6pm daily.

The types of vehicles that will service the facility include:

- Laundry truck – 2.8m high and 6.5m long
- Cook-chill meal delivery – 3.5m high and 7-10m long
- Fruit and vegetable delivery – 3.3m high and 7m long
- Dairy products – 2.8m high and 5m long
- Chemical goods – 3.5m high and 7-8m long.

From experience at other PAC facilities, deliveries do not occur with a definite frequency as goods are only ordered from vendors to replenish exhausted stores stock in the facility. Small non-bulky goods would be delivered through the Brown Street entrance, an example of this is stationery items.

As described in section 2.4 of this Preferred Project EA report, the proponent acknowledges that neighbouring residents have raised concern with the location of the loading dock off Stephen Street. In response, an alternate design arrangement has been drafted, providing vehicular access to the loading dock from within the site. Plans are provided which show the proposed arrangements, and accompany this report at **Appendix B**.

The alternative solution proposes that vehicular access be gained from the existing Brown Street site entry, and a new driveway ramp be constructed between the Stephen Street ILU building and the open space at the north of the site.

Whist achievable in a physical sense, this design solution is not considered to be favourable. The following tables list the positive and negative aspects of each option.

Loading Dock off Stephen Street

Positives	Negatives
• Simple inexpensive system	• Adds an additional 11-13 delivery vehicle traffic movements in an average week to Stephen St, with associated minimal noise and pedestrian/traffic impacts.
• Allows deliveries to occur close to all key storage areas, reducing operational costs	• Removes 2 parking spaces from Stephen St
• Minimises distance to take food deliveries which under Food Authority requirements have to maintain certain temperatures	
• Separates delivery vehicle movements from seniors pedestrian and car movements on site, improving safety	
• Marginally reduces traffic on Neild Ave / Brown St	
• Maintains more acceptable connection between Stephen St ILU building and park	

Loading Dock accessed from within the site

Positives	Negatives
• Maintains existing Stephen St parking and traffic arrangements	• Significantly increased capital expense, with greater underground floor space required and associated excavation
	• Increases operational costs as deliveries further from key storage areas
	• Increases distance to take food deliveries which under Food Authority requirements have to maintain certain temperatures
	• Places delivery vehicle movements into zones with seniors pedestrian and car movements on site
	• Marginally increases traffic on Neild Ave / Brown St
	• Reduces amenity of day care centre room's (at bottom of Stephen St ILU) visual access and connection to park area

Despite there being a much greater weighting from the proponent's perspective in favour of the Stephen Street loading dock entrance as proposed, the proponent would find it difficult if the Department placed a condition on any consent issued requiring that servicing be undertaken from within the site, as per the Option B plans provided as supplementary to the main architectural plan set at **Appendix B** to this PPR.

Pedestrian Circulation

The site has been designed to accommodate a continuous accessible path of travel to and between all buildings from site entrances at Brown Street (vehicular and pedestrian) and the corner of Brown and Cooper Streets (pedestrian).

Pedestrian ramps, pathways and accessible lifts have been designed into the buildings and landscape design to ensure all residents are provided equitable access throughout the site.

- Accessible lifts provide access from level 1 of the Brown Street ILU building (ground level) to all levels of that building.
- A pedestrian bridge is proposed to link Level 2 of the Brown Street ILU building with the pedestrian footpath on the eastern side of Brown Street.
- A pedestrian bridge is proposed to link the Brown Street ILU building Level 3 to the lowest level of the Gatekeepers Lodge building.
- A lift at the retail arcade level of the Stephen Street RACF building (Level 1) links a pedestrian way through the Heritage Building at Level 5, which then links through via a ramp to the community pick up point at the corner of Brown Street and Cooper Street.

An accessible path is provided from the lobby of the RACF building to the lobby of the Brown Street ILU building, adjacent to the south of the vehicular circulation zone.

Further details are provided on access, traffic and circulation in the Transport Assessment prepared by Halcrow, included at **Appendix K** to this PPR.

5.1.8 Operational Management

An Operational Management Plan for the site has been drafted by PAC, which addresses factors such as:

- Site operation and composition of residential facilities
- Community facilities
- Site access and egress control
- Site security
- Staff
- Maintenance
- Emergency services
- Waste management.

This OMP will guide the day-to-day operation and functioning of the facility. The updated OMP accompanies this PPR EA at **Appendix M**.

5.1.9 Staging

A staged consent is not sought as part of this Project Application. Staging of the project construction and delivery is intended to ensure that existing residents on the site may be accommodated throughout the construction process. Implications from this intended staged construction are discussed at **section 8** of this report.

5.1.10 Possible VPA involving Dedication of Public Land / Public Domain Improvements

Prior to lodgement of the Project Application with the Department of Planning in November 2010, the proponent had commenced preliminary discussions with Woollahra Council staff regarding the possibility of entering into a Voluntary Planning Agreement (VPA). Correspondence was forwarded to Council on 29 July 2010 outlining the proposed contents and terms of a VPA.

At its meeting of 11 October 2010, Council resolved to enter into negotiations with the Presbyterian Church regarding a possible VPA. The Council resolved as follows:

A. That Council support in principle negotiating a planning agreement with the Presbyterian Church (New South Wales) Property Trust for the dedication of land as outlined in the proposed planning agreement prepared by Urbis and dated 29/7/10. The Council does however reserve its position in relation to the proposed road widening and pavement widening in Stephen Street and the demonstrative benefit to the public in those works.

B. That, following discussions between staff and the Presbyterian Church (New South Wales) Property Trust in relation to the detailed terms of the proposed planning agreement, a further report be submitted to the appropriate committee.

C. That it be noted that Council's decision to support, in principle, a planning agreement with the Presbyterian Church (New South Wales) Property Trust does not fetter its right to make a submission and/or determination in relation to the merit of any planning application for the redevelopment of the Scottish Hospital site and that the Trust be advised accordingly.

For the sake of openness and clarity, the proposed VPA contents and terms were included at **Appendix N** to the Project Application EA report (November 2010) so that the Department of Planning could understand what potentially may result from any possible VPA discussions. Despite the VPA proposal, the Preferred Project as proposed does not rely on the execution of a VPA. The proposal has been designed to stand on its own. Any work undertaken as part of a VPA will be over and above that contemplated by the Preferred Project.

Further, in **section 8.14** of this report, a summary assessment is made against a scheme which includes those items identified for inclusion in a VPA by the proponent.

It is noted that in accordance with section 94F(3A) of the EP& Act, a planning agreement cannot exclude the application of section 94 or 94A of the Act in respect of development unless the consent authority for the development, or the Minister, is party to the agreement. As the proposed VPA may seek to offset any contributions to Council under s94 and s94A, this clause may be invoked. Once an in-principle Draft VPA has been agreed between Council staff and the Trust, the Department will be notified and the Minister approached so that due process may be followed in respect to section 94F(3A) of the Act.

Whilst negotiations have commenced between the Trust and Council staff in respect to a VPA, it is unlikely that a draft VPA will be resolved prior to the determination of this project application. It is also noted that the proposed contents of the VPA may change from those originally detailed subject to discussions with Council. Indeed, the updated VPA plan which is currently before Council for discussion is included at **Appendix N** to this PPR EA report. In this regard, the proponent requests that, should the project be approved by the Department, a condition be placed on such a consent requiring that the proponent either

- Pay relevant s94 or s94A contributions to Woollahra Council, or
- Enter into a VPA with Woollahra Council, or
- A combination of the above,

to the agreement of the parties.

6 Director General's Environmental Assessment Requirements

This report has been prepared having regard to the Director General's Environmental Assessment Requirements issued by the Department of Planning on 6 May 2010. The following table includes the DGRs and provides a cross referent to the section within this report where that requirement is addressed.

Table 3 – Director General's Environmental Assessment Requirements

Director General's Environmental Assessment Requirements		
Issue	**Director General's Requirement**	**Reference**
Relevant EPIs, policies and Guidelines to be addressed	NSW State Plan 2010	**EA section 7.2.1**
	Draft East Subregional Strategy	**EA section 7.2.2**
	Metropolitan Transport Plan 2010, Integrating Land Use and Transport – A Planning Policy Package 2001 and Planning Guidelines for Walking and Cycling 2004	**EA section 7.2.3, 7.2.4 and 7.2.5**
	Woollahra LEP 1995, Paddington Heritage Conservation Area DCP 2008, Off Street Car parking and Servicing Facilities DCP 2009, Access DCP 2004, Section 94 Contributions Plan 2002 (March 2005 Update), Section 94A Development Contributions Plan 2005, Draft DCP Stormwater Drainage Management 2006, Draft Flood Risk Management DCP 2004 and other relevant Development Control Plans	**EA section 7.3.10 and 7.3.11**
	Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005	**EA section 7.3.9**
	SEPP (Housing for Seniors and People with a Disability) 2004 and Seniors Living Policy: Urban Design Guideline for Infill Development 2004	**EA section 7.3.3**
	SEPP (Building Sustainability Index: BASIX) 2004	**EA section 7.3.5**
	SEPP 55 – Remediation of Land	**EA section 7.3.6**
	SEPP 65 – Design Quality of Residential Flat Development and the Residential Flat Design Code (RFDC)	**EA section 7.3.7**
	SEPP (Infrastructure) 2007	**EA section 7.3.8**

Director General's Environmental Assessment Requirements		
Issue	**Director General's Requirement**	**Reference**
	NSW Government Floodplain Development Manual 2005	**EA section 7.3.12**
	Nature and extent of any non-compliance with relevant environmental planning instruments, plans and guidelines and justification for any non-compliance.	**EA section 7 and section 8**
Built Form and Design Impacts	The EA shall address the height, bulk and scale of the proposed development within the context of the locality and the visual impact on heritage buildings and elements on and in the vicinity of the site and the Paddington Heritage Conservation Area. In particular, detailed envelope/height and contextual studies should be undertaken to ensure the proposal integrates with the local environment and heritage fabric.	**EA section 8.1**
	The EA shall provide the following documents: • Comparable height study to demonstrate how the proposed height relates to the height of the existing/approved developments surrounding the subject site • View analysis to and from the site from key vantage points • Options for the sting and layout of building envelopes.	**EA section 8.1.4, 8.1.7 and 8.1.1 Appendix F**
	The EA shall address the topographic characteristics of the site and height relationship of the proposed buildings with the existing and natural ground levels within the site and the surrounding land.	**EA section 8.1.2 and 8.1.4 Appendix F**
	The EA shall address the design quality of the development with specific consideration of the façades, massing, setbacks, building articulation, use of appropriate colours, materials/finishes, landscaping, and public domain, including an assessment against the CPTED Principles.	**Ea section 8.1.8 and 8.1.9**

Director General's Environmental Assessment Requirements		
Issue	**Director General's Requirement**	**Reference**
Heritage	A Heritage Impact Statement (HIS) and Conservation Management Plan (CMP) for the site shall be prepared in accordance with the requirements of the NSW Heritage Council guidelines and *Manual*.	**Appendix U and Appendix I**
Public Domain	The EA shall consider • The interface of the proposed development and public domain and provision of linkages with and between other public domain spaces including access rights and legibility • The relationship to and impact upon existing public domain • Any intention to dedicate to the Council and any land for public open space or any other purpose.	**EA section 8.3**
Environmental and Residential Amenity	The EA must address solar access, acoustic privacy, visual privacy and view loss and identify mitigation measures necessary to achieve a high level of environmental and residential amenity.	**EA section 8.4**
	The EA shall address the siting of the development in relation to existing significant landscaping on site including the heritage listed trees, and provide a site tree survey and arborist report.	**EA section 8.4.8** **Appendix F**
Transport and Accessibility (Construction and Operational)	The EA shall address the following matters: • Provide a Traffic and Accessibility Impact Study prepared in accordance with the RTA's Guide to Traffic Generating Developments, considering traffic generation including trip generation, any required road/intersection upgrades, access, loading dock(s), car parking arrangements, measures to promote public transport usage and pedestrian and bicycle linkages. • Provide an assessment of the implications of the proposed development for non-car travel modes (including public transport, walking and cycling) • Identify measures to mitigate potential impacts for pedestrians and cyclists during the construction stage of the project	**EA section 8.5**

Director General's Environmental Assessment Requirements		
Issue	**Director General's Requirement**	**Reference**
	• Demonstrate the provision of sufficient on-site car parking for the proposal having regard to local planning controls and RTA Guidelines and Australian Standards. (Note: the Department supports reduced car parking rates in areas well-serviced by public transport)	
Ecologically Sustainable Development (ESD)	The EA shall detail how the development will incorporate ESD principles in the design, construction and ongoing operation phases of the development.	**EA section 8.6** **Appendix X**
	The EA must demonstrate that the development has been assessed against a suitably accredited rating scheme to meet industry best practice.	**EA section 8.6** **Appendix X**
Threatened Species	The EA shall identify any potential impact on critical habitats, any wildlife corridors, threatened species, populations and endangered ecological communities and their habitat.	**EA section 8.7** **Appendix Y**
Drainage and Stormwater Management	The EA shall address drainage/groundwater/flooding issues associated with the development/site, including stormwater, drainage, infrastructure and incorporation of Water Sensitive Urban Design measures.	**EA section 8.8** **Appendix R**
Contamination and Geotechnical Issues	Contamination and geotechnical issues associated with the proposal should be identified and addressed in accordance with SEPP 55 and other relevant legislation and guidance. This assessment should also include an analysis of any risks/hazards associated with urban salinity and acid sulphate soils.	**EA section 7.3.6 and 8.9** **Appendix T and Z**
Utilities	In consultation with relevant agencies, address the existing capacity and requirements of the development for the provision of utilities including staging of infrastructure works.	**EA section 8.10.2010** **Appendix P**

Director General's Environmental Assessment Requirements		
Issue	**Director General's Requirement**	**Reference**
Staging	The EA shall provide a detailed staging plan demonstrating how existing services will continue to be provided during the redevelopment if required, and identifying relocation strategies for services and how existing operations will be affected by construction works.	**EA section 8.11**
Housing Choice	The EA shall provide an assessment of housing choice and shall identify the mix of 1, 2 and 3 or more bedroom units, and the level of choice of housing stock to be provided on site.	**EA section 8.12**
Resident Facilities	The EA is to provide details of any resident facilities, which would provide the opportunity for residents to socialise with other residents and visitors.	**EA section 8.13**
Contributions	The EA shall address the provision of public benefit, services and infrastructure having regard to Council's Section 94 and 94A Contribution Plans, and provide details of any Planning Agreement or other legally binding instrument proposed to facilitate this development.	**EA section 8.14**
Consultation	The EA shall demonstrate that an appropriate level of consultation in accordance with the Department's Major Project Community Consultation Guidelines October 2007 is to be undertaken and a comprehensive Community Consultation Strategy shall be provided.	**EA section 8.16**
Statement of Commitments	The EA must include a draft Statement of Commitments detailing measures for environmental management, mitigation measures and monitoring for the project.	**EA section 9**
PLANS AND DOCUMENTS TO ACCOMPANY THE APPLICATION		
General	The EA must include • An executive summary	**EA page vi**
	• A thorough site analysis including site plans, aerial photographs and a description of the existing and surrounding environment	**Appendix F**

Director General's Environmental Assessment Requirements		
Issue	**Director General's Requirement**	**Reference**
	• A thorough description of the proposed development	**Ea section 5**
	• An assessment of the key issues specified above and a table outlining how these key issues have been addressed	**EA section 8** **Table 3**
	• An assessment of the potential impacts of the project and a draft Statement of Commitments, outlining environmental management, mitigation and monitoring measures to be implements to minimise any potential impacts of the project	**EA section 8 and 9**
	• The plans and documents outlined below	**Various Appendices**
	• A signed statement from the author of the Environmental Assessment certifying that the information contained in the report is neither false nor misleading	**EA inside cover page**
	• A Quantity Surveyor's Certificate of Cost to verify the capital investment value of the project (in accordance with the definition contained in the Major Projects SEPP)	**Appendix O**
	• A conclusion justifying the project, taking into consideration the environmental impacts of the proposal, the suitability of the site, and whether or not the project is in the public interest.	**EA section 10**
Plans and Documents	The following plans, architectural drawings, diagrams and relevant documentation shall be submitted. 1. An existing site survey plan drawn at an appropriate scale illustrating • The location of the land, boundary measurements, area (sqm) and north point • The existing levels of the land in relation to buildings and roads • Location and height of existing trees • Location and height of adjacent buildings and private open space • All levels to be to Australian Height Datum	**Appendix E**

Director General's Environmental Assessment Requirements		
Issue	**Director General's Requirement**	**Reference**
	2. A site analysis plan must be provided which identified existing natural elements of the site (including all hazards and constraints), existing vegetation, footpath crossing levels and alignments, existing pedestrian and vehicular access points and other facilities, slope and topography, utility services, boundaries, orientation, view corridors and all structures on neighbouring properties where relevant to the application (including windows, driveways, private open space etc). Adjoining land uses and activities, sources of nuisances and heritage features of the surrounding locality and landscape shall also be shown.	**Appendix F**
	3. A locality/context plan drawn at an appropriate scale should be submitted indicating: • Significant local features such as parks, community facilities and open space and heritage items. • The location and uses of existing buildings, shopping and employment areas. • Traffic and road patterns, pedestrian routes and public transport nodes.	**Appendix F**
	4. Architectural drawings at an appropriate scale illustrating: • The location of any existing building envelopes or structures on the land in relation to the boundaries of the land and any development on adjoining land. • Detailed floor plans, sections and elevations of the proposed buildings. • Elevation plans providing details of external building materials and colours proposed. • Fenestrations, balconies and other features. • Accessibility requirements of the Building Code of Australia and the Disability Discrimination Act. • The height (AHD) of the proposed development in relation to the land. • The level of the lowest floor, the level of any unbuilt area and the level of the ground.	**Appendix B**

Director General's Environmental Assessment Requirements		
Issue	**Director General's Requirement**	**Reference**
	• Any changes that will be made to the level of the land by excavation, filling or otherwise.	
	5. A schedule of Materials and Finishes and Sample Board, detailing all proposed materials and finishes.	**Appendix B**
	6. Visual and View Analysis demonstrated through visual aids, such as a photomontage, to demonstrate visual impacts of the proposed building envelopes. In particular the view analysis must consider siting, bulk and scale relationships from key areas.	**Appendix W**
	7. A Physical Model of the proposed development for the entire site.	**Accompanying the EA**
	8. Shadow diagrams showing solar access to the site and adjacent properties at summer solstice (Dec 21), winter solstice (June 21) and the equinox (March 21 and September 21) at 9am, 12 midday and 3pm.	**Appendix B**
	9. Heritage Impact Statement and Conservation Management Plan prepared in accordance with the NSW Heritage Council guidelines and Manual and illustrating the impact of the proposed development on the heritage listed buildings and trees on and in the vicinity of the site, and Paddington Conservation Area.	**Appendix U and I**
	10. An Arborist Report which makes an assessment of the impact of the proposed development on all of the trees on site.	**Appendix G**
	11. Landscape Plan illustrating treatment of open space areas on the site, screen planting, retaining walls and fencing along common boundaries and tree protection measures both on and off the site. Details of any trees to be removed, existing and proposed planting (for proposed planting documentation on the type of species and growth at full maturity is needed).	**Appendix J**

Director General's Environmental Assessment Requirements		
Issue	**Director General's Requirement**	**Reference**
	12. Desktop Assessment identifying any threatened species on site and an assessment of the impact of the proposed development on any threatened species (if any). Note: There a desktop assessment identifies a potential impact, the proponent may be required to undertake a detailed investigation in consultation with the Department of Environment and Climate Change. Please attach all relevant documentation.	**Appendix Y**
	13. Preliminary Site Contamination Assessment and documentation that demonstrates that the land can be made suitable for the intended purpose within the project delivery timeframe.	**Appendix T**
	14. Stormwater Concept Plan – illustrating the concept for stormwater management.	**Appendix R**
	15. Erosion and Sediment Control Plan – plan or drawing that shows the nature and location of all erosion and sedimentation control measures to be utilised on the site.	**Appendix R**
	16. Other Plans (to be required where relevant) • Geotechnical Report – prepared by a recognised professional who assesses the risk of Geotechnical failure on the site and identifies design solutions and works to be carried out to ensure the stability of the land and structures and safety of persons. • Groundwater Assessment – identifying groundwater issues and potential degradation to the groundwater source that may be encountered during excavation. The assessment should identify contingency measures to manage any potential impacts.	**Appendix AA**

7 Policy Assessment

7.1 Summary of Policy Assessment

This section provides an assessment of the proposal against the relevant EPIs and policies required by the DGRs.

In summary, the proposal is considered to meet the relevant requirements and objectives of the policies and EPIs.

7.2 Consistency with Strategic Planning Policy

7.2.1 NSW State Plan 2010

The NSW State Plan was updated by the NSW State Government in 2010 and outlines the State's long term plan for delivery of services across NSW. It covers eight key priority areas including:

- *Better Transport and Liveable Cities*
- *Supporting Business and Jobs*
- *Clever state*
- *Healthy communities*
- *Green State*
- *Stronger communities*
- *Keeping people safe*
- *Better Government*

The State Plan does not specifically set any targets relating to the ageing of the population or increased provision of seniors housing. It does, however, refer to the strategy "*Towards 2030 – Planning for Our Changing Population*" which was released in April 2008. *Strategic Priority 1.3: Liveable Homes and Communities* within that plan aims to increase the quality and range of housing provided for seniors within the community. One of its priorities is as follows.

> *Ensure that housing planning incorporates the following features:*
>
> - *encouraging universal design principles as the basis for planning for seniors housing in the public and private sectors;*
> - *a range of housing choices to meet the needs of a changing population profile;*
> - *safe and accessible, well designed communities suitable for a diverse ageing population; and*
> - *partnership models where social housing is provided in conjunction with support services for older people.*

It is considered that the subject proposal will significantly assist in the provision of appropriate and diverse aged care services within the Eastern Suburbs of Sydney, an area which is currently underserviced in this regard. The proposal has been designed having regard to current accessibility standards, and will provide a safe living environment for all residents. The facility will be owned and run by the Presbyterian Church through PAC, who will provide a number of support services for residents as detailed in this report.

7.2.2 Draft East Subregional Strategy

The Draft East Subregional Strategy sets a framework for the delivery of various actions within the local government areas of Botany, Randwick, Waverley and Woollahra. The Draft Strategy details actions covering a range of themes, including

- *Economy and employment*
- *Centres and corridors*
- *Housing*
- *Transport*
- *Environment, heritage and resources*
- *Parks, public places and culture, and*
- *Implementation and governance.*

Of these chapters, 'Housing' and 'Centres and Corridors' are most relevant to the subject proposal.

Housing

The Draft Strategy identifies the need to accommodate changing demands for housing generated by an ageing population.

> *"Over the next 25 years significant ageing of the resident population within the East Subregion is forecast. Currently 13.5 per cent of the population is aged over 65 years. This figure will grow to 18 per cent by 2031, highlighting the importance of providing more aged care facilities within the subregion. As the population ages, it is likely that the average number of people per household will continue to decline, thus increasing the demand for housing."*

> *"The ageing population within Sydney and in particular in the East makes the provision for housing for both older people and people with a disability very important."*

Along with catering for an ageing population, Woollahra has been given a target of providing an additional 2,900 new dwellings by 2031

Centres and Corridors

In addition to providing greater housing choice to cater to the changing demands of the population, there is also a focus on locating such housing close to existing transport, retail and community services.

> *"Increasing residential densities within the walking radius of smaller local centres can make these places more vibrant and provide much needed housing choice for the ageing and changing population. In planning for these local centres councils will need to consider their employment role. Housing growth will need to be planned so it does not undermine the identified employment needs."*

It is considered that the subject proposal at the Scottish Hospital site addresses these two actions within the Draft Subregional Strategy. High quality aged care, where ageing in place is provided for on site, in close proximity to services and transport is proposed on the subject site. The proposed development has been specifically designed to cater for the identified increase in need for appropriate seniors housing within the Eastern Suburbs of Sydney. A range of housing types (1, 2nad 3 bedroom apartments) and care levels (high and low care) are proposed to be provided to ensure that the needs of seniors from all income levels can be met, in an area which keeps residents connected within their established community and family networks.

Furthermore, the increase in employment on the site of up to 30 jobs (increasing from 70 existing jobs to up to 100 proposed jobs) will significantly assist in Council meeting its employment target of 300 jobs by 2031.

7.2.3 Metropolitan Transport Plan 2010

The *Metropolitan Transport Plan—Connecting the City of Cities* sets a vision for how the city will be in the future. It is the State Government's strategy to effectively link Sydney's land use planning with its transport network. The Metropolitan Transport Plan sits within the Sydney Metropolitan Strategy, and identifies actions to facilitate the delivery of integrated land use and transport initiatives across Sydney to help support growth in the metropolitan region.

The Metropolitan Transport Plan does not identify any specific targets that directly relate to the proposed development; however encourages accessible transport for the broad community of Sydney, including seniors. The proposed development is located on a site that is within close proximity to established public transport routes, and is a short bus ride from Sydney CBD and Bondi Junction, two major centres.

7.2.4 Integrating Land Use and Transport – A Planning Policy Package 2001

This planning policy package encompasses three separate policies being:

- 'The Right Place for Business and Services'
- 'Improving Transport Choice'
- 'Summary of Employment and Journey to Work Problems in the Greater Metropolitan Region'

'The Right Place for Business and Services' provides directions for:

- *locating trip-generating activities near one another*
- *supporting a network of mixed use centres to accommodate these activities.*

Businesses and services which generate transport demand should be in the 'right place' — that is, locations which offer a choice of transport and increase opportunities for multi-purpose trips. The siting of trip-generating development in dispersed locations carries significant community and environmental costs.

The objectives of this policy are to:

- *locate trip-generating development which provides important services in places that:*
  - *help reduce reliance on cars and moderate the demand for car travel*
  - *encourage multi-purpose trips*
  - *encourage people to travel on public transport, walk or cycle*
  - *provide people with equitable and efficient access*
- *minimise dispersed trip-generating development that can only be accessed by cars*
- *ensure that a network of viable, mixed use centres closely aligned with the public transport system accommodates and creates opportunities for business growth and service delivery*
- *protect and maximise community investment in centres, and in transport infrastructure and facilities*
- *encourage continuing private and public investment in centres, and ensure that they are well designed, managed and maintained*
- *foster growth, competition, innovation and investment confidence in centres, especially in the retail and entertainment sectors, through consistent and responsive decision making.*

This policy is generally aimed at the following types of development:

- *retailing, which refers to all places where goods are traded to the public including markets, bulky goods warehouses, 'big box' superstores and factory outlets*

- *leisure and entertainment facilities*
- *offices (other than those offices ancillary to industrial or non-retail commercial land uses)*
- *health and education facilities*
- *community and personal services.*

Whilst the proposed development does not strictly fall into any of these categories, it is sited in close proximity to transport links which will be utilised by both staff and residents of the site. The proposal has been sited and designed with the requirements of *SEPP (Housing for Seniors and People with Disabilities)* in mind, thereby ensuring proximity to transport, and accessible paths to and within the site.

'Improving Transport Choice' provides guidelines for integrating land use and transport. The guidelines will assist councils in converting metropolitan planning and transport objectives into outcomes at a local level in relation to precincts or individual developments.

The guidelines also advise local councils, the development industry, state agencies, other transport providers and the community how they can:

- *locate land uses and design development to encourage the use of more sustainable transport such as public transport, walking and cycling*
- *help provide transport choice and manage travel demand to improve the environment, accessibility and liveability.*

This policy contains 10 principle guidelines for improving transport choice. These include.

Principle 1 – Concentrate in Centres

Principle 2 – Mix Uses in Centres

Principle 3 – Align Centres with Corridors

Principle 4 – Link Public Transport with land use strategies

Principle 5 – Connect Streets

Principle 6 – Improve Pedestrian Access

Principle 7 – Improve Cycle Access

Principle 8 – Manage Parking Supply

Principle 9 – Improve Road Management

Principle 10 – Implement Good Urban Design

Those principles relevant to the proposal are addressed below.

Principle 1 – Concentrate in Centres

- *Develop concentrated centres containing the highest appropriate densities of housing, employment, services and public facilities within an acceptable walking distance — 400 to 1000 metres — of major public transport nodes, such as railway stations and high frequency bus routes with at least a 15 minute frequency at peak times.*

The subject site is located within 400m distance, via an accessible path of travel, to the 389 bus route linking the City and Bondi Junction. This service runs frequently on both weekdays and weekends. The site is appropriately located to accommodate the proposed population.

Principle 7 – Improve Cycle Access

- *Maximise cyclists' accessibility to centres, services, facilities and employment locations.*

Provision is made on the site for 4 bicycle parking spaces, for use by residents, visitors and staff who may wish to utilise this form of transport.

Principle 8 – Manage Parking Supply

- *Use the location, supply and availability of parking to discourage car use.*

On-site car parking is provided for residents and visitors in accordance with the requirements of *SEPP (Housing for Seniors and People with a Disability)*. In addition, car parking is provided on site for employees. Given the nature of the shift work undertaken by the majority of staff employed in the Residential Aged Care Facility, the majority of workers will drive to the site. In response to concerns raised by the surrounding residents, it is proposed to accommodate a sufficient number of staff car parking spaces on site to ensure minimal reliance is had on on-street car parking surrounding the site.

Principle 10 – Implement Good Urban Design

- *Design with an emphasis on the needs of pedestrians, cyclists and public transport users.*

The proposed development caters primarily to the needs of seniors and frail aged residents, however also provides good access for visitors and employees to various transport options. Buildings are oriented to address the street frontages as far as possible, to maximise public surveillance over the pedestrian footpaths.

Health and Education Uses

This policy also provides guidelines for differing land uses. Special uses, such as housing for older people, schools, colleges, hospitals and community centres, are used by a high proportion of public transport dependent people, some of whom have restricted mobility or disabilities.

The following guidelines apply to Health and Education uses.

- *Safe, level and direct pedestrian paths to nearby bus stops, shops and other facilities should link these services*

Such access paths are to be provided, improving the linkage of the site to the 389 bus service on MacDonald Street.

- *In the siting and design of schools and hospitals, it is important to balance the need for close proximity to public transport routes with the need to avoid disturbance from noise or vibration and to optimise road safety. This requires careful consideration of the street and road network*

N/A not a school or hospital.

- *Sufficient off-street space should be provided for the movement of all transport modes — cars, taxis, bicycles, pedestrians, service and emergency vehicles and buses. Safe pick up/set down areas away from major roads should be provided for new facilities*

Adequate facilities are provided on site to cater for the varied transport modes likely to be used by residents, visitors and employees. Basement and at-grade car parking is provided for vehicles, whilst provision is also made for the secure storage of bicycles. The central drop-off/pick-up zone provides a safe and accessible location for taxi services to and from the site, as well as for ambulances and other emergency vehicles. Pedestrian access to the site is provided via Cooper Street, corner of Cooper and Brown Street, and at the site's main entryway off Brown Street. A pedestrian link for residents is also provided from the Brown Street ILU building forming part of the accessible path of travel to the nearby bus service.

- *Where good public transport services are available, consideration should be given to constraining parking provision for staff. However, the parking needs of night workers should be taken into account*

Car parking is provided in accordance with the requirements of SEPP (HSPD) which provides for staff and resident car parking.

- *School buses should have an exclusive loading/unloading zone, separate from all other vehicles. There should be adequate manoeuvring space, and pick up and drop off should be on the same side of the road as the school*

N/A

- *Safe 'kiss and ride' space should be provided at schools, so that bus stops, pedestrian crossings and unsafe driveways are not used*

N/A

- *Footpaths should be provided and maintained along nearby streets and within the educational or health facility site*

Footpaths are provided around the site and within the site, that meet relevant accessibility standards.

- *Good bicycle storage facilities should be provided, or shared with other uses.*

Secure bicycle storage is provided on site for use by residents, visitors and staff who may wish to utilise this form of transport.

7.2.5 Planning Guidelines for Walking and Cycling 2004

The NSW Government Planning Guidelines for Walking and Cycling aim to assist land-use planners and related professionals to improve consideration of walking and cycling in their work. It is anticipated that this will ultimately create more opportunities for people to live in places with easy walking and cycling access to urban services and public transport.

For the most part these guidelines are aimed at the strategic and plan-making levels, when road layouts and linkages are designed and implemented.

This document suggests that cycle parking should be provided to account for 3-5% of staff, resident and visitor trips to "aged or disabled self care housing".

It is proposed that 4 bicycle spaces will be provided on site for use by staff, visitors and residents.

7.3 Consistency with Statutory Planning Policy

7.3.1 Environmental Planning and Assessment Act

Clause 5 of the Environmental Planning and Assessment Act contains the objects of the Act. Development within NSW should be consistent with these objects.

The objects of the Environmental Planning and Assessment Act, 1979, 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.

Comment

The proposed development is considered to be consistent with the Objects of the EP&A Act.

- The significant natural characteristics of the subject site will be retained and proposed building works and use of the site will be complementary to the vegetated nature of the site.
- The site is currently underutilised, with many redundant and derelict buildings. The proposal seeks to adaptively re-use the heritage elements on the site whilst improving the range of seniors living options on the site for use by the community.
- The availability of utility services have been considered in the subject application. There is sufficient capacity in the existing systems to cater to demand likely to be generated by the proposed use.
- The public open space to the north of the site will be protected, along with the other public domain surrounding the site. The proponent has presented an option to Woollahra Council whereby land dedication may be undertaken to enlarge Dillon Street reserve, subject to entering into a Voluntary Planning Agreement.
- The proposal seeks consent to construct much needed seniors housing within the eastern suburbs of Sydney. This will assist in the provision of community services through improving seniors housing choice and availability in the locality, and associated support initiatives.
- The proposed development will not significantly impact upon the habitat of threatened species.
- Ecologically sustainable development initiatives have been incorporated into the proposed scheme.
- PAC has undertaken extensive market research and proposes to provide a residential product that will cater to the needs of a wider range of seniors within the local community. This includes the provision of a range of housing types at varying price points. 45% of the RACF places are proposed to be 'concessional' places.
- Early consultation has been undertaken with staff of Woollahra Council, involving them in the early design phase of the project.
- Early consultation has been undertaken with members of the local community and other stakeholder groups, providing initial input into the layout of building forms on the site. Formal public notification of the project application will provide further opportunities for public comment on the proposal.

7.3.2 SEPP (Major Development) 2005

State Environmental Planning Policy (Major Development) 2005 outlines thresholds for certain types of development that, if met, require assessment by the NSW Department of Planning.

The subject development has been declared a Major Project under Clause 6 of this SEPP, as its estimated Capital Investment Value (CIV) at the time of declaration fell above the non-discretionary threshold of $100 million for 'Group 5 – Residential, Commercial or Retail Projects' under Schedule 1 of the SEPP.

On 9 March 2010, the Deputy Director-General, under delegation from the Minister for Planning, issued confirmation under clause 6 of the SEPP that the subject proposal was a Major Development and is to be assessed under Part 3A of the Environmental Planning and Assessment Act.

Director General's Environmental Assessment Requirements were issued by the Director of Metropolitan Projects on 6th May 2010, in response to the Preliminary Environmental Assessment of the project.

This Environmental Assessment has been prepared in response to the Director General's Requirements, issued under s75F of the Act.

A Quantity Surveyor's Certificate of Cost is attached at **Appendix O** to the Project Application EA report (November 2010), detailing the CIV of the proposal. It is noted that since declaration of this project as a Major Project, the definition of Capital Investment Value has been altered.

For the sake of clarity a calculation has been provided detailing the current cost of the project based on the methodology used for CIV in February 2010 to inform the clause 6 declaration, and also in accordance with the revised CIV definition which came into force on 7 May 2010.

7.3.3 SEPP (Housing for Seniors and People with a Disability) 2004

State Environmental Planning Policy (Housing for Seniors and People with a Disability) 2004, herein referred to as SEPP Seniors, is the principle planning instrument governing aged care housing in NSW.

In accordance with Clause 4 of SEPP Seniors, this policy applies to land within New South Wales that is land zoned primarily for urban purposes or land that adjoins land zoned primarily for urban purposes, but only if:

(a) development for the purpose of any of the following is permitted on the land:

- *a. dwelling-houses,*
- *b. residential flat buildings,*
- *c. hospitals,*
- *d. development of a kind identified in respect of land zoned as special uses, including (but not limited to) churches, convents, educational establishments, schools and seminaries, or*

(b) the land is being used for the purposes of an existing registered club.

The subject site is zoned 5 Special Uses (Hospital), and as such, this SEPP applies to the land.

As per the definitions contained within Chapter 2 of SEPP Seniors, the proposal constitutes development for

- Residential Aged Care facility, being

residential accommodation for seniors or people with a disability that includes:

(a) meals and cleaning services, and

(b) personal care or nursing care, or both, and

(c) appropriate staffing, furniture, furnishings and equipment for the provision of that accommodation and care,

not being a dwelling, hostel, hospital or psychiatric facility.

- Self-Contained Dwellings, being

a dwelling or part of a building (other than a hostel), whether attached to another dwelling or not, housing seniors or people with a disability, where private facilities for significant cooking, sleeping and washing are included in the dwelling or part of the building, but where clothes washing facilities or other facilities for use in connection with the dwelling or part of the building may be provided on a shared basis.

Clauses 15 and 16 of SEPP Seniors

These clauses enable the following development to be undertaken with the consent of the relevant consent authority, despite the provisions of any other environmental planning instrument, if the development is carried out in accordance with SEPP Seniors.

(a) development on land zoned primarily for urban purposes for the purpose of any form of seniors housing, and

(b) development on land that adjoins land zoned primarily for urban purposes for the purpose of any form of seniors housing consisting of a hostel, a residential care facility or serviced self-care housing.

The subject land is zoned for urban purposes. Any form of seniors housing is thereby permissible on this land in accordance with these clauses.

Clause 26 Location and Access to Facilities

Clause 26 of the SEPP requires that residents of any development proposed under SEPP Seniors must have access to a range of services and facilities either

- within 400m walking distance of the site (by a suitable access pathway), or
- via a public transport service that is located within 400m walking distance of the site which transports residents to within 400m walking distance of such services. Each of the 400m walking distances must be via a suitable access pathway.

In accordance with the SEPP, a suitable access pathway

(a) is a path of travel by means of a sealed footpath or other similar and safe means that is suitable for access by means of an electric wheelchair, motorised cart or the like, and

(b) distances that are specified for the purposes of that subclause are to be measured by reference to the length of any such pathway.

An accessibility assessment for the site has been undertaken by Mark Relf Accessibility Consulting, in response to this requirement. This accessibility report is attached at **Appendix K** of the Project Application EA Report – November 2010.

The site is located within 400m walking distance of the Sydney Buses 398 service, which provides services between Sydney City and North Bondi via Bondi Junction at regular intervals 7 days a week. Subject to the following improvements to the public footpath linking the site and the bus stop, an accessible path of travel will be achieved:

- Upgrade of a speed hump on Brown Street to a raised pedestrian crossing point to access Glenview Street.
- Installation of kerb ramps at the intersection of Glenview Street and Brown Lane.

- Installation of kerb ramps at the intersection of Liverpool Street and MacDonald Lane.
- Footpath upgrade new no. 16-18 Glenview Street to eliminate trip hazards.

The proponent is willing to undertake these minor upgrades and such requirements are included in the accompanying Draft Statement of Commitments.

Clause 28 Water and Sewer

Clause 28 requires that the proposed seniors housing will be connected to a reticulated water system and have adequate facilities for the removal or disposal of sewage.

The subject site is currently serviced by water and sewer. The Utilities services report prepared by Cardno ITC which accompanied the Project Application EA Report (November 2010) at **Appendix P** certifies that there is adequate water and sewer capacity to service the site upon completion.

Clause 29 Consideration of Site Compatibility Criteria where clause 24 does not apply

This clause requires that certain 'site compatibility criteria' (as specified in clause 25 (5) (b) (i), (iii) and (v)) be considered even where a Site Compatibility Certificate is not required under clause 24 of the SEPP.

These are addressed below.

> *(i) the natural environment (including known significant environmental values, resources or hazards) and the existing use and approved uses of land in the vicinity of the proposed development.*

The subject proposal has been informed by the recommendations of various specialist consultant reports in the areas of arboriculture, geotechnical and site contamination, flora and fauna and flooding. Each of these reports is appended to this EA, which conclude that no impact will be had on the natural features of the site, and recommending some mitigation measures to ameliorate any potential future impact. Such recommendations are included in the Draft Statement of Commitments at **section 9** of this EA report.

The subject site is currently occupied and used for aged care services. The surrounding area is residential in nature. These uses are considered to be complementary to each other, and the proposal is considered to be compatible to the character of the predominant residential land use in the vicinity of the site.

> *(iii) the services and infrastructure that are or will be available to meet the demands arising from the proposed development (particularly retail, community, medical and transport services having regard to the location and access requirements set out in cl.26) and any proposed financial arrangements for infrastructure provision.*

A thorough analysis of the requirements of clause 26 of the SEPP has been undertaken and is detailed above. It is considered that the site is well located in terms of access to services for residents. Minor upgrades to footpaths are recommended to ensure realisation of an accessible path of travel linking the site with public transport services.

> *(v) without limiting any other criteria, the impact that bulk scale, built form and character of the proposed development is likely to have on the existing uses, approved uses and future uses of land in the vicinity of the proposed development.*

Section 8 of this report provides an analysis of the bulk, scale, built form and character of the proposal in the context of the site's surrounding locality. It is acknowledged that by virtue of site characteristics and the particular requirements of seniors living and aged care facilities that the terrace-house typology predominant in Paddington is not viable for this site, however it is considered that the proposed building forms are appropriate for their designated use whilst having been designed to minimise impacts on the surrounding area.

Clause 30 Site Analysis

Clause 30 requires that a site analysis be undertaken of the site and its surroundings to inform the design and location of built form. A thorough site and context analysis has been undertaken by GMU Urban Design and Architecture, and accompanies this EA report at **Appendix F**.

The analysis has informed the siting of buildings having regard to the opportunities and constraints identified as a result of the analysis.

Clause 31 Design of In Fill Self Care Housing

In determining a project application made pursuant to this Chapter to carry out development for the purpose of in-fill self-care housing, a consent authority must take into consideration (in addition to any other matters that are required to be, or may be, taken into consideration) the provisions of the *Seniors Living Policy: Urban Design Guideline for Infill Development* published by the Department of Infrastructure, Planning and Natural Resources in March 2004.

This policy is addressed in **section 7.3.4** below

Clause 32 Design of Residential Development

A consent authority must not consent to a project application made pursuant to this Chapter unless the consent authority is satisfied that the proposed development demonstrates that adequate regard has been given to the principles set out in Division 2 (see clause 33-39 below).

Clause 33 Neighbourhood Amenity and Streetscape

The proposed development should:

(a) recognise the desirable elements of the location's current character (or, in the case of precincts undergoing a transition, where described in local planning controls, the desired future character) so that new buildings contribute to the quality and identity of the area, and

(b) retain, complement and sensitively harmonise with any heritage conservation areas in the vicinity and any relevant heritage items that are identified in a local environmental plan, and

(c) maintain reasonable neighbourhood amenity and appropriate residential character by:

(i) providing building setbacks to reduce bulk and overshadowing, and

(ii) using building form and siting that relates to the site's land form, and

(iii) adopting building heights at the street frontage that are compatible in scale with adjacent development, and

(iv) considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours, and

(d) be designed so that the front building of the development is set back in sympathy with, but not necessarily the same as, the existing building line, and

(e) embody planting that is in sympathy with, but not necessarily the same as, other planting in the streetscape, and

(f) retain, wherever reasonable, major existing trees, and

(g) be designed so that no building is constructed in a riparian zone.

The design of the proposal has been informed by a thorough site and context analysis which identifies a high quality design approach for the site redevelopment.

The proposal is considered to be complementary to the site's surroundings through the location and massing of building forms. Significant vegetation is retained on the site, and the proposal responds appropriately to the heritage significance of the site and locality.

A thorough analysis of the design response to its neighbourhood context is undertaken in **section 8** of this report.

Clause 34 Visual and Acoustic Privacy

The proposed development should consider the visual and acoustic privacy of neighbours in the vicinity and residents by:

(a) appropriate site planning, the location and design of windows and balconies, the use of screening devices and landscaping, and

(b) ensuring acceptable noise levels in bedrooms of new dwellings by locating them away from driveways, parking areas and paths.

The site is located effectively on its own 'block' with no immediate neighbours. As detailed in **section 8** of this report, the proposed buildings have been designed and oriented to minimise visual and acoustic impacts on neighbouring properties across Brown, Cooper and Stephen Streets.

Louvred privacy screens are proposed along the Stephen Street elevation of the RACF building, limiting opportunities for overlooking from the west facing bedrooms into properties on the western side of Stephen Street. These details are shown on plan ref DA520 at **Appendix B** to this PPR report. The view line analysis demonstrates that views from RACF bedrooms will be restricted to an angle such that no overlooking will occur into residences across Stephen Street.

The air conditioning condenser units have been lowered further into the ground to RL 16.5 (effectively 2m below street level) and are now proposed to be screened via a louvred enclosure to minimise visual and acoustic impact to Stephen Street. All plant and equipment will be installed to comply with acoustic criteria set out in relevant Australian Standards. These details are also shown on plan ref DA520 at **Appendix B**.

Clause 35 Solar Access and Design for Climate

The proposed development should:

(a) ensure adequate daylight to the main living areas of neighbours in the vicinity and residents and adequate sunlight to substantial areas of private open space, and

(b) involve site planning, dwelling design and landscaping that reduces energy use and makes the best practicable use of natural ventilation solar heating and lighting by locating the windows of living and dining areas in a northerly direction.

The buildings and individual dwellings have been designed and oriented to maximise solar access and cross ventilation. As addressed under SEPP 65, an updated solar access analysis prepared by Steve King (**Appendix Q** to the Project Application EA report – November 2010) confirms that 73% of dwellings achieve an effective 3 hours solar access to living areas and private open space at midwinter.

The buildings have been designed to maximise cross ventilation and reduce reliance on mechanical cooling in summer. Where possible, dwellings have been oriented towards a northerly aspect.

Clause 36 Stormwater

The proposed development should:

(a) control and minimise the disturbance and impacts of stormwater runoff on adjoining properties and receiving waters by, for example, finishing driveway surfaces with semi-pervious material, minimising the width of paths and minimising paved areas, and

(b) include, where practical, on-site stormwater detention or re-use for second quality water uses.

The Hydrology report prepared by Cardno ITC which accompanies the Project Application EA Report (November 2010) at **Appendix R** identifies how the project will manage stormwater runoff and ensure retention of water quality. On site detention is proposed to be located adjacent to the site's Brown Street entrance. This is further detailed in **section 8** of this report.

Clause 37 Crime Prevention

The proposed development should provide personal property security for residents and visitors and encourage crime prevention by:

(a) site planning that allows observation of the approaches to a dwelling entry from inside each dwelling and general observation of public areas, driveways and streets from a dwelling that adjoins any such area, driveway or street, and

(b) where shared entries are required, providing shared entries that serve a small number of dwellings and that are able to be locked, and

(c) providing dwellings designed to allow residents to see who approaches their dwellings without the need to open the front door.

Casual surveillance over the internal driveway system will be available from the Brown and Stephen Street ILU buildings. Dwellings within the site also provide casual surveillance over the public domain areas of Brown, Stephen and Cooper Street, and are oriented towards the Dillon Street reserve (but set back from this boundary) to give a sense of casual surveillance without immediate overlooking of this open space area.

A shared entry and circulation system is provided to each of the Brown Street, Stephen Street and Cooper Street ILU buildings, along with another entry to the Stephen Street RACF building. Each entry will be secured, requiring a security tag or authorisation for entry to be provided by staff or residents. A linked circulation system is required to ensure accessible path of travel throughout the site linking the vehicular entry and car park, to the uppermost section of the site on the corner of Brown and Cooper Streets. The site itself is secure; ensuring that public access to the residential buildings is not available without passing a secure entry point.

Design of the individual dwellings includes peep holes at the front door to allow residents to see people outside the front door without opening it. Security measures will ensure that residents will be required to authorise access to site visitors.

Further assessment against CPTED principles is provided in **section 8** of this report.

Clause 38 Accessibility

The proposed development should:

(a) have obvious and safe pedestrian links from the site that provide access to public transport services or local facilities, and

(b) provide attractive, yet safe, environments for pedestrians and motorists with convenient access and parking for residents and visitors.

The site is located within 400m walking distance via Glenview Street and Liverpool Street to a bus stop on McDonald Street which is serviced by the Sydney Buses 389 route. Improvements along this pathway are required to ensure it meets the requirements of a 'suitable access pathway'. The proponent has committed to undertaking these improvements.

Within the site, the layout has been designed to ensure an accessible path of travel from the site entry throughout all buildings, to the uppermost point of the site at the corner of Cooper and Brown Streets. Accessible paths have been designed into the landscape plan ensuring that residents and visitors can take full advantage of the site and its facilities.

Refer also to discussion within the Access report at **Appendix K** to the Project Application EA Report (November 2010), which concludes that

- *The development is appropriately located being 290 metres to public bus transport route 389 and will provide accessible pedestrian footpath access from the site along Glenview Street, Liverpool Street and MacDonald Street, subject to several minor infrastructure upgrades, to comply with clauses 26(2)(b), 26(3), 26(4), 26(5) and 38(a); and*

- *Bus route 389 which travels to several large regional shopping centres provides at least 40 trips a day Monday to Friday during daylight hours in accordance with clauses 26(1), 26(2)(b), 26(3), 26(4); and*
- *A review of Bondi, Bondi Junction, Woollahra, City shopping centres and surrounds illustrates an appropriate range of retail, commercial and recreational services that includes banking, medical centres, supermarket, numerous variety stores/services and recreational facilities to comply with clauses 26(1) and 26(5) suitable for this type of development.*
- *The development demonstrates compliance with the minimum requirements of visitability by virtue of 100% of the 82 self contained dwellings that will have wheelchair accessible pathways from an adjoining road or internal road as required by schedule 3 clause 2(1) and the accessibility requirements of the Seniors Living Urban Design Guideline as referenced by Clause 31; and*
- *Accessibility of the 82 self-contained dwellings (100%) and compliance with the design standards of schedule 3; and*
- *Accessibility of the 100 bed residential aged care facility and compliance with the accessibility requirements of Parts D3, E3., F2.4 of the BCA to satisfy division 2 of the Housing for Seniors Policy; and*
- *Provision of communal amenities that will be wheelchair accessible and benefit the lifestyle of future residents also demonstrate compliance with AS 1428 and clauses 38(b), schedule 3 clause 2(3); and*
- *Provision of well designed parking for residents and visitors in accordance with schedule 3 clause 5, clause 50(h) and 38(b).*

Clause 39 Waste Management

The proposed development should be provided with waste facilities that maximise recycling by the provision of appropriate facilities.

Garbage rooms are provided in the upper basement level for the storage of garbage and recyclables prior to collection. These will be transferred to the collection storage area at the Brown Street site entrance for collection as required. All waste will be collected by a private contractor in accordance with the operational management plan.

Clause 40 Development Standards – Minimum Sizes and Building Height

Table 4 – SEPP Seniors Clause 40 Assessment Table

Development Standard	Required	Proposed	Complies
Site size (cl.40(2))	At least 1,000m2	14,780m2	Yes
Site frontage (cl.40(3))	At least 20m	129m to Brown Street 121m to Cooper Street 144m to Stephen Street 90m to Dillon Reserve	Yes
Height (cl. 40(4))	N/A applies to residential zones only		
in residential zones where residential flat buildings are not permitted (cl.40(4)(a))	8m or less in residential zones (ground to ceiling level)	N/A	N/A Only applies in residential zones Merit assessment of height required. No maximum height limit under SEPP HSPD.
buildings adjacent to site boundary (cl.40(4)(b))	2 storeys	N/A	N/A. Only applies in residential zones.
buildings located in the rear 25% of site (cl.40(4)(c))	Building located in rear 25% area of site not to exceed 1 storey	N/A	N/A. Only applies in residential zones.

41 Standards for hostels and self-contained dwellings

The Accessibility Report at **Appendix K** to the Project Application EA Report (November 2010) provides an assessment against the Schedule 3 items for hostels and self-contained dwellings.

The assessment shows that all the relevant standards are, or will be able to be, met by the proposal.

As some internal details including fixtures and fittings will be finalised during detailed design stage, the proponent includes in the Draft Statement of Commitments a requirement to construct all internal details in accordance with the requirements of schedule 3 and AS 4299.

Clause 48 Standards that cannot be used to refuse development consent for residential care facilities

A consent authority must not refuse consent to a project application made pursuant to this Chapter for the carrying out of development for the purpose of a residential care facility on any of the following grounds:

Table 5 – Clause 48 RACF Compliance Table

Standard	Requirement	Comment	Complies
building height	*if all proposed buildings are 8 metres or less in height (and regardless of any other standard specified by another environmental planning instrument limiting development to 2 storeys), or*	The overall maximum height of the RACF building is 18.3m, being 10.3m above the 'cannot refuse' standard.	A merits assessment of this height is required. Refer to **section 8** of this report.
density and scale	*if the density and scale of the buildings when expressed as a floor space ratio is 1:1 or less,*	The overall GFA of the RACF building is 6,795.5m^2. In accordance with the GFA definitions under SEPP (HSPD), the overall site FSR is 1.28:1, which exceeds the 1:1 'cannot refuse' FSR control.	A merits assessment of this height is required. Refer to **section 8** of this report.
landscaped area	*if a minimum of 25 square metres of landscaped area per residential care facility bed is provided,*	A total of 100 RACF beds are proposed, requiring a minimum of 2500m^2 of landscaped area for use by residents of this facility. The dementia care garden located adjacent to the RACF and for exclusive use of RACF residents is 375m^2 in area. In addition, the common landscaped open space on the site totals 8,147.47m^2, of which 7,211.04m^2 (88.51%) is deep soil zone.	It is considered that the proposal provides sufficient landscaped open space for needs of the residents in accordance with SEPP (HSPD). Refer also to assessment in **section 8** of this report
parking for residents and visitors	*if at least the following is provided:* *(i) 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*	The required number of car parking spaces is provided on site for use by residents and visitors to the RACF building. The facility is proposed to accommodate 100 beds, requiring 10 car parking spaces. In addition, it is anticipated that there will	Complies

Standard	Requirement	Comment	Complies
	(ii) 1 parking space for each 2 persons to be employed in connection with the development and on duty at any one time, and *(iii) 1 parking space suitable for an ambulance.*	be 26 staff per shift, requiring 13 car parking spaces. This total requirement is 23 spaces for this component of the site. These 23 car parking spaces are dedicated within the basement of the building. Staff car parking is located at the lower basement level, and RACF visitor parking at the upper basement.	

Clause 50 Standards that cannot be used to refuse development consent for self-contained dwellings

A consent authority must not refuse consent to a project application made pursuant to this Chapter for the carrying out of development for the purpose of a self-contained dwelling (including in-fill self-care housing and serviced self-care housing) on any of the following grounds:

Table 6 – Clause 50 ILU Compliance Table

Standard	Requirement	Comment	Complies
Building Height	*if all proposed buildings are 8 metres or less in height (and regardless of any other standard specified by another environmental planning instrument limiting development to 2 storeys)*	The overall maximum height of the ILU buildings from natural ground level are: ▪ Brown St ILU – 26.29m ▪ Gate Keepers lodge – 14.6m ▪ Stephen St ILU – 17.3m ▪ Heritage Building – no change	New buildings exceed 'cannot refuse' standard. Merit assessment required. Refer **section 8** of this report.
Density and Scale	*if the density and scale of the buildings when expressed as a floor space ratio is 0.5:1 or less*	The total GFA of the ILU buildings is 12,152.7m^2. The overall FSR of the entire development is 1.28:1.	FSR exceeds 'cannot refuse' standards. Merit assessment is required. Refer **section 8** of this report.
Landscaped Area	*If a minimum of 30% of the area of the site is to be landscaped*	The site presents a total landscaped area of 8,147.47m^2, being 56.12% of the site. This exceeds the minimum requirement.	Complies Refer also **section 8** of this report.
Deep Soil Zones	*if, in relation to that part of the site (being the site, not only of that particular development, but also of*	Of the 8,147.47m^2 landscaped area, 7,211.04m^2 is deep soil landscaped area. This	Complies Refer also **section 8** of this report.

Standard	Requirement	Comment	Complies
	any other associated development to which this Policy applies) that is not built on, paved or otherwise sealed, there is soil of a sufficient depth to support the growth of trees and shrubs on an area of not less than 15% of the area of the site (the deep soil zone). Two-thirds of the deep soil zone should preferably be located at the rear of the site and each area forming part of the zone should have a minimum dimension of 3 metres	equals 88.51% of the total landscaped area.	
Solar Access	*if living rooms and private open spaces for a minimum of 70% of the dwellings of the development receive a minimum of 3 hours direct sunlight between 9am and 3pm in mid-winter*	A total of 73% of ILU dwellings will receive the minimum 3 hours of effective solar access.	Complies Refer solar access report prepared by Steve King at **Appendix Q** to this report.
Private Open Space for in-fill self care housing	*(i) in the case of a single storey dwelling or a dwelling that is located, wholly or in part, on the ground floor of a multi-storey building, not less than 15 square metres of private open space per dwelling is provided and, of this open space, one area is not less than 3 metres wide and 3 metres long and is accessible from a living area located on the ground floor, and* *(ii) in the case of any other dwelling, there is a balcony with an area of not less than 10 square metres (or 6 square metres for a 1 bedroom dwelling), that is not less than 2 metres in either length or depth and that is accessible from a living area.*	Three dwellings, all within the Heritage building, are located on the ground floor. Each of these dwellings is provided with the required ground floor open space. Apartment H-01 has a ground level open space of 57.04m^2. Apartment H-02 has a terrace of 15.03m2, with an additional grassed landscaped space area of 115m2. Apartment H-03 has two terraces slightly smaller than 15m2, but an additional large grassed landscaped space area of 120m2. All apartments above ground floor level are provided with the required balcony area, accessible directly from internal living areas. Refer plans for nominated areas.	Complies
Parking	*if at least the following is provided:* *1 car space for every 2*	A total of 109 car parking spaces are provided for use by ILU residents and	Complies

Standard	Requirement	Comment	Complies
	bedrooms	visitors, being in excess of the minimum 91 required for 181 ILU bedrooms. These are located at the basement level of the building and at grade adjacent to the Brown Street vehicular entry.	

Refer to **section 8** of this report for a merits assessment of the proposal's height and FSR.

7.3.4 Seniors Living Policy – Urban Design Guidelines for Infill Development 2004

The following table provides an assessment of the proposal against the Urban Design Guidelines for Infill Development, required by SEPP (HSPD).

Design Guideline Element	Assessment of compliance		
	Compliance with 'Objectives'	**Compliance with 'Design principles and better Practice'**	**Compliance with 'Rules of Thumb'**
Responding to context	The proposed building forms respond to the context of the site as detailed in the Urban Design analysis at Appendix F to this EA.		
Site planning & design	Building layout has had regard to the range of constraints presented on the site. Heritage and landscape elements are maintained and respected in the design of the buildings. The change in residential character around the site is responded to. Car parking is located for the most part underground, and a range of housing options are provided for future residents.	The design has provided good levels of internal amenity whilst not compromising privacy of neighbouring residences. A range of dwelling sizes and RACF accommodation options are provided, catering to a broad segment of the community. Buildings are located to address the street as much as is possible on the site, having regard to the location of significant vegetation. Dwellings are oriented to maximise solar access and cross ventilation. The landscape character of the site is retained, with 55% of the total site maintained as landscape area.	The proposal has optimised the provision of landscaped areas and deep soil zones.
Impacts on streetscape	It is considered that the design responds to the streetscapes surrounding the site and minimises negative impacts. The vegetated character to the Brown Street frontage is maintained, whilst the built edge to Cooper Street and Stephen Street is improved through the new building forms. Driveway entries to the site are retained at two, and do not dominate the street. Street frontages are activated as much	The building forms are highly articulated to provide interest in the facades. Varying materials are used both for each building and between the buildings. Greater articulation is presented in the Preferred Project to Stephen Street, whilst the height of the Brown Street ILU building has been reduced by one floor. Significant trees across the site are retained to maintain the vegetated character of the site. Site entries clearly delineate	The Council controls have been considered in the design of the proposal.

Design Guideline Element	Assessment of compliance		
	Compliance with 'Objectives'	**Compliance with 'Design principles and better Practice'**	**Compliance with 'Rules of Thumb'**
	as is possible on this site.	between the private and public domain. Common areas and private areas are also clearly defined within the site. Basement car parking is provided, and at grade driveway is appropriately designed and landscaped.	
Impacts on neighbours	Section 8 of this report demonstrates that there will be no adverse impacts on neighbours privacy, amenity, solar access or views. Section 8 also addresses building bulk which is considered to be appropriate for the site and locality.	The building forms are considered to have an acceptable impact on the amenity of neighbouring residences. Buildings are set back from the street frontage where appropriate, and buildings themselves are articulated to reduce perception of building bulk. Significant vegetation on the site is retained and will help to retain the green character of the site. New planting is proposed to replace trees proposed for removal. Building separation to neighbouring dwellings will retain solar access and ventilation to nearby dwellings. Privacy will also be retained.	Side setbacks provided are greater than 1.2m Living rooms to neighbouring dwellings will still receive 3 hours sunlight between 9am and 3pm in mid winter. Solar access to private open space of neighbouring dwellings will not be unreasonably reduced.
Internal site amenity	Usable private open space areas are provided to all dwellings, either at ground or first floor. Dwellings have safe and distinct entries. Pedestrian routes through the site are clearly delineated to all dwellings. The required level of solar access to each dwelling is achieved. Basement car parking is provided for residents and visitors to the site.	Dwellings are oriented to maximise solar access to living areas and private open spaces. Habitable rooms are located as far as possible from driveways, parking areas and pedestrian paths. Landscaped design through the centre of the site integrates usable areas with the shared pedestrian/vehicular zone. Open spaces on the site are generous, with the landscape area comprising 55% of the overall site area. A significant portion of this is dedicated as communal open space.	A separation of greater than 1.2m is provided between habitable rooms and car parks/ driveways.

7.3.5 SEPP (Building Sustainability Index: BASIX) 2004

An assessment of the proposed ILU buildings and the individual dwellings has been undertaken by Cardno ITC in respect to BASIX requirements, and a Basix Certificate has been issued for the proposal. This report and certificate are included at **Appendix S** to the Project Application EA report (November 2010).

7.3.6 SEPP 55 – Remediation of Land

SEPP 55 aims to promote the remediation of contaminated land for the purpose of reducing the risks of harm to human health or any other aspect of the environment by identifying what remediation work requires consent, and requiring that remediation work meets certain standards for the proposed use.

Consent no. 427/2001 was issued by Woollahra Council on 29 January 2002 for the undertaking of remediation works on the subject site, however this consent has not been commenced.

It is acknowledged that there is contaminated fill towards the northern end of the site, and also in the vicinity of the fuel storage tanks at the south western corner of the site. A number of reports have been prepared regarding this contamination, and a précis of these reports is included at **Appendix T** to the Project Application EA Report (November 2010).

Further to this, and in response to a request by the NSW Department of Planning in their correspondence dated 15 March 2010, a supplementary advice regarding site contamination prepared by Environmental investigation Services accompanies this PPR EA at **Appendix T**.

This advice outlines:

- Whether the previous investigations undertaken at the site will comply with SEPP 55;
- The outstanding remediation issues at the site; and
- What remedial works and other environmental assessments will be needed to complete the development.

In regard to SEPP 55, EIS are of the opinion that the investigation undertaken to date, together with the amendments to reports and additional investigations (outlined below), will comply with SEPP 55.

EIS has identified that the following remedial works and other environmental assessment will be needed to complete the development:

- Preparation of a Remedial Action Plan that incorporates the development details;
- Removal of the Above ground Storage Tank and incinerator followed by validation sampling;
- Waste classification sampling and preparation of waste classification letters;
- Installation of subsurface barrier and design of landscaping to minimise access to soil;
- Re-writing the Environmental Management Plan (EMP) to take account of the new development;
- Establishing an appropriate public notification of the EMP under section 149(2) of the Environmental Planning and Assessment Act 1979 or a covenant registered on the title to land under section 88B of the Conveyancing Act.

The proponent commits to the appropriate handling and disposal of contaminated materials on the site if they are uncovered during the excavation for basements, in accordance with an Environmental Management Plan to be prepared in this regard. Refer the Statement of Commitments in **section 9** of this EA.

7.3.7 SEPP 65 – Design Quality of Residential Flat Development and the Residential Flat Design Cods (RFDC)

SEPP 65 provides a framework to ensure a high design quality of new residential flat buildings. This policy applies to the Brown Street ILU building, the Gatekeepers lodge, the adaptively re-used heritage building and the Stephen Street ILU building on the site as they are all over 3 storeys in height and contain 4 or more dwellings.

A Design Verification Statement has been prepared by Dennis Rabinowitz of JPR Architects, which accompanies the architectural plans at **Appendix B**.

The SEPP outlines ten heads of consideration in the design and assessment of new flat buildings. Further, the Residential Flat Design Code includes rules of thumb for specific design elements within the new buildings.

The proposal has been designed having regard to SEPP 65 and the RFDC, and GMU has provided an updated SEPP 65 assessment of the revised scheme in their report at **Appendix F** to this EA. The conclusion of the assessment against each principle is provided below.

Context – Good design responds and contributes to its context. Context can be defined as the key natural and built features of an area. Responding to context involves identifying the desirable elements of a location's current character or, in the case of precincts undergoing a transition, the desired future character as stated in planning and design policies. New buildings will thereby contribute to the quality and identity of the area.

Summary comment from GMU:

> *The development retains and improves the existing seniors facility and provides much needed independent living in the area. Given the lack of adverse impacts due to the siting of new buildings within the existing tree canopy, respect to the existing heritage building and scale differential of adjoining buildings the proposal is considered acceptable and it meets the intent of this principle.*

Scale – Good design provides an appropriate scale in terms of the bulk and height that suits the scale of the street and the surrounding buildings. Establishing an appropriate scale required a considered response to the scale of existing development. In precincts undergoing a transition, proposed bulk and height needs to achieve the scale identified for the desired future character of the area.

Summary comment from GMU:

> *When considered against the built form pattern and scale of the surrounding area the proposal achieves an appropriate scale to the street and does not create adverse visual impacts when viewed from the public areas surrounding the site and therefore satisfies this principle.*

Built Form – Good design achieves an appropriate built form for a site and the building's purpose, in terms of building alignments, proportions, building type and the manipulation of building elements. Appropriate built form defines the public domain, contributes to the character of streetscapes and parks, including their views and vistas, and provides internal amenity and outlook.

Summary comment from GMU:

> *The built form of this proposal is appropriate to its context and indeed achieves a better design resolution than many of the existing apartment buildings in close proximity to the site. It adds a subtle character to the streetscape behind mature vegetation helped by the articulation of the façade and location of balconies and screens and is able to tie in sympathetically with the existing heritage building.*

Density – Good design has a density appropriate for a site and its context, in terms of floor space yields (or number of units or residents). Appropriate densities are sustainable and consistent with the existing density in an area or, in precincts undergoing transition, are consistent with the stated desired future density. Sustainable densities respond to the regional context, availability of infrastructure, public transport, community facilities and environmental quality.

Summary comment from GMU:

> *The proposed density is appropriate for the use, placing minimal additional demands on surrounding facilities and infrastructure. Further, it affords a high number of users the possibility of independent living beyond what is possible in conventional residential development which is a very positive outcome.*

Resource, energy and water efficiency – Good design makes efficient use of natural resources, energy and water throughout its full like cycle, including construction. Sustainability is integral to the design process. Aspects include demolition of existing structures, recycling of material, selection of

appropriate and sustainable materials, adaptability and reuse of buildings, layouts and built form, passive solar design principles, efficient appliances and mechanical services, soil zones for vegetation and reuse of water.

Summary comment from GMU:

Available information indicates the development responds well to issues of sustainability.

Landscape – Good design recognises that together landscape and buildings operate as an integrated and sustainable system, resulting in greater aesthetic quality and amenity for both occupants and the adjoining public domain. Landscape design builds on the existing site's natural and cultural features in responsible and creative ways. It enhances the development's natural environmental performance by co-ordinating water and soil management, solar access, micro-climate, tree canopy and habitat values. It contributes to the positive image and contextual fit of development through respect for streetscape and neighbourhood character, or desired future character.

Summary comment from GMU:

> *The landscape concept provides a scheme which is responsive to the heritage significance of the gardens, the varying topography on the site and the uses in association with seniors living. It is considered to demonstrate an appropriate outcome which will contribute to the landscape character of the site and surrounding suburb.*

Amenity – Good design provides amenity through the physical, spatial and environmental quality of a development. Optimising amenity requires appropriate room dimensions and shapes, access to sunlight, natural ventilation, visual and acoustic privacy, storage, indoor and outdoor space, efficient layouts and services areas, outlook and ease of access for all age groups and degrees of mobility.

Summary comment from GMU:

> *Unit layouts are deep but a necessary result of providing extra circulation space for wheelchair access, and the amenity of units is preserved by a well considered overall arrangement of corner units and good internal planning.*
>
> *Generous and distinct entries are provided toward the centre of the development at the primary access point for pedestrians, and internal access is well considered and equitable given the constraints of a steep site.*

Safety and Security – Good design optimises safety and security, both internal to the development and for the public domain. This is achieved by maximising overlooking of public and communal spaces while maintaining internal privacy, avoiding dark and non-visible areas, maximising activity on streets, providing clear, safe access points, providing quality public spaces

Summary comment from GMU:

> *Safety and security are well addressed through centralised access, high visibility to primary entrances and external circulation, and by provision of a continuous boundary fence.*

Social dimensions and housing affordability – Good design responds to the social context and needs of the local community in terms of lifestyles, affordability, and access to social facilities. New developments should optimise the provision of housing to suit the social mix and needs in the neighbourhood or, in the case of precincts undergoing transition, provide for the desired future community. New development should address housing affordability by optimising the provision of economic housing choices and providing a mi of housing types to cater for different budgets and housing needs.

Summary comment from GMU:

> *The proposed development provides a much needed facility and is proposed to function in such a way as to be continually available to ageing persons with varying financial backing. The result is a lasting alternative to aged care or dependence on family members – a service that is rare and likely to be in increasingly high demand in the future.*

Aesthetics – Quality aesthetics require the appropriate composition of building elements, textures, materials and colours and reflect the use, internal design and structure of the development. Aesthetics should respond to the environment and context, particularly to desirable elements of the existing streetscape or, in precincts undergoing transition, contribute to the desired future character of the area.

Summary comment from GMU:

The proposed development is aesthetically pleasing, fitting and reinforces as far as possible the residential character of the development and the surrounding area. The siting and massing of buildings retains as far as possible the lush, green appearance of the existing site as viewed from the North and West.

In addition to the GMU assessment, Steve King has undertaken an assessment of the proposal against the solar access requirements of SEPP 65, which accompanied the Project Application EA Report – November 2010 at **Appendix Q**. An updated statement in light of the revised design is included at Appendix Q of this PPR EA report. The Residential Flat Design Code provides the following as a 'rule of thumb' in the design of new apartment buildings:

- *Living rooms and private open spaces for at least 70% of apartments in a development should receive a minimum of three hours direct sunlight between 9am and 3pm in mid winter.*

  In dense urban areas a minimum of two hours may be acceptable.

- *Limit the number of single-aspect apartments with a southerly aspect (SW-SE) to a maximum of 10 per cent of the total units proposed.*

- *Developments which seek to vary from the minimum standards must demonstrate how site constraints and orientation prohibit the achievement of these standards and how energy efficiency is addressed (see Orientation and Energy Efficiency).*

Extensive "view from the sun" analysis was undertaken of the digital model of the proposal which shows all sunlit surfaces at a given time and date. In determining 'effective sunlight' for characterisation of compliance for glazing and private open space, the analysis was informed by the application of the relevant Land and Environment Court Planning Principle (The Benevolent Society v Waverley Council [2010] NSWLEC 1082), such that

- *Large angles of incidence to the glazing surface, and unusably small areas of sunlit glazing were ignored. All sun patches of reasonable size were quantified as 'complying'.*

- *Sun access to partially and fully sunlit glazing for over three hours total between 9am and 3pm mid winter was classified as 'complying'.*

- *'Effective sun' includes all sun that is demonstrably available to a point of interest, including sun earlier than 9am or later than 3pm.*

- *Where appropriate, extended periods of sun available to bedrooms was considered to contribute significantly to the amenity of any apartment that has an otherwise unfavourably oriented living area.*

Solar access to each apartment was tabulated in 30 minute intervals to quantify the timing and extent of solar access to living areas (and where appropriate, bedrooms) of all apartments.

The report concludes that the development achieves 70% of apartment with complying periods of effective sun, as set out in the RFDC. It is noted that the majority of the apartments thus characterised as complying actually enjoy mid-winter sun well in excess of the nominated '3 hour standard'.

If one takes account of effective sun before 9am and after 3pm, that is demonstrated to be unlikely to be alienated by adjacent development, 57 out of 82, being a full 70% of the apartments are projected to comply at the minimum 3 hour standard. A further six apartments are projected to receive a minimum 2 hours effective sun at mid-winter, achieving an overall 73% compliance level.

Steve King concludes that *it is considered legitimate under the broad intents of the RFDC to add these apartments to those I characterise as complying by strict interpretation of the Rule of Thumb. In my considered opinion, the total proportion of apartments that may be characterised as complying with the performance requirements of the RFDC is 73%, where a minimum of 70% is required by that code.*

7.3.8 SEPP (Infrastructure) 2007

State Environmental Planning Policy (Infrastructure) 2007 aims to facilitate the effective delivery of infrastructure across the State by:

(a) improving regulatory certainty and efficiency through a consistent planning regime for infrastructure and the provision of services, and

(b) providing greater flexibility in the location of infrastructure and service facilities, and

(c) allowing for the efficient development, redevelopment or disposal of surplus government owned land, and

(d) identifying the environmental assessment category into which different types of infrastructure and services development fall (including identifying certain development of minimal environmental impact as exempt development), and

(e) identifying matters to be considered in the assessment of development adjacent to particular types of infrastructure development, and

(f) providing for consultation with relevant public authorities about certain development during the assessment process or prior to development commencing.

In this regard, development that is proposed to generate a threshold amount of traffic must, in accordance with Clause 104 of this policy, be referred to the RTA for concurrence.

For apartment or residential flat buildings, the relevant thresholds are:

- *300 or more dwellings on a site with access to any road, or*
- *75 or more dwellings on a site with access to classified road or to a road that connects to a classified road (if access is within 90m of connection, measured along the alignment of the connecting road).*

The proposed number of dwellings on the site is 79 ILUs and 100 RACF beds. The subject site is not located fronting a classified road, or within 90m of a connection to a classified road. As such, referral to the RTA under Clause 104 of the Infrastructure SEPP is not required.

7.3.9 Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005

Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 (Sydney Harbour Catchment REP) has the following aims with respect to the Sydney Harbour Catchment:

(a) to ensure that the catchment, foreshores, waterways and islands of Sydney Harbour are recognised, protected, enhanced and maintained:

(i) as an outstanding natural asset, and

(ii) as a public asset of national and heritage significance,

for existing and future generations,

(b) to ensure a healthy, sustainable environment on land and water,

(c) to achieve a high quality and ecologically sustainable urban environment,

(d) to ensure a prosperous working harbour and an effective transport corridor,

(e) to encourage a culturally rich and vibrant place for people,

(f) to ensure accessibility to and along Sydney Harbour and its foreshores,

(g) to ensure the protection, maintenance and rehabilitation of watercourses, wetlands, riparian lands, remnant vegetation and ecological connectivity,

(h) to provide a consolidated, simplified and updated legislative framework for future planning.

Under the REP, the subject site falls within the Sydney Harbour Catchment area, but is not included in the Foreshore and Waterways Area, or any specific zone.

Specific principles are included in Part 2 of the REP, which are to be considered and, where possible, achieved in the preparation of environmental planning instruments and development control plans under Part 4 of the Act, and in the preparation of environmental studies and master plans for the purposes of the Act.

Clause 13 of the SREP set out planning principles for land within the Sydney Harbour Catchment. These are addressed in the table below.

Table 7 – Planning Principles – Sydney Harbour Catchment

Planning Principle	Response	Complies
(a) development is to protect and where practicable improve the hydrological, ecological, and geomorphological processes on which the health of the catchment depends	Hydrological processes will not be affected by this proposal.	Yes
(b) the natural assets of the catchment are to be maintained and where feasible restored for their scenic and cultural values and their biodiversity and geodiversity	Natural assets on the site include the heritage and other significant trees, which are being protected as part of the proposal. It is noted that 88 trees, many of which have low retention value or are weed species will be removed. Replacement trees are proposed where appropriate.	Yes
(c) decisions with respect to the development of land are to take account of the cumulative environmental impact of development within the catchment	The proposal is not considered to exceed the environmental capacity of the land when taken in context of the surrounding development.	Yes
(d) action is to be taken to achieve the targets set out in *Water Quality and River Flow Interim Environmental Objectives: Guidelines for Water Management: Sydney Harbour and Parramatta River Catchment* (published in October 1999 by the Environment Protection Authority) such action to be consistent with the guidelines set out in *Australian Water Quality Guidelines for Fresh and Marine Waters* (published in November 2000 by the Australian and New Zealand Environment and Conservation Council)	All natural waterflows beneath the site will be maintained. No adverse runoff will occur that would affect water quality of streams that flow to Sydney Harbour.	Yes
(e) development in the Sydney Harbour Catchment is to protect the functioning of natural drainage systems on floodplains and comply with the guidelines set out in the document titled *Floodplain Development Manual 2005* (published in April 2005 by the Department)	The proposal will not significantly affect the functioning of natural drainage systems in the vicinity of the site.	Yes
(f) development that is visible from the waterways or foreshores is to maintain, protect and enhance the	The proposed buildings will not be visible from the harbour or foreshores	Yes

Planning Principle	Response	Complies
unique visual qualities of Sydney Harbour	due to the extensive tree cover over the site.	
(g) the number of publicly accessible vantage points for viewing Sydney Harbour should be increased	The Harbour is not visible from the public domain surrounding the property.	N/A
(h) development is to improve the water quality of urban run-off, reduce the quantity and frequency of urban run-off prevent the risk of increased flooding and conserve water.	An on-site detention tank is proposed to contain the possibility of increased runoff from the site and reduce its intensity during a storm event.	Yes
(i) action is to be taken to achieve the objectives and targets set out in the *Sydney Harbour Catchment Blueprint* as published in February 2003 by the then Department of Land and Water Conservation	Sydney Harbour Catchment Blueprint is a catchment plan that presents the strategic direction for natural resource and environmental management in the catchments of Port Jackson / Parramatta River and Sydney Northern Beaches for 10 years to 2013. The Catchment Blueprint provides a guide to the actions of all levels of government and sets priorities for investment in natural resource and environmental management. It identifies long term catchment targets and the management actions and processes to achieve these. It is not specifically relevant to assess a development proposal against the blueprint.	N/A
(j) development is to protect and if practicable rehabilitate watercourses wetlands riparian corridors remnant native vegetation and ecological connectivity within the catchment.	Such systems will not be impacted as a result of the proposed development.	N/A
(k) development is to protect and if practicable rehabilitate land from current and future urban salinity processes and prevent or restore land degradation and reduced water quality resulting from urban salinity	Urban salinity is not an issue on this site.	N/A
(l) development is to avoid or minimise disturbance of acid sulfate soils in accordance with the *Acid Sulfate Soil Manual* as published in 1988 by the Acid Sulfate Soils Management Advisory Committee.	The site is not affected by Acid Sulfate Soils.	N/A

The proposal is considered to meet the relevant heads of consideration under clause 13 of SREP Sydney Harbour Catchment.

7.3.10 Woollahra LEP 1995

Woollahra LEP 1995 is the principal local environmental planning instrument governing development on the site. The following presents an assessment against the relevant requirements of WLEP 1995.

Clause 8 Development Control Tables

The subject site is zoned 5 Special Use Zone under the LEP, with “Hospital” marked on the zoning map.

Objectives of the zone

The objectives of the Special Use zone are:

(a) to identify land:

(i) which is used for particular public and community facilities, educational facilities, railway purposes or urban infrastructure, or

(ii) which is reserved for road widening purposes being land coloured yellow, edged with a broken red line and marked with letters "a.r.r." in red (signifying arterial road reservation—proposed road widening) or the letters "l.r.r." in red (signifying local road reservation—proposed road widening), and

(b) to improve access to and along the foreshores where opportunities arise.

Use of the subject site will be retained for aged care and seniors housing purposes, which is consistent with the zoning and current use of the land.

Development which may be carried out only with development consent

The particular land use indicated by red lettering on the land use map (being hospital)*, including land uses ordinarily incidental or ancillary to the particular use (other than the particular use of railways); local community facilities; land uses related to railways authorised by the* Transport Administration Act 1988*, but only where the use indicated by red lettering is a railway use; utility installations (other than gas holders or generating works); works to enable public access to and along the foreshores.*

The special use identified for the site under its zoning is 'hospital'. As discussed above, in accordance with *SEPP (Housing for Seniors and People with a Disability)*, development for the purposes outlined in that SEPP may be undertaken, with consent, on land where 'hospitals' are a permissible use.

Development which is prohibited

Any development other than development included as permissible without consent or with consent.

Clause 10B Site Area and Frontage Standards

Clause 10B provides that:

(1) A site must not be developed for the purpose of a residential flat building containing 3 dwellings or fewer unless the width of the site at the front alignment is 15 metres or more.

(2) A site must not be developed for the purpose of a residential flat building containing 4 or more dwellings unless:

(a) the site area is 930m^2 or more, and

(b) the width of the allotment at the front alignment is 21 metres or more.

The subject site meets the minimum site area and frontage requirements set by clause 10B(2). The site area is 14,780m^2 and the minimum site frontage is 121m to Cooper Street.

Clause 11 Floor Space Ratio

No Floor Space Ratio is allocated to the subject site on the Floor Space Ratio map. No such standard applies.

Clause 12AA Objectives of Maximum Building Height Development Standards

The objectives of the maximum building height development standards set by clause 12 are as follows:

(a) to minimise impact of new development on existing views of Sydney Harbour, ridgelines, public and private open spaces and views of the Sydney City skyline,

(b) to provide compatibility with the adjoining residential neighbourhood,

(c to safeguard visual privacy of interior and exterior living areas of neighbouring dwellings,

(d) to minimise detrimental impacts on existing sunlight access to interior living rooms and exterior open space areas and minimise overshadowing,

(e) to maintain the amenity of the public domain by preserving public views of the harbour and surrounding areas and the special qualities of streetscapes.

These are addressed in **section 8** of this report.

Clause 12 Height of Buildings

Clause 12 required that:

(1) A building shall not be erected on land within a height zone to a height greater than the maximum height shown on the height map as applicable to land within that height zone.

(2) If, on the height map, 2 height limits are indicated as applying to the land within a height zone:

(a) the height indicated by the colouring on the height map shall be the overall height limit for a building for the purpose of subclause (1), and

(b) no building or part of a building shall be erected on land within the height zone to a height greater than the figure shown bracketed on the height map, above the highest part of the land (exclusive of any access corridor) or the crown of any road to which the land has direct frontage, whichever is the higher.

The maximum building height shown as applicable to the subject site on the Height of Buildings map is 9.5m. Under WLEP, height in relation to a building means:

the greatest distance measured vertically from any point on the building to the existing ground level immediately below that point.

The proposed buildings on the site present a range of building heights. The highest points on the buildings are approximately 26.29m above existing ground level for the Brown Street ILU, and approximately 15.99m above existing ground level for the Stephen Street ILU. Each of the buildings are well articulated in both vertical and horizontal planes and the majority of these buildings are of heights below these maximums.

In accordance with s75R of the EP&A Act, it is considered that a SEPP 1 variation is not required in order that the consent authority may consent to a breech to this height standard. Notwithstanding this, an assessment of the proposal's merits, having regard to the objectives of the standard, is provided in **section 8** of this report.

Clause 24 Land Adjoining Public Open Space

Clause 24 of the LEP provides that

(1) This clause applies to all land adjoining public open space.

(2) The Council shall not grant consent to an application for development on land which adjoins public open space unless it has made an assessment of the impact of the development on the amenity of the public open space and it has taken into consideration whether the development is in conflict with any plan of management for the public open space.

Council's *Plan of Management 1996 – Local Parks* sets out a management framework for Dillon Street Reserve, as well as s large number of other local parks throughout the LGA.

It is considered that the proposed development adjoining Dillon Street Reserve will not have any significant impact on the operation or management of the Reserve as Public Open Space as set out in the Plan of Management. Buildings will be set back from the park's southern boundary, and open space on the Scottish Hospital Site will be retained immediately south of the Dillon Street Reserve, preserving the interface that is currently enjoyed between the two properties.

Clause 25 Water, Wastewater and Stormwater Systems

Clause 25 provides that

(1) The Council must not grant consent to the carrying out of development on land or subdivision of land to which this plan applies for the purpose of a habitable building unless it is satisfied that adequate water and sewerage services will be available to the land it is proposed to develop.

(2) The Council must not grant consent to the carrying out of development on land or the subdivision of land to which this plan applies for any purpose unless it is satisfied that adequate provision has been made for the disposal of stormwater from the land it is proposed to develop.

The subject site is currently connected to adequate Sydney Water sewer and fresh water supplies. These will be augmented to cater for the increased demand generated by future residents

The utilities and stormwater management report prepared by Cardno ITC and accompanying the Project Application EA Report (November 2010) at **Appendix P and R** confirms that there are adequate water services connecting to the site to accommodate the proposed future demand. Stormwater will be managed through on site detention, rainwater re-use and flood management to ensure runoff does not exceed the current levels experienced from the site.

Clause 26 Heritage

The subject site is listed under WLEP 1995 as being an item of environmental heritage. The listing in the LEP includes the following elements on the subject site:

Scottish Hospital—main hospital building, grounds, gardens, terracing, 3 Moreton Bay Figs, Port Jackson Fig, Norfolk Island Pine, Weeping Lilli Pilli, Holm Oak

As the site is listed as being subject to heritage provisions, clause 26 must be addressed

Clause 26 states the following

(1) A person shall not, in respect of a building, work, relic, place or tree that is a heritage item or that is an item that is part of a heritage item group:

(a) demolish or alter the building or work, or

(b) damage or move the relic, or excavate for the purpose of exposing the relic, or

(c) damage or despoil the place, or

(d) damage or move the tree, or

(e) erect a building on the land that comprises the place, or

(f) subdivide the land on which the building, work, relic or tree is situated or that comprises the place, or

(g) damage any tree on land on which the building, work or relic is situated or on the land which comprises the place,

except with the consent of the Council.

(2) The Council shall not grant consent to a development application required by subclause (1) unless it has taken into consideration the extent to which the carrying out of the proposed development would affect the heritage significance of the item and of any heritage item group of which the item is part and any stylistic or horticultural features of its setting.

(3) The Council shall not grant a consent required by subclause (1) unless it has considered a statement of heritage impact or a conservation plan or both as may be required by the Council.

(4) Notwithstanding subclause (1), a tree that is a heritage item may be removed in part or in whole, without development consent, in circumstances where the tree has been damaged by natural

events and causes such as storms, pests and pathogens and, as a result, the tree poses an immediate threat to the safety of people or property.

A Heritage Impact Statement has been prepared by NBRS+Partners to assist in the assessment of the proposed works. The HIS accompanies the Project Application EA Report (November 2010) at **Appendix U**. Further, a separate Statement of Archaeological Impact has been prepared by Casey & Lowe (refer **Appendix V to** the Project Application EA Report (November 2010)) and a Landscape Heritage Assessment has been prepared by Musecape Pty Ltd (**Appendix H** to the Project Application EA Report (November 2010)).

These reports find that the proposal has responded appropriately to the heritage significance of the site and its component elements. Various recommendations are made regarding the ongoing management of the heritage significant site elements, which are incorporated into the Statement of Commitments at **section 9** of this EA report.

Clause 27 Development in the vicinity of heritage items, heritage item group, heritage conservation areas, archaeological sites or potential archaeological sites.

The Council must take into consideration the likely effect of the proposed development on the heritage significance of a heritage item, heritage item group, heritage conservation area, archaeological site or potential archaeological site, and on its setting, when determining an application for consent to carry out development on land in its vicinity.

In response to this clause, the NBRS+Partners HIS at **Appendix U** to the Project Application EA Report (November 2010) states that

"The two new buildings proposed will replace existing buildings, but will be clearly identifiable in the immediate area. The buildings have been designed to reduce their footprint on the site and to enable a garden setting to be retained and enhanced within the boundary of the site.

The proposed works would not affect the views and vistas identified in the Paddington Heritage Conservation Area 2008. The development would be located within the existing boundary of the site and would preserve the main views and vistas along Stephen Street, Cooper Street and Brown Street. The views within Dillon Reserve would remain unchanged.

The existing tree canopy would be retained, and would screen the proposed development to reduce its visual impact on long and medium-distance views to the site. Some maintenance of trees would be carried out on the recommendation of specialist horticultural advice.

The proposed development would be stepped to reduce the bulk of the building at higher levels and to reduce their impact on views across the site.

There is potentially archaeological significance within the boundary of the site. This development application process seeks consent for the proposal."

Clause 28 Heritage Conservation Areas

The subject site is located within the Paddington Conservation Area. As such, the provisions of clause 28 apply to development on the land.

Clause 28 states the following:

(1) A person shall not, in respect of a heritage conservation area:

(a) demolish or alter a building or work within the area,

(b) damage or move a relic, or excavate for the purpose of exposing or removing a relic, within the area,

(c) damage or despoil a place within the area, or

(d) erect a building on or subdivide land within the area,

except with the consent of the Council.

(2) The Council shall not grant consent to an application required by subclause (1) unless it has taken into consideration the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage conservation area.

(3) The Council shall not grant consent required by subclause (1) unless it has considered a statement of heritage impact or a conservation plan or both as may be required by the Council.

The HIS prepared by NBRS+Partners has been prepared to accompany the application and to assist in the assessment of the proposed works.

A Conservation Management Plan prepared by NBRS+Partners was used to guide the proposed redevelopment of the site generally, and the adaptive reuse of the former Scottish Hospital. Its policies and recommendations are reflected in the heritage aspects of the current application.

Clause 31 Development of known or potential archaeological sites

(1) The Council may grant consent to the carrying out of development on an archaeological site that has Aboriginal heritage significance (such as a site that is the location of an Aboriginal place or a relic, within the meaning of the National Parks and Wildlife Act 1974) or a potential archaeological site that is reasonably likely to have Aboriginal heritage significance only if:

(a) it has considered an assessment of how the proposed development would affect the conservation of the site and any relic known or reasonably likely to be located at the site prepared in accordance with any guidelines for the time being notified to it by the Director-General of National Parks and Wildlife, and

(b) except where the proposed development is integrated development, it has notified the local Aboriginal communities (in such a way as it thinks appropriate) of the development application and taken into consideration any comments received in response within 21 days after the notice was sent, and

(c) it is satisfied that any necessary consent or permission under the National Parks and Wildlife Act 1974 has been granted.

(2) The Council may grant consent to the carrying out of development on an archaeological site that has non-Aboriginal heritage or a potential archaeological site that is reasonably likely to have non-Aboriginal heritage significance only if:

(a) it has considered an assessment of how the proposed development would affect the conservation of the site and any relic known or reasonably likely to be located at the site prepared in accordance with any guidelines for the time being notified to it by the Heritage Council, and

(b) (Repealed)

(c) it is satisfied that any necessary excavation permit required by the Heritage Act 1977 has been granted.

A Statement of Archaeological Impact has been prepared by Casey & Lowe and accompanied the Project Application EA Report – November 2010at **Appendix V**. This report states that there are no known Indigenous archaeological artefacts located on the site.

7.3.11 Woollahra Council DCPs and Non-Statutory Policies

There are a number of Woollahra Council Development Control Plans that apply to the subject site. Each of these is addressed in turn below.

Paddington Heritage Conservation Area DCP 2008

A detailed assessment of the proposal against the Paddington Heritage Conservation Area DCP has been undertaken by NBRS+Partners in the Heritage Impact Assessment accompanying this EA report at **Appendix U** to the Project Application EA Report (November 2010).

The assessment finds that the proposal is consistent with the requirements of the DCP and will not adversely impact the heritage significance of the Paddington Conservation Area.

Off Street Car Parking and Servicing Facilities DCP 2009

Whilst Council's DCP sets out car parking rates and design guidelines for on site car parking, it does not specify car parking rates for seniors housing. Further, specific car parking provisions are included within SEPP Seniors, AS 1428 and AS2890 that apply to seniors housing, which are adopted across the State. The provision and design of on site car parking has been undertaken in accordance with these use-specific guidelines. It is considered that compliance with the SEPP and AS controls assumes compliance with Council's DCP.

Access DCP 2004

Specific accessibility controls are listed within SEPP Seniors, AS 2890 and the BCA which have been addressed and adopted in the design of the proposed seniors housing development. These standards are recognised across the state as being applicable to the proposed development, and compliance with these standards is considered to ensure compliance with Council's DCP.

Section 94 Contributions Plan 2002 (March 2005 Update) and Section 94A Development Contributions Plan 2005

Woollahra Council has adopted a s94 Contributions Plan as well as a s94 A Contributions Plan, which provide a framework for the levying of developer contributions for new development within the municipality.

Council staff have indicated that where new development is proposed which increases the number of dwellings in a locality, the s94 plan is usually invoked to calculate the relevant development contribution. Where new residential development is not proposed, the s94A plan is utilised.

Council's Section 94 Contributions Plan sets out a per-dwelling levy for new residential development across the Woollahra LGA, which is to be used by Council to provide specific community facilities to cater for increased residential population demand.

Based on the indexed s94 contributions rates provided by Council, and in accordance with their s94 Contributions Plan, the per-dwelling rate applicable to the subject development is **$123,829** based on the table below.

Table 8 – s94 Contribution Rates by Type of Development

Residential (persons)	**Recreation**	**No. Apartments**	**Total**
1-bedroom unit (1.3)	$1,057/unit	13	$13,741
2-bedroom unit (1.8)	$1,463/unit	30	$43,890
3-bedroom unit (2.2)	$1,788/unit	36	$64,368
4 (or more) bedroom unit (2.7)	$2,194/unit	0	0
Total (without admin fee)			$121,999
Admin fee of 1.5c/$			$1,830
Total with Admin fee			**$123,829**

The s94A Contributions Plan enables the levying of any development approved by Council for an amount equal to 1% of the 'cost of works' of the development (where a s94 levy is not also imposed). Such levies are pooled, and allocated to the funding of various services and community facilities across the LGA.

If such a levy was to be imposed on the subject proposal, it would total $765,000.00, based on a proposed cost 'cost of works' to carry out the development (not being Capital Investment Value) presently estimated at $76,500,000.00. This figure will be reviewed following receipt of development consent.

Planning Principles for the Scottish Hospital Site

On 11 October 2010, Woollahra Council adopted a set of Planning Principles for the Scottish Hospital Site. Whilst these Principles do not hold statutory weight, they have been adopted by Council, after consultation with the community, to identify what Council believe to be an appropriate set of site specific guidelines for redevelopment of the site. They will also be used by Council staff as a guideline to inform a submission to the DoP regarding the proposed Project Application, during its public notification stage.

Prior to adoption of the Planning Principles, a Draft set of principles were circulated by Council. These were addressed in the preparation of the design scheme and the proposal's response to the Draft Principles has been included in the various community stakeholder meetings and information sessions held to date.

The proposed design's response to the adopted Planning Principles has been addressed in detail as part of the updated Urban Design Analysis report prepared by GMU which accompanies this EA at **Appendix F**.

There are a number of Council's adopted principles that are already embodied in the Urban Design principles for the site which informed the final urban design layout. A number of the Council's principles are not strictly adopted in the Urban Design Principles, but are consistent with the design intent for the scheme.

However, components of Council's principles are not considered to be appropriate for the site. These are as follows:

- *New buildings are not to exceed the density and bulk of the previously approved buildings (refer to DA931/2001 as identified in Council's records) (This does not prevent the redistribution of building mass from its location in the original DA)*
- *New buildings are not to involve excavation which extends beyond the footprint of proposed buildings*
- *Landscaping is not to be used as a planning solution to justify additional building bulk.*

Those proposed principles that are not supported propose to restrict the built form on the site to that established by a previously approved Development Application and seek to limit the extent of excavation to under the buildings. These principles are not supported for the following reasons:

- The previous DA has no statutory weight and has lapsed. The Council at no time has sought to prepare a DCP or guidelines for the site that constrain the potential of the site to that of the previous DA.
- The developable area of the previous approval is not economic and would not allow the social and community benefits proposed by the Church as part of this development.
- Constraining the site to the arbitrary numbers in the previous DA is not necessary as an acceptable and quality outcome can be achieved for the site by following the principles and footprints developed as part of the detailed urban design analysis undertaken by GMU.
- The previous DA did not offer any potential for additional open space and located massing very close to Dillon Reserve. The proposed layout keeps all the built form well back from the reserve to the portion of the site that is created by the gully and where it has no significant visual impact.
- The proposal to limit excavation does not take into account the need to shore up the existing retaining structure to Cooper Street or allow for a linked car park under the buildings to the northern end of the site. A linked car park actually reduces the extent of car park excavation required,

reduces the number of vehicle entry points under buildings and minimises the visual impact of the car park entry points.

- The principle regarding landscape and building bulk is not justified. The site's landscape is the most prominent heritage and amenity element on this unique site. There is significant cost in reinstating and adapting the existing heritage items including the landscape terraces. This imperative combined with the community outcomes intended for this site for housing seniors and those less able to afford this accommodation requires a certain outcome for the site. Locating the built form between the trees to enable the maximum retention of vegetation is a positive outcome as it maintains the current landscape character around the site, mitigates the visual impact of any development and continues the visual and heritage contribution of the site to the surrounding area.

Further detailed comments regarding the Council's Planning Principles is contained within the Urban Design report prepare by GMU at **Appendix F**.

Draft DCP Stormwater Drainage Management 2006

Council's Draft DCP has informed the stormwater management strategy for the site prepared by Cardno ITC and detailed in their report and plans at **Appendix R** to the Project Application EA Report (November 2010) .

As detailed in that report, a meeting was held with Council Engineer Michael Casteleyn at Council's Chambers, in which Michael handed Council's study for the Rushcutters Bay Catchment and outlined that the On-Site Detention is to be sized using a Time-Area hydrograph model such as "DRAINS" as opposed to Council's pre-determined values noted in the DCP.

Draft Flood Risk Management DCP 2004.

This Draft DCP has informed the flood risk management response prepared for the site by Cardno ITC and is addressed in their report at **Appendix R** to the Project Application EA Report (November 2010).

7.3.12 NSW Government Floodplain Development Manual 2005

The primary objective of the NSW Government's Flood Prone Land Policy is to reduce the impact of flooding and flood liability on individual owners and occupiers of flood prone property, and to reduce private and public losses resulting from floods. At the same time, the policy recognises the benefits flowing from the use, occupation and development of flood prone land. The policy promotes the use of a merit approach which balances social, economic, environmental and flood risk parameters to determine whether particular development or use of the floodplain is appropriate and sustainable.

A fundamental principle of floodplain risk management is to assess applications within the strategic framework of a floodplain risk management plan and not in isolation or individually. The relevant sections of the management plan are to be included in councils LEPs, and flood related DCPs and policy. If a type of development, outside those identified as appropriate in the management plan is approved, as discussed in Appendix I, the management plan should be altered to reflect this change.

The approach to flood management on the site is informed by this policy and is addressed by Cardno ITC in their Utility Services & Infrastructure report at **Appendix R** to the Project Application EA Report (November 2010).

8 Environmental Assessment

8.1 Built Form and Urban Design Impacts

Extensive analysis of built form and urban design implications was undertaken at the beginning of the design process to inform the preferred design approach for the proposed buildings. An updated Urban Design Analysis report has been prepared by GMU which accompanies this EA report at **Appendix F**.

This analysis, and the identification of relevant opportunities and constraints, along with the requirements of the client brief, informed the design and location of buildings proposed in this scheme.

8.1.1 Options for the Siting and Layout of Building Envelopes

The urban design analysis resulted in the preparation of two options for the siting of buildings, with a preferred option resulting post stage 1 community consultation. These options were informed by the site constraints and opportunities analysis undertaken by GMU, and formed the basis of discussion for the first round of community consultation. The two preliminary options are shown below.

Figure 15 – Option 1 Site Layout Diagram

The following extract from the Urban Design Report summarises Option 1:

> *The Urban Design layout for Option 1 seeks to provide the maximum opportunity to expand the Dillon Street Reserve as a land dedication for public use (subject to a Voluntary Planning Agreement with Council or provision of the land as privately owned but publicly accessible by the Presbyterian Church). The built form would be located as far to the south of the site as possible whilst still respecting the other design principles. This approach locates the significant building massing to the south which responds to the change in built form seen in the existing area – greater built form and more apartment development with larger building footprints to the south.*

This approach maintains the northern portion of the site with the finer grain and lower scale development exists surrounding the site as a 'green landscaped space' actually making this potion of the site permanently public if agreement can be reached with Council. This response is sensitive to the change in sale and grain and it ensures no negative impacts to the more 'delicate' built form character north of Glen Street.

The proposed maximum heights in RLs proposed for the site and storeys above street level are shown on the plan. It can be seen that the tallest massing is positioned in amongst the trees, setback roughly a similar distance to the existing nursing home block. A small lower scale portion of the built form could extent towards Brown Street to provide some much needed surveillance of the street and allow some activity through an entry point to the site in this location. The built form would be set in amongst the trees and would not exceed the current tree canopy height to ensure it did not detract from the silhouette of the area.

The building footprints are located from the mid portion of the site to the south, positioning built form generally where the existing operating theatre building is located and where the existing aged care building is currently situated with some additional building potential between the large figs to link to Brown Street at grade. The master plan seeks to adaptively reuse the existing heritage building for residential aged care uses and to provide for a finer grain 'gate house' type building adjacent to the existing hospital to the west which will allow for a pedestrian connection into the development and its communal open space from Cooper Street.

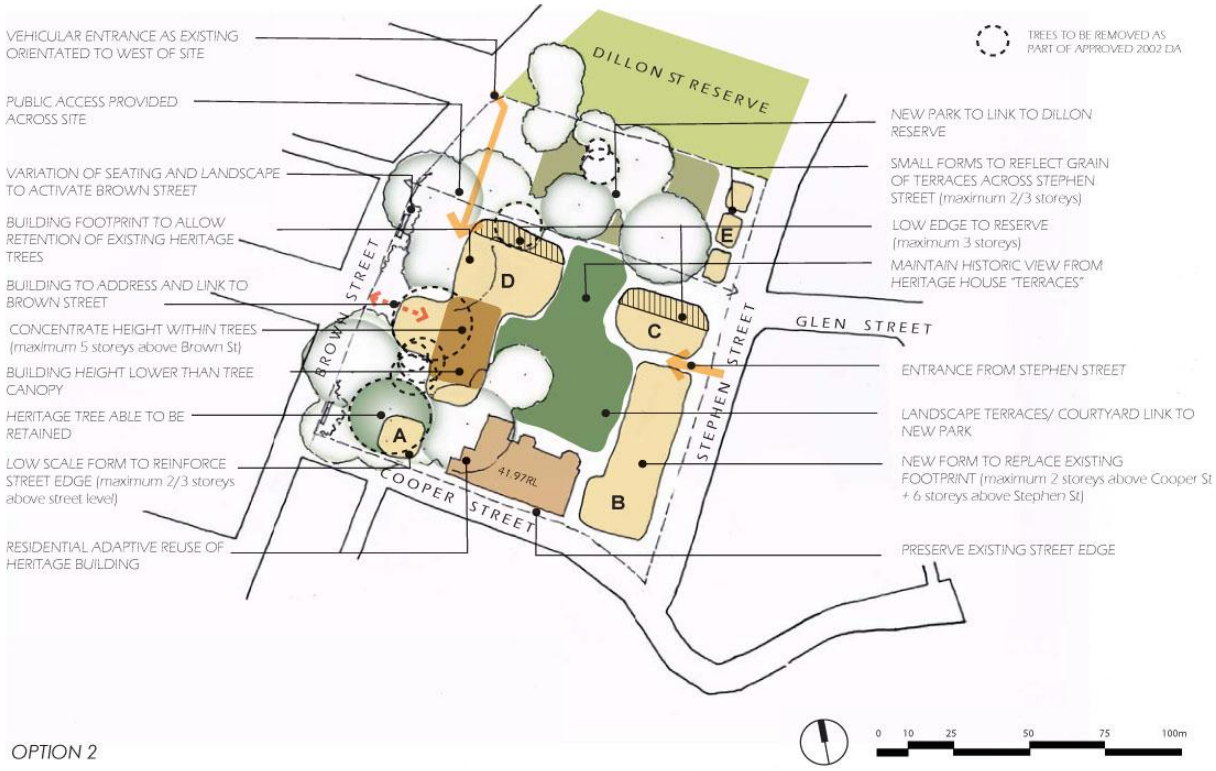
There is an opportunity to create a new public space node on the corner of Brown and Copper Streets which would include a small shelter for residents waiting for the community bus and sitting area looking out over the gully and tree canopy on the site. To Stephen Street the height of any new development would be generally equivalent to the height of the existing operating theatre block, stepping down to the north. This form would be setback from Stephen Street to allow some street tree planting but will still be visible to the street as is the current operating theatre. The new development should offer an interesting and well designed building form rather than the existing unsightly void and blank walls of the operating theatre.

To Dillon Street Reserve and the potential new public land dedication the development would present a low scale edge with a maximum 3 storeys to the park and a maximum of 5 storeys immediately behind. The development scale will then respond to the topography and step up the slope to the south towards the heritage hospital building.

The central portion of the site will be a landscaped space that reinterprets and reinstates the heritage landscape terraces with a central communal open space that creates and maintains the heritage vista to the north. This space will cascade down to the north to link with the potential new park dedication and create a green corridor through the site.

All heritage trees will be retained with as many other existing trees as possible.

Figure 16 – Option 2 Site Layout Diagram



The following extract from the Urban Design Report summarises Option 2.

Option 2 investigates a lower height for the site by reducing the tallest massing by roughly one story of height and introducing a greater stepping of the massing with smaller building footprints at upper levels. The difference with the first option is that the massing is relocated to the edge of Stephen Street towards the east boundary and would be provided as lower-scale 2-3 storey forms that edge the street and would be designed to respond to the fine grain narrow lot character evident in the northern part of Stephen Street.

The option cannot deliver the same amount of potential public open space dedication as seen in Option 1 due to the relocation of the massing to Stephen Street but it provides the remainder of the space to the west of the proposed low scale form as public park dedication.

As with Option 1 the remainder of the new buildings are similar and have been located as far to the south of the site as possible whilst still respecting the other design principles. The proposed maximum heights in RLs and storeys above street level are shown on the plan.

The majority of the building footprints are located from the mid portion of the site to the south, as with Option 1 the build form has been position generally where the existing operating theatre building is located and where the existing aged care building is currently situated with some additional building potential between the large figs to link to Brown Street at grade. This master plan option also seeks to adaptively reuse the existing heritage building for residential aged care uses and to provide for a fine grain 'gate house' type apartment building adjacent to the existing hospital to the west which will allow for a pedestrian connection into the development and its communal open space from Cooper Street.

As with Option 1 there is an opportunity to create a new public space node on the corner of Brown and Cooper Street which would include a small shelter for residents waiting for the community bus and a sitting area looking out over the gully and tree canopy on the site. Greatest height is still to be concentrated to the west and setback from both Brown and Cooper Streets a considerable distance and tucked within the western third of the site amongst the existing trees.

The height of this taller portion will be in the order of a storey less than Option 1 and will sit further within the tree canopy around it to the west and south.

To Stephen Street the height of any new development would be generally equivalent to the height of the existing operating theatre block but it will extent to street level with interesting and well designed building form rather than the existing unsightly void and blank walls as with Option1.

To Dillon Street Reserve and the potential new public land dedication, the southern development would present a low scale edge with a maximum of 3 storeys to the park and a maximum of 5 storeys behind. The development scale will then respond to the topography as with Option 1 and step up the slope to the south towards the heritage hospital.

The central portion of the site will be a landscaped space that reinterprets and reinstates the heritage terraces with a central communal open space that creates and maintains the heritage vista to the north. This space will cascade down to the north to link with the new park dedication and create a green corridor through the site.

All heritage trees will be retained as with may other existing trees as possible.

The key differences between Option 1 and Option 2 are summarised as follows:

- Option 1 locates a higher building form on the Brown Street ILU building. This is considered acceptable as the form is located within the existing tree canopy, is well set back from Brown Street and will have little visual impact on any nearby dwelling dur to that separation and the height of the trees.
- Option 2 keeps the proposed height of the Brown Street ILU lower by extending the proposal along Stephen Street and closer to Dillon Reserve.

Following community consultation and workshop sessions, feedback was received from the community and where appropriate, incorporated into the design of the buildings and site layout to help resolve identified concerns.

Alterations made to the Option 1 and 2 schemes were adopted to form the original Project Application (November 2010), with the key features of the Final Masterplan as follows:

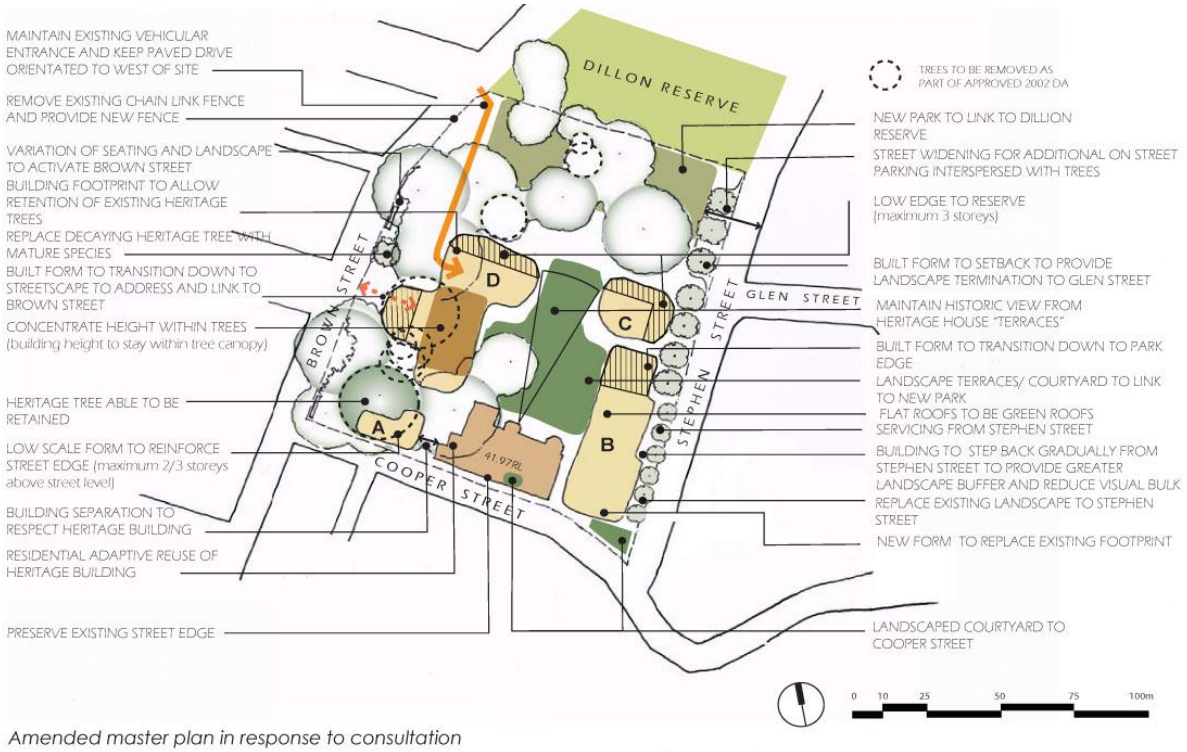
- The final Masterplan seeks to provide the maximum opportunity to expand the Dillon Street Reserve as a potential land dedication for public use, delivering a generous public open space that opens up an improved visual and physical connection from Stephen Street to Brown Street. The Final Masterplan will significantly increase the potential size of the Dillon Street Reserve while ensuring the proposed maximum heights (Brown Street ILU) stay within the existing tree canopy heights and provide a considerable setback from both Brown and Cooper Streets.
- The height of the new development to Dillon Street Reserve and the potential land dedication presents a low scale edge with a maximum of 3-4 storeys with a maximum of 5 storeys immediately behind.
- Location of the built form generally close to the footprint of the existing operating theatre and the existing aged care buildings. The proposed building form is longer than the existing buildings to accommodate the requirements of PAC.
- The built form to replace the existing aged care facility will have additional built form to transition down to the streetscape and link to Brown Street to provide an address to that street.
- The proposed smaller and finer grain built form to Cooper Street has been repositioned to ensure a view line for the existing terraces to the heritage tree located near the existing heritage hospital.
- The Masterplan continues to adaptively reuse the existing heritage buildings for independent living units and all heritage trees will be retained, where recommended by the arborist, with as many other existing trees as possible.

- The central portion of the site will be reinterpreted back to a landscaped space including the heritage terraces with a central communal open space that creates and maintains the heritage vista to the north. This space will cascade down to the north to link with the potential new land dedication and create a green corridor through the site.

Some of the most significant changes included in the Project Application in response to the consultation process which differ from option 1 and 2 were:

- Changes to the proposed building form along Stephen Street to step the building back gradually from the edge of the street to provide greater landscaped buffer and reduce visual bulk.
- The height of the new building along Stephen Street would be generally equivalent to the height of the existing operating theatre block but it will cascade down towards the open space and potential land dedication, following the topography of the site.
- Deletion of the potential resident vehicular entry from Stephen Street, and allocate its use solely as a service entry.
- Inclusion of street widening to Stephen Street to allow for reconfigures on street parking interspersed with trees, so to ease the tight dimensions around the intersection of Glen Street.
- The existing vehicular entrance from Brown Street reconfigured as the only main resident and visitor vehicular entrance for the whole site.

Figure 17 – Preferred Option Diagram



Amended master plan in response to consultation

This preferred Masterplan Option was used to guide the architectural resolution of building design and location on the site for the Project Application (November 2010).

The design has been further modified following public notification of the Project Application and receipt of correspondence from the NSW Department of Planning & Infrastructure

A comparative analysis of the PPR design changes detailed in section 2.4 and 5 of this report against the Project Application scheme is undertaken as part of the updated Urban Design Report at **Appendix F**.

8.1.2 Topographic Characteristics

The topographic characteristics of the site are vastly different than those of the surrounding properties, which has resulted in the need for a different design approach for the proposed buildings. From the Cooper Street boundary to the northern boundary at Dillon Reserve, there is a 14m height difference overall.

Land across the site falls away steeply from the south west corner of the site (corner of Brown and Cooper Streets) in a northerly and easterly direction, to a low point along the northern boundary. The steep change in grade results in a ground level approximately 4 – 9.5m below the level of Brown Street at the site's western boundary. This affords an opportunity to locate buildings within this gully.

As the site flattens out towards the north, the site becomes more visible to the surrounding public domain and the relative height of buildings more prominent.

To respond to the topography, the urban design analysis identified opportunities for taller buildings to be located towards the south of the site, to minimise their impact on the surrounding character of the area.

The taller building elements are located towards the south of the site in the area set below the ground level of Cooper and Brown Streets. Buildings have been designed to 'step down' from the southern end to the northern end of the site.

8.1.3 Detailed Envelope/Height and Contextual Studies Undertaken

In the preparation of an Urban Design Analysis for the site, GMU undertook detailed envelope and contextual studies to determine appropriate building scale for the site.

These envelopes considered the natural site features, adjacent building heights and significant views across the site which informed the possible location and heights of buildings possible on the site.

These studies are included at **Appendix F** to this EA report.

8.1.4 Comparable Height Study

The following diagram is extracted from the updated Urban Design Report at **Appendix F**. It provides a comparison between the proposed building heights and those of buildings surrounding the site.

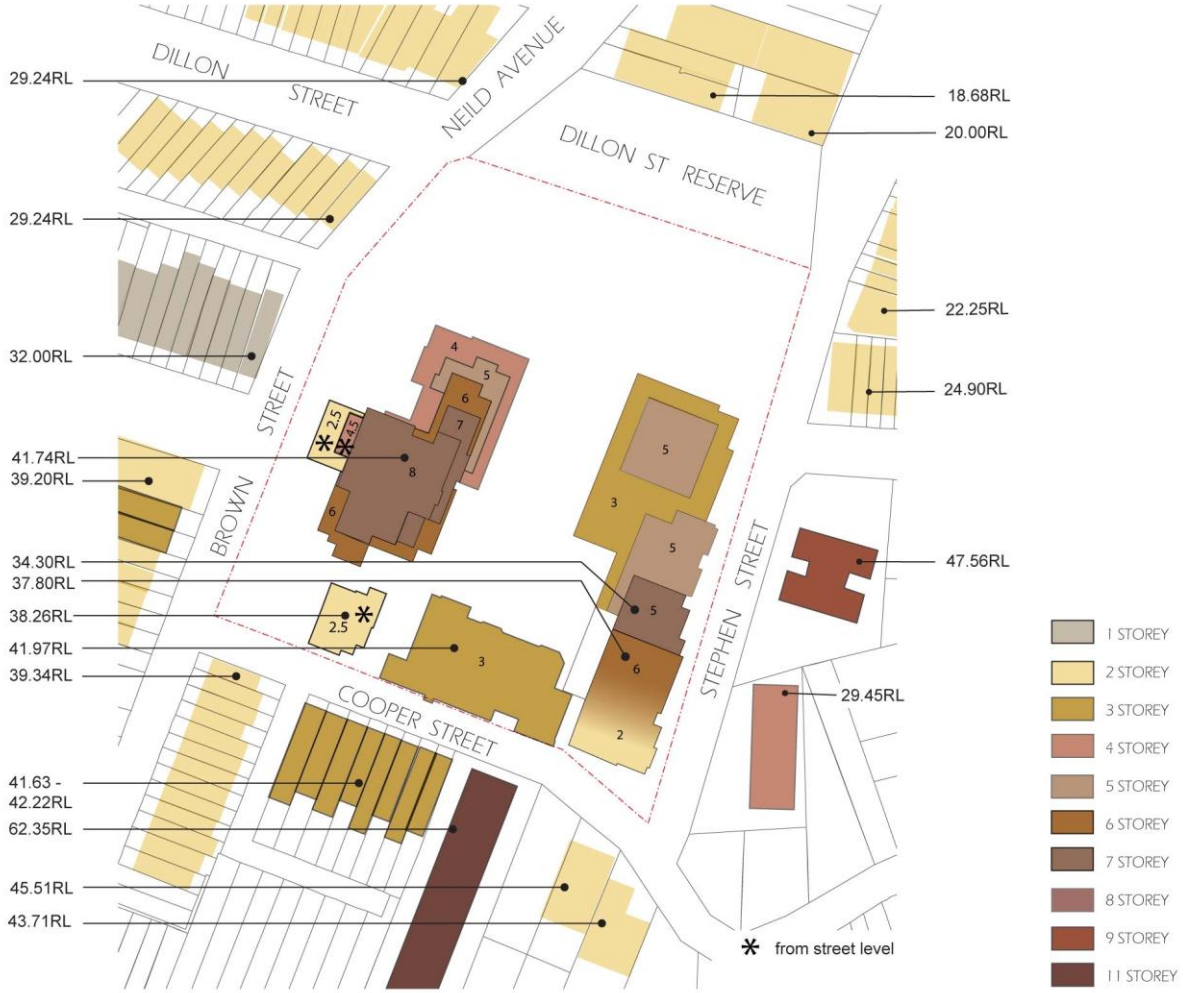
It is noted that the maximum height of the Brown Street ILU has been reduced from RL 44.90m to RL 41.740mAHD (with maximum lift overrun height of 42.590mAHD) through the removal of the upper floor from this building.

The Urban Design Report provides a comparative analysis between the original proposal and the preferred project, in terms of building height, scale and relationship to the surrounding residential neighbourhood. The updated Urban Design Report demonstrates how the Preferred Project scheme relates appropriately to the surrounding built form context along all three street interfaces and with the Dillon Street Reserve to the north.

The Urban Design Report concludes that

> *The architectural response addresses all the principles put forward by the Final Master Plan as well as addressing the comments put forward by the Department of Planning & Infrastructure with the creation of an appropriate relationship to the height of the heritage item, transitioning down and creating a better response to all street edges and to Dillon Reserve which are both positive outcomes for the site.*

Figure 18 – Comparable Height Study



8.1.5 Height, Bulk and Scale

What is Proposed

The maximum overall height of the new proposed buildings, from natural ground level, are as follows:

- Brown Street ILU – 26.29m
- Gatekeepers Lodge – 14.6m
- Stephen Street RACF – 18.3m
- Stephen Street ILU – 17.3m

The Heritage building presents no change in building height from existing.

The total GFA proposed is 18,948.2m^2, resulting in an FSR of 1.28:1. This GFA has been calculated in accordance with the definition contained within SEPP (HSPD).

Standards for Consideration

Controls relating to height and FSR are:

- SEPP (HSPD) presents the following 'cannot refuse' standards:
  - RACF height of 8m and FSR standard of 1:1
  - ILU Height of 8m and FSR of 0.5:1

SEPP Seniors does not contain any particular objectives for its 8m 'cannot refuse' height. It is considered that this control is tailored towards new development within an existing low density suburban context, allowing an effective 2-storey plus pitched roof form. An upper limit of 8m height on this site is not considered to be appropriate given the specific site characteristics, and the scale of existing buildings immediately surrounding the site. Further, the local Council's LEP stipulates a height limit of 9.5m, which is higher than the SEPP's 'cannot refuse' control.

- Woollahra LEP presents:
  - a maximum height control of 9.5m across the site and
  - no FSR control.

Woollahra LEP's height limit is accompanied by a set of objectives which would be used to inform the assessment of any variation to the numerical height limit sought by an applicant under Part 4 of the EP&A Act. Under Part 3A, by virtue of clause 75R of the Act, no formal variation via SEPP 1 is required to vary a Council's height control. However, for the purpose of demonstrating the merits of the proposal, an assessment against the objectives of the standard has been undertaken.

When assessing the merits of the proposed FSRs, it is relevant to note that Woollahra Council's LEP has no established FSR allocation to this site, thereby acknowledging that the extent and intensity of development should be determined having regard to the merits of the proposal.

Relevant Planning Principles

In assessing bulk, height and scale, it is useful to make reference to relevant Planning Principles established by the Land and Environment Court. In this instance, those most relevant are listed below.

- Planning Principle – Height Bulk and Scale (Veloshin v Randwick Council [2007]), which states:
  - The appropriateness of a proposal's height and bulk is most usefully assessed against planning controls related to these attributes such as maximum height, floor space ratio, site coverage and setbacks. The questions to be asked are:
    1. *Are the impacts consistent with impacts that may be reasonably expected under the controls?*
    2. *How does the proposal's height and bulk relate to the height and bulk desired under the relevant controls?*
  - Where the planning controls are aimed at preserving the existing character of an area, additional questions to be asked are
    3. *Does the area have a predominant existing character and are the planning controls likely to maintain it?*
    4. *Does the proposal fit into the existing character of the area?*
  - Where the planning controls are aimed at creating a new character, the existing character is of less relevance. The controls then indicate the nature of the new character desired. The question to be asked is
    5. *Is the proposal consistent with the bulk and character intended by the planning controls?*
  - Where there is an absence of planning controls related to bulk and character, the assessment of a proposal should be based on whether the planning intent for the area appears to be the preservation of the existing character or the creation of a new one. In cases where even this

question cannot be answered, reliance on subjective opinion cannot be avoided. The question then is

6. *Does the proposal look appropriate in its context?*

From this principle, those most relevant to this proposal are questions 1, 2, 3 and 4, and in relation to building bulk, 6.

- Planning Principle – Criteria for assessing impact on neighbouring properties (Pafburn v North Sydney Council [2005])
  - The following questions are relevant to the assessment of impacts on neighbouring properties:
    1. *how does the impact change the amenity of the affected property? How much sunlight, view, or privacy is lost as well as how much is retained?*
    2. *how necessary and/or reasonable is the proposal causing the impact?*
    3. *how vulnerable to the impact is the property receiving the impact? Would it require the loss of reasonable development potential to avoid the impact?*
    4. *does the impact arise out of poor design? Could the same amount of floor space and amenity be achieved for the proponent while reducing the impact on neighbours?*
    5. *does the proposal comply with the planning controls? If not, how much of the impact is due to the non-complying elements of the proposal?*

Drivers for the Project

As discussed earlier in this report, the Presbyterian Church has two fundamental drivers for this project:

- to provide a range of accommodation options for older persons, including the provision of 45% concessional places to address affordability needs of older residents.
- to ensure that the development is financially self-sustaining, minimising reliance on government grants and helping to maintain high quality care for residents.

In order to achieve both these objectives, the financial model for the site requires a balance between the number of RACF beds and the number if ILU apartments. The proposed mix of 100 RACF beds and 79 ILU apartments in their various sizes has been analysed as the best composition to achieve ongoing operational financial self-sustainability for the development. The GFA of the ILU apartments is a factor of identified market preference for 2 and 3 bedroom apartments, with fewer one bedroom apartments. The identified demand mix has been reflected in the proposed scheme to ensure a product that is marketable and achieves the right balance between affordability and choice.

It is the Church's strong intention to provide as many seniors living and residential care places as is both financially and environmentally feasible on the site. It is considered that the proposed floorspace yield has been appropriately designed and located in such a way as to balance the need for aged care places with bulk, scale and site intensity impacts that may reasonably result.

Assessment against SEPP and LEP controls

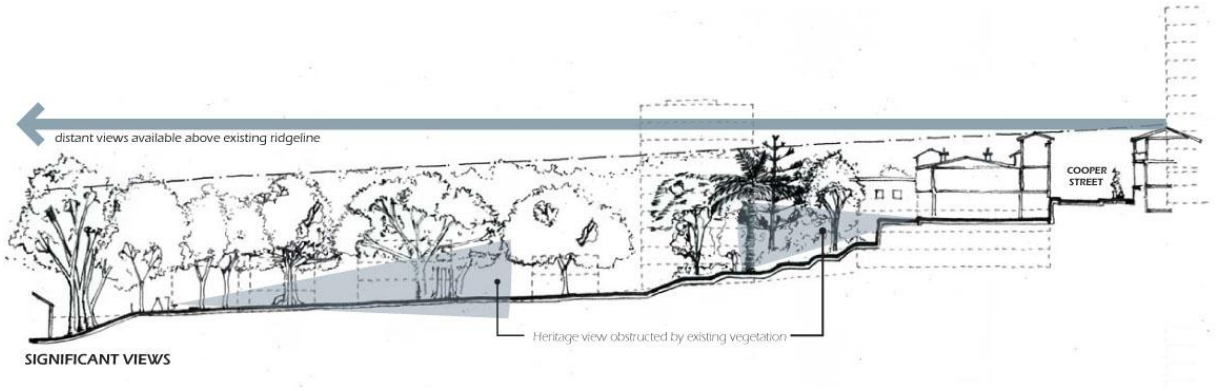
In respect to the SEPP Seniors 'cannot refuse' standards, Woollahra Council's height objectives and the assumed objective of GFA controls, the following comments are made:

- In respect to the SEPP Seniors 'cannot refuse' height controls, an upper height limit of 8m on this site is not considered to be appropriate given the specific site characteristics, and the scale of existing buildings immediately surrounding the site. Further, the local Council's LEP stipulates a height limit of 9.5m, which is higher than the SEPP's 'cannot refuse' control.
- Extensive view analysis has demonstrated that the proposed buildings will not impinge on views from public or private spaces to Sydney Harbour, ridgelines, public or private open spaces or views of the Sydney City skyline. The building forms have been designed to sit below the view line over the site which is established by the ridge line of the Scottish Hospital Building when viewed from

Cooper Street. Further, view analysis by sim urban from neighbouring residential properties shows that views to these identified areas will not be impinged.

Refer to the updated View Analysis at **Appendix W** to this EA report.

Figure 19 – View Line Section



- The proposed building forms have been designed for purposes that are vastly different than the predominant use of buildings surrounding the site, and have responded to a significant range of site constraints. The impact of height and bulk has been mitigated through the articulated architectural design of the buildings and their positioning on the site to conserve significant heritage and landscape values, whilst being set back as far as practicable from the public domain and neighbouring properties.

  The tallest elements of the buildings are located towards the southern end of the site, in the vicinity of other surrounding tall built forms. The topography in this southern portion of the site, dropping sharply from the levels of Cooper Street and Brown Street enables higher buildings to be located without them breaking the appearance of the tree canopy over the site, nor projecting significantly higher than the overall height of surrounding buildings. Whilst the maximum height in metres from ground level may be taller than the majority of the surrounding buildings, when the relative absolute height of the buildings (RLs) is considered, the height of the proposed buildings will still be broadly consistent with the height character of the area.

  Moving north through the site, building forms are stepped gradually lower, reflecting the topography of the site and being more responsive to the surrounding RLs of existing neighbouring buildings. The development presents a three storey form at the northern-most section of the site, which is consistent with the scale of buildings surrounding this section of the site.

  When heights of existing and proposed buildings are compared in absolute terms, the following observations can be made:

  - The westernmost building forms fronting Brown Street are equivalent to or lower than the existing building heights on the opposite side of Brown Street at a height of 8m above the kerb level. Whilst the proposed building does step higher, these sections are also set back further from the street, mitigating the overall impact of the absolute building height and building bulk. View analysis has demonstrated that the tallest portion of the building cannot be seen from pedestrians in Brown Street due to its setback from the boundary.
  - The height of the Gatekeepers Lodge building (RL 38.2) is lower than the terraces immediately across the road at RL 39.34, and also lower than the existing height of the Scottish Hospital building immediately to its east at RL 41.97. This building does not project above the 9.5m height limit at the street frontage.
  - When viewed from Cooper Street, the Stephen Street RACF building is comparable in height (RL 37.6) yet slightly lower than the ridge of the lower, easternmost, section of the heritage

building, at RL38. It is noted that in this section of Cooper Street are significantly taller residential buildings ranging in height from RL 41.6 to RL 62.35.

Along Stephen Street, this building steps down in absolute height as it moves north, following the topography – from RL 37.6 in the vicinity of 38 Stephen Street (itself at RL 29.45) to RL 34.2 in the vicinity of 40 Stephen Street (itself at RL 47.56). Due to the nature of this building's use for a Residential Aged Care Facility, it is constrained in terms of design requirements for each nursing floor. For this reason, the building is stepped back from the street frontage along its length to provide the greatest separation from neighbouring dwellings, yet still providing a workable nursing floor layout for its future operation. The vertical proportioning of the Stephen Street RACF building façade helps to ameliorate the effect of what would otherwise be an expanse of flat façade.

- The Stephen Street ILU building presents a roof height of RL 31.6, but steps down to a three storey form fronting the open space to the north. Towards Stephen Street the building also steps back from the site boundary.
- The building forms have been placed and designed to sit within the tree canopy of the site, which ensures that the buildings do not project above the silhouette of the site when viewed from a distance.
- Overall it is considered that the proposed buildings are compatible with the height of the buildings surrounding the site and have been designed to mitigate impacts of height having regard to the varying site constraints and design requirements for the proposed use.

- Visual privacy of interior and exterior living areas of neighbouring dwellings will be retained. Refer to **section 8.4.3** below for more detailed discussion regarding this issue.
- The proposed buildings will not significantly impact solar access to interior living rooms and exterior open space areas of neighbouring buildings. Refer to **section 8.4.1** below for more detailed discussion regarding this issue.
- There are no views of the Harbour from surrounding public places that will be impeded by the scheme. Special qualities of surrounding streetscapes will be maintained.
- As discussed above, the proposed building forms have been designed to minimise their impacts of bulk and scale on surrounding residents. Buildings have been set back from site boundaries and are articulated to provide variation to facades. Upper levels of buildings are stepped back from the primary building facades to reduce the perception of building bulk at these levels.

  The buildings step down in height from south to north, and especially in the case of the Brown Street ILU from the centre of the site towards the street, thereby reducing their scale at the interfaces of the public domain.

  - The Brown Street ILU has been designed to accommodate the majority of ILU dwellings on the site. The scale of the building is ameliorated through substantial articulation of the form through the use of materials and the placement of balconies, and the stepping back of the building form from the ground floor, through the mid and upper levels to the topmost floor. The overall height of this building has been reduced by 1 storey from that proposed in the original project application, thereby further reducing the impact of height and scale.
  - The Gatekeepers lodge has been designed to reflect the scale and proportioning of terrace dwellings along Cooper Street. The vertical proportioning of this building minimises its perceived scale.
  - From Cooper Street, the overall massing of the Stephen Street RACF is sympathetic to the scale and proportioning of the heritage building. When viewed from Stephen Street, the uppermost floor is set back from the main building façade so as to appear recessive in scale. The building has been designed to step down the hill from the south to the north reflecting the topography of the site and the scale of buildings around this portion of the site. The articulation of the building breaks the form up into four portions which are reflective of the proportioning of

terrace dwellings further to the north along Stephen Street. Additional articulation has been introduced to the Stephen St RACF building at its northern end as a result of the re-planning of the internal floorplan layout at this location. These changes enable the presentation of a more residential building style to Stephen Street.

  - The Stephen Street ILU building is linked to the RACF but is stepped further west and is lower in form. The building is well articulated, utilising balconies and apartment design to break up the bulk of the building.

- Whilst the number of residents on the site will be high, the intensity of the use and likely impacts on surrounding residents generated by site residents is not considered to be significant. Although such accommodation can be inhabited by persons as young as 55 years of age, the occupancy demographics of other seniors facilities indicates that residents are in the vicinity of 70 years or older when they first move in to seniors living developments. This age group is typically less active and mobile than the rest of the population.
- Studies of established seniors living developments have demonstrated that these are not high traffic generating uses. The traffic report prepared by Halcrow identifies the proposed use as a low traffic generating use. The car parking numbers required by SEPP Seniors also reflect the low car use by residents of such accommodation.

Consideration of Planning Principles

An assessment is made of the proposed height and FSR in respect to the relevant planning principles.

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

The analysis of privacy, overshadowing and building scale relationships finds that the positioning of the buildings will not result in a significantly greater impact on neighbouring dwellings or the public domain than that which would result from a scheme which complies with the building height standard.

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

The relevant controls for the site include Special Use controls under Woollahra LEP, as well as those within SEPP Seniors. Woollahra does not include a control for 'bulk' (FSR), having regard to the special use of this site.

The proposal exceeds the numerical height controls desired by the relevant controls. That said, the proposed buildings are consistent with the overall height of buildings towards the southern end of the site.

Noting that there is no upper limit FSR control for this site, it is considered that the proposed buildings result in a form which is complementary to the urban context of this locality.

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

The character of the area surrounding the subject site changes from the north to the south. Buildings neighbouring the site towards the north are smaller in scale, in a predominantly terrace-style form with other single storey detached dwellings interspersed. Towards the south of the site, taller building forms characterise the streets. Residential flat buildings and tall terrace houses on the steep hill slopes increase the scale of buildings surrounding the site.

If the 9.5m height control was applied strictly across the site, it would result in a built form character that falls well below the predominant height of buildings surrounding the site, due to the significant change in site level from that of Cooper and Brown Street.

The subject site is an anomaly within the context of the subdivision of Paddington. It is a large site, set within a highly fragmented subdivision pattern. The dimensions of the site, along with the topographical characteristics do not readily avail themselves to redevelopment for terrace form development, nor is this suitable to the type of development proposed. In this regard, it is considered that the planning

controls applicable to the site are not likely to be able to maintain the terrace character of the broader Paddington area for this site.

- *Does the proposal fit into the existing character of the area?*

Despite the residential character being predominantly of a terrace form, Paddington is a highly urbanised precinct noted within the Draft East Subregional Strategy as having one of the highest urban densities in the subregion at over 25 dwellings per hectare. Woollahra Council is tasked with accommodating an additional 2900 dwellings within its LGA by 2031. Its new comprehensive LEP which is not yet publicly available must demonstrate where these additional dwellings are to be located. Sites such as this one should be viewed as opportunities to make a reasonable contribution towards accommodating increased residential densities, in ways that respect the character of the surrounding area.

It is considered that the proposed development achieves this objective.

- *Does the proposal look appropriate in its context?*

The building locations and scale were guided by the Urban Design analysis prepared by GMU and included at **Appendix F** to this EA report. That analysis addresses the height and scale relationships between potential buildings on the subject site and those in the wider locality. The proposed building designs are consistent with the results of the context analysis and are considered to look appropriate in the urban context of the site.

In terms of impacts resulting from bulk and scale the following comments are made

- *How does the impact change the amenity of the affected property? How much sunlight, view, or privacy is lost as well as how much is retained?*

Sections 8.4.1, **8.4.2**, **8.4.3 and 8.4.6** below demonstrate that there is no significant impact resulting from the proposed buildings on neighbouring dwellings, in terms of overlooking, overshadowing or view loss.

- *How necessary and/or reasonable is the proposal causing the impact?*

There is a demonstrated regional need for seniors living and RACF accommodation within the eastern Sydney region. The proposal seeks to provide for a range of accommodation options at varying price points for older members of the community whose current accommodation does not meet their current needs.

- *How vulnerable to the impact is the property receiving the impact? Would it require the loss of reasonable development potential to avoid the impact?*

Whilst is not considered that there are significant impacts resulting to neighbouring properties, the reduction in floor space available would hinder the provision of much needed affordable accommodation for seniors within the community.

- *Does the impact arise out of poor design? Could the same amount of floor space and amenity be achieved for the proponent while reducing the impact on neighbours?*

It is considered that the design of the proposal is well considered and achieves high quality built form. The buildings have regard to the client requirements as well as the various constraints pertaining to the site. Reorganisation of floor space on the site would compromise the heritage and landscape values of the site and would result in a design that is not as appropriate to its context.

- *Does the proposal comply with the planning controls? If not, how much of the impact is due to the non-complying elements of the proposal?*

An assessment of the proposal against the relevant planning controls is undertaken above. The resultant impacts neighbouring properties are not considered to be significantly different from those which would result from a complying scheme.

Summary Comment

Overall it is considered that the heights of the buildings and their building bulk meet the relevant objectives of the height control and assumed objectives of FSR controls generally. The proposed forms have been demonstrated on their merit to achieve the planning principles set by the Land and Environment Court. Despite the breech to Council's 9.5m height limit and having regard to the merits of the scheme, the height and GFA are considered acceptable.

8.1.6 Visual impact

The proposed buildings have been designed to appear residential in character and are sited to minimise visual impact on heritage items within the site as well as those external to the site.

Within the site, buildings are appropriately separated from the heritage building in order to retain an appropriate curtilage around the building. The proposed buildings also frame the heritage terraces and the view lines between the heritage house and Dillon Reserve.

Building proportions and materials are sympathetic to the existing heritage building on site as well as to surrounding residential development.

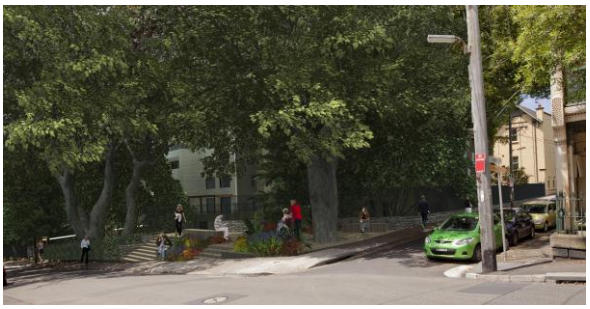
An assessment has been undertaken on the impact of the proposal on the Paddington Conservation area which is contained within the Heritage Impact Statement prepared by NBRS+Partners, at **Appendix U** to the Project Application EA Report (November 2010).

The visual impact on the surrounding area is considered to be appropriate and will not detract from the heritage character of the precinct.

8.1.7 View Analysis

Street views from vantage points around the site have been created, and are shown below. Larger scale copies of these images are included at **Appendix B**. These photomontages demonstrate the proposed view to the site from the public domain, and also from within the site.

Figure 20 – Photomontages



Picture 11 – Corner Brown Street and Cooper Street looking north-east

Picture 12 – Cooper Street looking north

Picture 13 – Corner Cooper Street and Stephen Street, looking north west

Picture 14 – Glen Street looking west

Picture 15 – From Stephen Street at Dillon Reserve, looking south

Picture 16 – From Dillon Reserve looking south

Picture 17 – From 40 Stephen Street, looking west

Picture 18 –From Glenview Street looking east

Picture 19 – From corner Brown and Nield Avenue, looking south east

Picture 20 – Internal piazza looking east

A number of views are also identified as being of heritage significance to and from the site. These are identified in "*The Conservation Plan*" prepared by David Semple Kerr and ranked within the Conservation Management Plan prepared for this site in June 2006 and updated November 2010. The ranking of these views was undertaken to assist future decision making for conservation and development of the site.

These identified views and vistas include:

Exceptional significance – view to the Scottish Hospital from the northern grassed terrace

High significance – partial views to and from the Scottish Hospital from the lower north grassed area

Moderate significance – views to the roof of the Scottish Hospital from Cooper and Brown Street

Little significance – view to the eastern wings of the Scottish Hospital.

The design and location of the proposed new building forms retain these identified views which help to maintain the heritage value of the Scottish Hospital building, its setting, and its relationship with the wider context of the site.

8.1.8 Design Quality

The scale, form and location of any development on this site is informed by:

- it's relationship to surrounding development, heritage buildings and existing substantial and heritage vegetation on the site, and in particular to the existing streetscape;
- the existing and intended use of the site;
- the client's aspiration of accommodating all existing residents within the site during development and the intrinsic implications of this desire for the locations of the various components of the project.

Massing

From the earliest site analysis, it became clear that new development on the site should generally be located in the footprint of those existing buildings which have been earmarked for demolition thereby providing vistas to and from the heritage building which is to remain. The predominant height of the dense tree canopy provided reference as to scale and further governs the location of building, height and massing.

These determinants together with the location of Dillon Reserve translated into a building mass which achieve its greatest height below the tree canopy in the south-western portion of the land with stepping form to relate more closely to the dominant surrounding street scale at the edge of the public domain on the north.

The resulting design with its forecourt addressing the heritage building and the private open space adjacent to Dillon Reserve maintains a visually grand parkland setting. The stepped massing and building footprint providing a sculpted and volumetrically articulated building mass.

Setbacks

The topography, substantial existing trees and the retained heritage building were major consideration in determining the setback of buildings which retain a park-like edge along Brown Street, street edge buildings on Cooper Street, and set backs on Stephen Street which are sufficient to support appropriate replacement vegetation, for the existing intrusive species, along the building alignment.

Whilst the Cooper Street alignment of the retained heritage building is unaltered, the setbacks where the existing theatre complex has been demolished are increased, and a courtyard introduced by the removal of intrusive elements, providing a much improved amenity through the introduction of landscape along the street alignment.

Public Domain

It was clear from the outset that the densely wooded northern portion of the land abutting Dillon Reserve should remain clear of development so as to enhance the opportunity of providing vistas from the reserve into the development and up to the heritage house and terraces. It was also clear that benefits would accrue from the population of the interface between private and public domains, and the proposal provides an activated frontage with opportunity for surveillance in this regard.

Entry to the site is maintained in its current location, but includes the demolition of existing adjacent service buildings with a resultant increase in visual permeability from all the adjacent surrounding streets.

Buildings along street frontages as previously described are largely screened by existing important and mature vegetation. The embankment along Brown Street presents an ideal opportunity to enhance the public domain through the introduction of appropriate palisade fencing, an entry ‘belfry’ terminating in a pocket park to providing pedestrian respite on what is currently a daunting climb.

The south-western corner of the site presented an ideal opportunity for the introduction of visually accessible open space and a corner park has been included. In addition to the obvious aesthetic enhancement provided by this feature, the open corner improves site distances for motorists exiting Cooper Street onto Brown street.

Building Articulation

The immediate surrounding development is characterised by stepping roof-scapes, the vertical proportion of terrace party walls, and a mixture of building form including pitch, flat, and lean to roofs of a varying materials.

The design approach has been to fragment the building form with stepped height, articulation in plan and the rhythmic repetition of vertical “party walls” with balconies spanning between them, mimicking the scale and form of terrace housing. The relationship of the buildings to the “piazza” entry which provides addresses for all buildings is confirmed by a stone foundation colonnade which echoes the reinstated terracing on site and the basements and retaining walls of the surrounding development.

Façades

The enclosing facades have been designed to give expression to the residential nature of the use of the buildings. Protected balconies, metal awning cover, landscaped roof terraces, punctured fenestration, all contribute to a diverse but related residential character which does not imitate the surrounding articulation but retains a strong relationship with it.

Use of Appropriate Colours

The colour palette has been carefully selected to provide a muted building which recedes into its vegetated setting and providing a structure which mitigates the effects of weathering, colour staining and leaching inherent in a heavily treed environment.

Materials and Finishes

Natural materials and integrally coloured elements form the basis for the choice of building fabric with a colour palette which will remain fresh despite the challenges posed on this particular site of weathering and colour staining.

An appropriate mix of contemporary boarding and metal sheeting imparts a residential character without mimicking the terrace housing.

Landscaping

Landscaping consists of a mix of contemporary but complementary planting, a reinstatement of the existing terraced nature of the heritage curtilage, extension of the treatment of Dillon Reserve and a complementary under storey to the substantial vegetation on the western embankment. It incorporates the design of functional spaces for use by the varying categories of residential users.

8.1.9 Assessment against CPTED principles

Crime prevention through environmental design (CPTED) seeks to influence the design of buildings and places by:

- increasing the perception of risk to criminals by increasing the possibility of detection, challenge and capture.
- increasing the effort required to commit crime by increasing the time, energy or resources which need to be expended.
- reducing the potential rewards of crime by minimising, removing or concealing 'crime benefits'.
- removing conditions that create confusion about required norms of behaviour.

The DUAP Publication *'Crime prevention and the assessment of development applications'* sets out four main principles to guide the design of new developments to minimise the risk of crime. These principles are addressed in turn below:

Surveillance

Good levels of surveillance are provided from the proposed residences to all street frontages, as well as over internal communal open space areas. Whilst the buildings are set back from Brown Street, living areas and balconies are oriented towards the street to ensure passive surveillance of this public domain area which is currently not well surveilled from this site.

Internally, good levels of lighting will be provided along walkways and at building entrances to identify these spaces.

All landscaping design has responded to CPTED principles through the use of planting that promotes clear lines of sight across open space areas.

The location of pedestrian paths and outdoor seating at the main site pick-up/drop-off area will promote activity within this space and encourage residents to gather, encouraging activity and passive surveillance of the building entries.

Further, visual connection will be maintained between the site and Dillon Reserve to the north. The increased use of the Scottish Hospital site will improve casual surveillance over this public open space and increase the perception of safety.

Access Control

Site security and access control is a high priority for Presbyterian Aged Care in the ongoing management of each of their seniors living properties. Due to the frail nature of residents, this site will incorporate full security access for vehicles and pedestrians from the Brown Street access points to control who enters the property. In addition, security access will be provided to the entrance of each of the buildings, and also to the basement car parking.

Within the site, the use of paving materials, planting and fencing will help to direct pedestrians around the site and to delineate areas for visitors, residents, pedestrians and vehicles.

Territorial Reinforcement

Open space on the site has been designed to appear as part of the overall development and not as publicly accessible land. Ground floor areas are generally to be used as common open space, except for terraced areas off the aged day care and meeting rooms in the Stephen Street ILU building. Pedestrian and vehicular access paths around the central drop-off area will be delineated by paving types to distinguish the shared zone from the pedestrian-only zone. The entrance threshold to the Brown Street ILU building falls within a colonnade, physically identifying the semi-private nature of that building entrance.

Private open space for individual dwellings is located above ground floor level, so is physically separated from all other communal spaces.

Space Management

The site will remain in the ownership and care of the Presbyterian Church. Ongoing site maintenance will be co-ordinated by site management to ensure the general upkeep of landscape and other common space along with community facilities.

8.2 Heritage

The heritage significance of the site has informed the design of the proposal from the outset. This section addresses how the heritage significance of the site and its components will be responded to and conserved by the proposed scheme.

8.2.1 Conservation Management Plan

A Conservation Management Plan was prepared for the Scottish Hospital site in June 2006 by NBRS+Partners, and was updated in November 2010 to inform the proposed redevelopment of this site. The CMP accompanies the Project Application EA Report (November 2010) at **Appendix I**.

In accordance with the methodology outlined in “The Conservation Plan” by Dr James Semple Kerr, the significance of various component elements of the place have been assessed against identified historical themes and ranked for the purpose of enabling decisions on the future conservation and development of the place to be based on an understanding of its significance. These assessments were made without regard to the practical considerations and must subsequently be taken into account when formulating policies. Components are grouped into groups incorporating ‘Exceptional’, ‘High’, ‘Moderate’, ‘Little’ or ‘Intrusive’ conservation value.

Some of the elements identified have been fully degraded by adaptation, and require restoration or reconstruction to recover their full significance. The categories should be read in the context of the overall cultural significance of the Scottish Hospital.

Exceptional Significance

Fabric in this category includes

- Sandstone masonry walls
- Roof framing and floor structure comprising timber elements with an adzed finish
- Joinery dating from c1848, including windows, doors, skirtings
- Glass window panes c1848

Spaces in this category include

- Existing ground floor spaces GF.1, GF,2, GF.3, GF.4 , GF.5
- Existing first floor spaces FF.1, FF.2, FF.3, FF.4, FF.5

Views and vistas in this category include

- The view to The Scottish Hospital from the northern grassed terrace

High Significance

Fabric in this category includes

- Brick masonry walls
- Pebble dash render and 3 coat plaster finishes
- Chimney pieces
- Roof form and framing structure, slate tiles, terra cotta accessories, eaves linings, waves brackets
- Joinery dating from 1901 and 1936, including windows, doors, skirtings, stairs
- Main entrance door, including sidelight, fanlight, leadlight panels
- Original hardware on doors and windows
- Early light fittings
- Stone stairs in garden
- Trees nominated on the Register of Significant Trees held by Woollahra Council.

Spaces in this category include

- Existing ground floor spaces GF.12, GF.13, GF.5a, GF.10, GF.18a, GF.18b, GL.19b, GF.6, GF.7, Western verandah
- Existing first floor spaces FF.12, FF.13, FF.5a, FF.10, FF.16a, FF.61b, FF.20a, FF.20b, FF.6, FF.7, FF.41, FF.43, Western balcony

Views and vistas in this category are

- Partial views to and from the Scottish Hospital from the lower north grassed area
- Views to the mature trees, garden stairs, lawn terrace from The Scottish Hospital
- Views of The Scottish Hospital from Cooper Street

Moderate Significance

Fabric in this category includes

- Terra cotta roof on southern wing
- Tiled floor finish of northern verandah floor

Spaces in this category include

- Private rooms c1936
- Timber verandah and balcony on western façade

Views and vistas in this category include

- Views to the roof of The Scottish Hospital from Cooper Street and Brown Street

Little Significance

Fabric in this category includes

- Stud walls on the northern side of the eastern entry door

- Recent modifications to the bathrooms
- Alterations carried out in the mid 1970s to bring the building into compliance with the building code

Spaces in this category include

- The wing completed in 1985
- Compromised spaces on the southern side of the ground floor

Views and vistas in this category include

- View to the eastern wings of The Scottish Hospital

Intrusive

Fabric in this category includes

- The detached wing, accommodating the nursing home, completed in 1977
- Fluorescent lighting
- Hollow core doors
- Later window sashes in bay windows

Spaces in this category include

- Out buildings to the east of The Scottish Hospital

The CMP goes on to provide recommendations for the ongoing use of the site, including general guidelines for the care, use and management of the building, and recommendations for specific conservation works.

The Heritage Impact Statement prepared by NBRS+Partners confirms that the design of the proposal has taken into consideration the recommendations of the Conservation Management Plan.

8.2.2 Archaeological impact

An assessment of archaeological impact was undertaken by Casey & Lowe Pty Ltd, and accompanies the Project Application EA Report (November 2010) at **Appendix V**. This report specifically addresses the proposed impact of the development on the archaeological remains at the Scottish Hospital Site resulting from excavation associated with the basement car park and re-landscaping of the present grounds.

The level of heritage significance of the archaeological items is described in the Statement of Heritage Significance for the site. Those relevant sections state that:

- *The archaeological remains within the study area have a medium level of historic and archaeological significance and research potential. Most of the remains of the historic terraces have been modified or are buried. The upper section of the pathway along the eastern site of the garden is relatively intact but the lower section has been lost or buried.*
- *Remains of the nineteenth-century garden are likely to be unique within the local area and part of a rare resource generally.*
- *The archaeological remains have a level of heritage significance at Local level.*

The report states that the proposed development will impact on the sections of the site previously occupied by the terraced garden. The section of exposed pathway is reasonably intact and includes large sandstone stair treads as well as concreted path sections. The site of the 1880s house off Stephen Street is regarded as having little archaeological potential due to its later nineteenth-century date.

The following impacts are identified as likely to occur, and should be mitigated as follows.

Table 9 – Impact and Mitigation to Archaeologically Significant Items

Item	Impact	Mitigation
Pathway adjacent to terraces on eastern side of garden	It is proposed that the pathway be shifted sideways to the west. This will involve removing and relaying all existing stonework.	The pathway will be re-laid in its original configuration, which will reinstate the steps at the existing southern and northern ends which have been altered. The concrete sections should be re-laid using pebble aggregate, to replicate the original finish, with sandstone edging.
Upper terracing	The landscaping of the area below the historic house will impact the earlier terraces, most of which have been buried or modified.	A portion of the upper terracing should be archaeologically excavated and recorded prior to the civil works commencing.
Lower terracing	The basement excavation will remove all remains of the terraced garden currently buried under the carpark and adjacent areas.	A section of the carpark below the line of the pathway should be excavated and the pathway and its adjacent terraces recorded.

The report recommends that a s.140 approval under the NSW Heritage Act 1977 be obtained from the Heritage Council of NSW to permit the archaeological excavation and recording of at least two areas of the garden, including the area of the present carpark below the pathway, and the removal and reinstatement of the pathway. The permit application should be accompanied by the Archaeological statement and the 2001 results of testing, as well as a research design to guide the proposed archaeological investigation.

These recommendations are incorporated into the Draft Statement of Commitments accompanying this application.

8.2.3 Landscape Heritage Impact

A Landscape Heritage Impact Assessment has been prepared by Musecape Pty Ltd as an input to the Heritage Impact Statement prepared in light of the proposed development. That report accompanies The Project Application EA Report (November 2010) at **Appendix H**.

> *The report concludes that the Scottish Hospital site has exceptional and high cultural landscape heritage significance at a local level, derived from its historical, associational, aesthetic, social, technical/educational and rarity values. The proposed development will result in considerable changes to the landscape but these are considered to be within the limits of acceptable change. The proposal provides for the sympathetic adaptive reuse of "The Terraces", ensuring its conservation as a significant item of built heritage. The proposal also provides for retention and enhancement of the most significant soft landscape elements and for the retention and interpretation of the terraces slope to the north of the historic building. The proposal also provides for new landscaping that will be in keeping with the historic plantings on site and will also enhance the setting for residents, neighbours and passers by.*

Subject to the implementation of the mitigative measures recommended in the report, there are not considered to be any heritage landscape impacts that would warrant refusal of the application.

Table 10 – Landscape Heritage Recommendations

Category	Recommendation
Trees and other soft landscaping	Comply with any tree management requirements of Woollahra Council, particularly in regard to those trees listed on Council's Register of Significant Trees.
	Replace any trees assessed as Category A or B in the Tree Wise Men Australia Pty Ltd report and that are proposed for removal with the same species propagated from the original or with similar species to maintain landscape character.
	Replace any trees assessed as Category C or D in the Tree Wise Men Australia Pty Ltd report that are proposed for removal with a like number of trees of appropriate species to maintain/enhance landscape character.
	Transplant on site if possible any trees identified as 'transplantable' in the Tree Wise Men Australia Pty Ltd report.
	Commission a suitably qualified and experienced arborist to carry out remedial tree surgery to those trees identified in the Tree Wise Men Australia Pty Ltd report as being of A or B retention value and to be retained in the landscaping scheme.
	Prepare a Tree Management Plan for the site that provides for regular aboricultual monitoring and a tree maintenance designed to minimise public safety risks and extend the safe and useful life expectancy of significant planting.
	Protect significant trees and other landscape elements during preliminary earthworks and construction works on site by protective measures as recommended by the arboricultual industry and to comply with the requirements of Woollahra Council.
	Carry out selective pruning of those trees to be retained to improve their shape and condition and to enhance solar access to 'The Terraces' and any new buildings, subject to approval by Woollahra Council. Pruning of significant trees should conform to relevant Australian standards (eg AS 4373 Formative Pruning) and current best practice in arboriculture as recommended by relevant industry representative groups.
Future Landscaping	Any future landscape works to be carried out strictly in accordance with the conservation policies contained in the CMP.
	All future landscape construction or maintenance works undertaken on the subject site should be carried out by suitably qualified and experienced tradespeople. Reference should be made to the Heritage Branch list of qualified tradespersons for each trade – refer to Heritage Branch website.
	Final selection of new plant material should take into account height and canopy spread at maturity so that significant views to, from and within the site, enhance views, not block or detract from them.
	New landscaping should be subject to a Maintenance Schedule that complies with Woollahra Council requirements and provides for the maintenance of new plant material during establishment.
	It is recommended that the following water saving strategies be implemented for new and existing planting: ▪ De-compaction of garden beds to encourage greater moisture penetration; ▪ Treatment of garden beds with soil-wetting agents; ▪ Mulching of garden beds with appropriate moisture-retaining materials to retain moisture and suppress weed growth; ▪ New plantings should not include species with high water requirements unless these are essential to conservation of the original design intent.

Category	Recommendation
Hard Landscaping	Any damaged significant hard landscape fabric should be repaired by suitably skilled and / or qualified tradespersons, with materials used for repairs or reconstruction preferably being traditional materials already used in the construction of the landscape (eg sandstone).
Weeds, Feral Animals and Native Fauna	Weeds and problem species including self-sown woody species should be controlled and/or removed under a staged control program, using well-established methods including manual removal and targeted use of approved herbicides, in collaboration with Woollahra Council, adjoining landholders and other relevant authorities/organisations.
	The presence of any feral animals such as rats, mice, foxes, feral cats, feral dogs or native animals such as possums or grey-headed flying foxes should be monitored, and any adverse impacts on significant items and areas, vegetation and wildlife recorded, with appropriate control measures implemented in consultation with relevant authorities.
Introduction to New Services	Services and utilities such as water supply, drainage, power, phone and internet cabling for the new development should be provided in a manner which poses minimal environmental impact on the historic fabric or aesthetic qualities of the landscape.
Site Housekeeping	Receptacles for no-site storage of rubbish, garden waste, landscape materials (eg mulch, compost) and building materials should be located in such a way that they do not detract from the aesthetic values of the original house and its landscape setting or significant trees on site.
	Care should be taken to ensure that sites are left in good condition after construction works. Contractors engaged in new construction or conservation work should be required to clean up and remove all surplus materials such as cement, adhesives, drop sheets, packaging materials from the site when they have completed their work.
Routine Maintenance	Routine maintenance actions should be carried out in accordance with the general and specific guidelines in the revised CMP. Appropriate maintenance procedures should be developed, documented and implemented to ensure the ongoing retention of the cultural significance of the Scottish Hospital site. A pro-active program of cyclical planned maintenance should be developed with records kept of all major repairs and maintenance to the significant landscape and built elements.
Archival Recording	Removal of any exceptional or highly significant fabric must be preceded by photographic archival recording in accordance with the Heritage Branch guidelines for such work.
Archaeological Requirements	The recommendations of the Casey & Lowe Archaeological Impact Assessment should be adopted, including the obtaining of any necessary archaeological excavation permits from the Heritage Council of NSW.
Site Interpretation	Prepare an Interpretation Plan for the Scottish Hospital site that complies with the policy and guidelines published by the Heritage Council of NSW and which effectively communicates the heritage significance of the place to residents and visitors alike, in ways that are accurate, entertaining and stimulating of further enquiry. The Interpretation Plan should recommend strategies, specific locations and media by which the heritage significance of the site can be communicated to current and potential future uses of the site in culturally appropriate ways that respect the heritage values of the place.

The above recommendations are included in the Draft Statement of Commitments at **section 9** of this report.

8.2.4 Heritage Impact Statement

A Heritage Impact Statement has been prepared by NBRS+Partners in respect to the site and proposed works, and accompanies the Project Application EA Report (November 2010) at **Appendix U**.

The report makes the following conclusions in respect to the heritage impact of the proposal on the site and its setting.

(a) Impact on the former Scottish Hospital building: Negligible

The strategy includes the adaptive reuse of the former Scottish Hospital, which is in keeping with the policies and recommendations of the Conservation management Plan prepared by NBRS+Partners (April 2006 and revised September 2010)

It is considered that the public would be able to view and appreciate the former Scottish Hospital following non-significant accretions and adaptation of the building to accommodate independent living units. Minor additions at roof level and basement level have been designed to minimise any visual impact on existing views to the building along Cooper Street and in views to the site generally. Changes to the fenestration along Cooper Street would match the proportions and details of original/early openings to minimise adverse impacts on the appearance of the former Scottish Hospital.

(b) Impact on the Scottish Hospital site generally: Acceptable

The proposed development has been designed to minimise the building footprint and to retain the significant trees within the boundary. Sections of the surviving terraced garden and early steps would be retained and adapted to suit access requirements for the new use, and where necessary, interpreted to visitors and residents through the new garden layout and signage. Potential archaeological deposits, including terraced walls would be excavated and recorded prior to their removal to enable construction of a new underground car park.

(c) Impact on the Paddington Conservation Area: Acceptable

Following discussions with the Paddington Society the new buildings would be set back from the street alignments to reduce their visual impact on the surrounding streets. The screen and row planting along Brown and Stephen Streets would be maintained, and glimpses into the site would be visible through the new palisade fence around the boundary.

Recommendation

NBRS+Partners recommend the heritage aspects of the proposal are acceptable for the following reasons:

- The scheme has been developed to minimise the footprint of new buildings within the boundary of the site
- The underground car park would involve the excavation of archaeological evidence of the extent of the garden terraces, but would minimise the footprint of vehicular circulation within the site
- The views of the residents of Stephen Street have been taken in to consideration and the new buildings would be set back seven meters from the Stephen Street boundary, and the Brown Street alignment generally.
- The new buildings would be stepped to reduce their visual impact on medium and long distance views to the site
- The significant trees would be retained and augmented with new trees and under-planting to maintain the garden character of the site.

8.3 Public Domain

It is considered that the proposed design relates well to the public domain surrounding the site.

The urban design analysis at **Appendix F** informed the placement of site entries, which are retained at the corner of Brown Street/Nield Avenue, and reinstated to Stephen Street which was possibly used to service the former theatre wing. To maximise pedestrian access to the site, further pedestrian entries are proposed from Brown Street to the Brown Street ILU, from the corner of Brown and Cooper Streets, and from Cooper Street to the RACF building. These entrance points address the grade change conditions of the site and help to maximise the points of interaction between the buildings and the public domain.

The proposed buildings address the street as far as is possible for this site. Whilst the Brown Street ILU building is set back from the boundary, dwellings are still oriented towards the street to provide passive surveillance over the public domain and provide a sense of address which is not currently enjoyed along this portion of Brown Street. A pedestrian bridge linking level 4 of this building to the street introduces a point for pedestrian activity where the building and its residents may interact with this street frontage.

Along Cooper Street, the Gatekeepers Lodge and heritage building directly address the street frontage. The Gatekeepers Lodge responds to the heritage building forms across the road, and is set back slightly from the site boundary enabling the strong built form line of the heritage building along Cooper Street to be interpreted. Dwellings within the Gatekeepers Lodge are oriented to the street.

The proposed community space at the corner of Brown Street and Cooper Street provides a space where people can gather, promoting an activation of this otherwise unused corner.

The RACF building is set back from the Cooper Street frontage but still addresses the public domain. A pedestrian entry is proposed from this section of Cooper Street. Along Stephen Street, the RACF forms a strong edge to the site in a similar manner to the strong terrace form further to the south. The design of the northern end of the RACF building has been amended as a result of replanning the internal floor layout, so as to appear more residential in appearance from the public domain. At levels 5 and 6, the location of the northern end bedrooms and living area have been swapped, which enables presentation of a domestic appearing living room and balcony to the street. The materials used are more recessive in nature.

Towards Dillon Reserve, buildings are lower in scale.

The landscaped open space at the north of the site will be retained and improved through a detailed landscape scheme which will complement the public open space at Dillon Reserve and maintain the feeling of space currently enjoyed from that public park.

Fencing around the site is proposed in an open palisade style, enabling visual connection between the site and the public domain whilst respecting the private tenure of the site and the need to ensure security for residents.

As is detailed at **sections 5.1.10 and 8.14** of this report, a proposal has been put to Woollahra Council regarding the possible dedication of open space from the north of the site to form an extension to Dillon Reserve. A possible design solution has been prepared by Aspect Studios demonstrating how the relationships between the subject site and the public open space may be configured if such a land dedication is agreed to. This indicative plan is included at **Appendix J**.

8.4 Environmental and Residential Amenity

8.4.1 Solar Access

The proposed residential buildings have been designed to ensure the majority of apartments receive a minimum of 3 hours solar access to living areas and private open space between 9am and 3pm at

midwinter. The orientation of the buildings themselves, the design of the apartments and layout of private open space areas ensures that there is significant access to sunlight penetration.

In the assessment of solar access, the significant treed cover of the site has been taken into account. In accordance with the recently revised Land and Environment Court Planning Principle for solar access, the following parameters informed the solar access assessment;

> *Overshadowing by fences, roof overhangs and changes in level should be taken into consideration. Overshadowing by vegetation should be ignored, except that vegetation may be taken into account in a qualitative way, in particular dense hedges that appear like a solid fence.*

In this light, the updated solar analysis report prepared by Steve King (**Appendix Q** to the Project Application EA Report – November 2010, and the addendum report accompanying this PPR EA) certifies that at least 73% of all dwellings receive adequate solar access at midwinter, meeting the requirements of the Residential Flat Design Code. This is addressed in more detail at **section 7.3.7** of this report.

Communal private open space on the site will receive adequate solar access for enjoyment by residents.

The proposed development does not cause any significant overshadowing to private open space or living areas of adjacent properties such that it would reduce solar access to those spaces to below 3 hours at midwinter. This is demonstrated in the shadow analysis prepared by JPRA Architects at **Appendix B** to this EA.

8.4.2 Acoustic Privacy

The orientation and internal layout of apartments has been designed to maximise acoustic privacy between dwellings.

Private open space balconies are separated by solid screen walls to reduce incidence for overlooking from one to another. The layout of the apartments is such that bedrooms and living areas of neighbouring dwellings are separated to reduce disturbance from conflicting activities. The construction of the building itself will meet the requirements of relevant acoustic standards.

Communal facilities are located on separate levels than the residential dwellings to remove opportunities for noise disturbance between the uses on the site.

The air conditioning condenser units fronting Stephen Street have been lowered into the ground, and are proposed to be screened with a louvred enclosure. All plant will meet acoustic criteria required by relevant Australian Standards.

It is considered that the use of the site and design of the dwellings will minimise opportunities for acoustic disturbance to residents.

8.4.3 Visual Privacy

The location of buildings and the orientation and layout of apartments has been designed to maximise visual privacy between dwellings and communal open space on the site.

Screening between residential balconies will prevent overlooking from one apartment to another, whilst the relative location of dwellings has ensured that the outlook from individual dwellings do not look directly into the living rooms or bedrooms of other dwellings.

Where buildings are located in relative proximity to each other, balconies have been situated on opposing orientations to prevent direct overlooking and maximise the relative distance between these spaces.

The majority of apartments are located above ground level, providing a grade separation between ground level communal open space and private balconies or windows to living areas. This minimises opportunities for overlooking from the communal spaces to the private residences. The Brown Street

ILU building is also set well back from the site's western frontage, with significant planting between the street and the building, maximising privacy to westerly oriented dwellings within this building.

The Gatekeepers lodge building is set back from Cooper Street. The dwelling on level 5 (street level) is oriented to the north, with utility areas facing the street to maximise privacy from the public domain to this apartment's living spaces. The upper level apartment is provided with an orientation to the street, but private balcony to the north.

The assessment of the scheme against the visual privacy requirements of SEPP 65 at **section 7.3.7** of this report has demonstrated that the design and layout of the dwellings minimise opportunities for overlooking between dwellings within the site, and achieves a good level of residential privacy for future residents.

Opportunities for overlooking to neighbouring properties from the proposed development have been minimised through the following design elements:

- Locating new dwellings within the heritage building to the north, with windows in the southern (Cooper Street) façade of this building servicing utility areas only at the ground and first floor. The upper floor apartments will have small windows overlooking Cooper Street from secondary rooms. The building separation from dwellings across Cooper Street, and the location of their windows and private open spaces, ensures that there will be minimal impact on privacy to residents on the southern side of Cooper Street.
- The Stephen Street RACF / Stephen Street ILU building has been designed to step away from the site's eastern boundary to maximise the setback from the street and dwellings across the road. The building is a minimum of 17.4m from the nearest residential flat building (40 Stephen Street) at the nearest point. Whilst SEPP 65 separation distances do not strictly apply to class 9c buildings, nor to residential flat buildings across a public street from one another, it demonstrates that the building separation proposed is just shy of that which would apply to the habitable rooms/ balconies of proximate residential flat buildings on the same site, or on the same side of the road, being 18m.

  This building will be used as a Residential Aged Care Facility, occupied by frail residents. Whilst the residents will occupy their rooms which are oriented towards Stephen Street, it is considered that the nature of the use will not result in adverse overlooking impacts to residents across Stephen Street.

  The larger ILU apartments at the upper level have been designed and oriented away from Stephen Street, with living areas oriented to the north and south. Only one smaller apartment on this level is oriented towards Stephen Street. The ILU apartments are located across the road from 38 Stephen Street and will not overlook directly into the neighbouring apartments within a building that is 3 storeys in height.

  The tall Residential Flat Building at 40 Stephen Street is located across the road from the northern portion of the RACF building which will be occupied by high care residents. It is considered that the overlooking impacts between 40 Stephen Street and the RACF building will be minimal.
- Living areas and primary balconies for dwellings within the Stephen Street ILU building are oriented to the north and away from the Stephen Street frontage. It is considered that there will be minimal privacy impacts to the dwellings within the shorter three storey building on the corner of Stephen and Glen Streets, especially as those dwellings are oriented to Glen Street and away from the subject site.
- The Brown Street ILU building has been set back a significant distance from the site boundary, and will be a minimum 20m from the building line of the closest dwellings on the western side of Brown Street. The building separation between the existing and new dwellings is considered to be sufficient to ameliorate any significant overlooking impacts that may result. It is noted that the uppermost story of this building has been removed, further ameliorating any perceived privacy impact. It is noted that the significant number of trees located on the site in the vicinity of the western boundary will further obscure opportunities for overlooking between the buildings.

8.4.4 Design for Access

The proposed ILU dwellings and Residential Aged Care Facility, as well as the communal open space surrounding these buildings has been designed to provide equitable access for residents and visitors. An accessibility report has been prepared by Mark Relf Accessibility Consulting, which accompanies the Project Application EA report (November 2010) at **Appendix K**. This report concludes that

The proposed development complies with the accessibility and adaptability requirements of the State Environmental Planning Policy – Housing for Seniors or People with a Disability (Amdt no. 3 – 2008) in the following manner:

- *The development is appropriate located being 290 metres to public bus transport route 389 and will provide accessible pedestrian footpath access from the site along Glenview Street, Liverpool Street and MacDonald Street, subject to several minor infrastructure upgrades to comply with clauses 26(2)(b), 26(3), 2694), 26(5) and 38(a); and*
- *Bus route 389 which travels to several large regional shopping centres provides at least 40 trips a day Monday to Friday during daylight hours in accordance with clauses 26(1), 26(2)(b), 26(3), 26(4); and*
- *A review of Bondi, Bondi Junction, Woollahra, City shopping centres and surrounding illustrates an appropriate range of retail, commercial and recreational services that includes banking, medical centres, supermarket, numerous variety stores/services and recreational facilities to comply with clauses 2691) and 26(5) suitable for this type of development.*
- *The development demonstrates compliance with the minimum requirements of visitability by virtue of 100% of the 82 self contained dwellings that will have wheelchair accessible pathways from an adjoining road or internal road as required by schedule 3 clause 2(1) and the accessibility requirements of the Seniors Living Urban Design Guideline as referenced by Clause 31; and*
- *Accessibility of the 82 self-contained dwellings (100%) and compliance with the design standards of schedule 3; and*
- *Accessibility of the 100 bed residential age care facility and compliance with the accessibility requirements of Parts D3, E3.6, F2.4 of the BCA to satisfy division 2 of the Housing for Seniors policy; and*
- *Provision of communal amenities that will be wheelchair accessible and benefit the lifestyle of future residents also demonstrate compliance with AS1428 and clauses 38(b), schedule 3 clause 2(3); and*
- *Provision of well designed parking for residents and visitors in accordance with schedule 3 clause 5, clause 50(h) and 38(b).*

8.4.5 Landscaping and Open Space

Arboricultural Assessment

An arboricultural assessment was undertaken in respect to the site by Tree Wise Men to inform the trees to be retained on the site. This report is included at **Appendix G** to the Project Application EA Report (November 2010). The report includes a Tree Schedule of the existing trees on the site, a Tree Protection Plan, and a number of recommendations for the protection of the retained trees during construction.

The report concludes that:

- Of the 144 assessed trees, 51 can be retained. All the heritage listed trees (trees 6, 18, 81, 100, 105, 119 and 122) are to be retained. 15 of the 17 'Retention Value A' trees are to be retained. 29 of the 62 'Retention value B' trees are to be retained.

- Of the 51 retained trees, 31 have been rated as R+ meaning a level of encroachment is proposed within the Tree Protection Zone. 20 trees are rated as R meaning no TPZ encroachment is proposed. The R+ trees will require specific tree protection and monitoring during construction.
- A number of tree protection requirements for the R+ trees are outlined within the report and will need to be implemented during construction to facilitate the long term survival of those trees.
- 5 palms (Trees 47, 86, 110, 128 and 129) which are located within proposed construction zones are to be transplanted to alternate locations within the site. The landscaping zone fronting Stephen Street would be a suitable location. No Canary Island Date Palms are proposed to be transplanted given their propensity to spread as weeds. Temporary off-site storage and maintenance may be required given construction constraints.
- Of the 144 assessed trees, 88 are recommended for removal.
- Of these 88 trees, 3 were of 'Retention Value D' (dead, dying or dangerous), 71 were within construction zones and 14 whilst clear of construction, were weed species and are to be removed and replanted with more appropriate species.

Further, the report comments on various aspects of the proposed scheme as follows:

- Hydraulics services drawings N10926-DA-H00/01 – DA-H03/01, prepared by Cardno ITS have been reviewed. Further arboriculture assessment will be required for construction drawings. The 'catch drain' indicated in the south west corner of the site may need to be amended to a dish drain to minimise TPZ encroachments. All machine trenching must be prohibited within the SRZ offsets of retained trees to facilitate their retention. The drainage design must minimise TPZ encroachments wherever possible.
- Landscape plans 10034, Sk01-Sk07, Rev.01 prepared by Aspect Studios have been reviewed. The proposed landscaping adjacent to the retained trees aims to maintain existing soil levels, moisture and nutrient status within the TPZ. The Landscape Plans for construction should incorporate relevant tree protection measures listed above to minimise tree impacts.

The recommended tree protection requirements are included in the Draft Statement of Commitments at **section 9** of this report.

Rationale for Allocation of Open Space for Seniors Use in Accordance with SEPP Seniors

SEPP Seniors requires the allocation of landscaped open space to the RACF facility at a rate of 25m^2 per bed, in addition to requiring that 30% of the site area for the ILUs also be landscaped area.

For the purpose of determining compliance with these minimum requirements, the following methodology was used.

The proportion of GFA allocated to each use (RACF and ILU) was determined as a proportion of the overall GFA of the scheme.

- RACF GFA = 6,795.5m^2, equivalent to 36% of the overall GFA
- ILU GFA = 12,152.7m^2, equivalent to 64% of the overall GFA.

The total site area is then split to allocate a proportional 'site area' to each of the two uses.

- 36% of the 14,780 site area = 5,320m^2 for the RACF.
- 64% of the 14,780 site area = 9,460m^2 for the ILU.

The minimum amount of landscaped area required is then determined as follows:

- 30% of the 9,460m^2 ILU site area = 2,838m^2 landscaped area required.
- 25m^2 per RACF bed = 2,500m^2 landscaped area required.

The minimum overall landscaped area is therefore 5,338m^2. A total of 8,147.47m^2 is provided.

The minimum landscape area requirements are also met for site servicing Option B.

Landscape Design Proposal Assessment

An updated landscape statement and plan has been prepared by Aspect Landscape Architects which accompanies this report at **Appendix J**. The report details the approach taken to the landscape design for the site. The proposed development provides a total landscaped area of 8,147.47m^2 equivalent to 56.12% of the site area. Of this landscaped area, the total deep soil zone area is 7,211.04m^2, equivalent to 88.5% of the total landscaped area.

The majority of the landscaped open space will be available for use by all residents on the site. Various discrete areas have been designed in to the landscape providing interest for residents and a variety of experiences on the site.

- Private courtyards are screened from communal open space areas using traditional screen planting specimens to ensure privacy to these spaces.
- The traditional garden terracing is retained and reinstated to display the heritage garden species and define the primary use areas. Existing sandstone walls and concrete stairs are to be retained. The heritage sandstone stairs are to be reinstated.
- Dedicated pick-up /drop off area with planting and seating areas adjacent to a covered walkway linking the Brown Street ILU and Stephen Street RACF/ILU building.
- A link walk is provided in the centre of the shared vehicular/pedestrian zone, providing a safe pedestrian path from the upper to the lower gardens, at an accessible grade.
- A large section of the northern garden is dedicated as open lawn area which will receive direct sun access.
- A number of community garden plots are proposed along the existing site's northern boundary, for use by residents who wish to grow vegetables.
- Exercise and wandering areas are set amongst ornamental planting, exercise equipment and seating areas to the east of the main lawn area.
- A timber and gravel circuit path addresses the large existing trees and provides a link from the middle garden area to the boundary gate and adjoining Dillon Street Reserve park area.
- Along Stephen Street it is proposed to replace existing weed tree species with fast growing. Advanced native screen tree stock. Mature screen trees will be retained where appropriate. Trees along this frontage will be complemented with a native planted understorey.
- Existing ground levels towards the south of the site will be retained to protect the existing significant trees in this location.
- The existing steep banks to Brown Street are proposed to be extensively re-vegetated with low growing locally native species after removal of invasive herbaceous plans.
- Planted roof terraces to the Brown Street ILU provide for green outlooks from dwellings.
- A spa deck is proposed at the ground floor level adjacent to the community pool and gym, providing a summer respite area set amongst a large existing tree.
- Definition of the shared pedestrian and vehicular zone in the centre of the site through use of coloured paving.
- Dementia lawn and sensory gardens provided through direct access link from RACF building.

The design also incorporates the following Water Sensitive Urban Design elements:

- Harvesting and directional management of unutilised stormwater runoff into ground soak lines and planted swales for irrigation purposes.

- Increasing natural ground water availability to trees and plants for longer periods at more times.

Refer landscape plan 10034-SK-08 WSUD Opportunities at **Appendix J** to this report.

These will assist in the infiltration of rainwater into the water table below and minimise overland flow impacts to neighbouring properties.

The design of the proposed landscaped areas is considered to be highly appropriate for the intended residents on the site and users of these spaces. The variety of areas provided will cater for the differing recreational needs of the residents.

Landscape Treatment along Stephen Street Boundary

The proposed Option 3 for landscaping along the Stephen Street boundary, as detailed on plan ref SK 04 Rev B at **Appendix J** to this report is considered to best address privacy and vegetation screening along this frontage as it facilitates a more neutral transition and maintains greater foliage volume more consistently over time and incorporates other mature Palm stock transferred from the site.

As described in **section 5** of this report, the proponent would not, however, raise issue if the Department conditioning the landscaping along this frontage to be in accordance with Option 1 or Option 2 as presented on plan ref SK 02 Rev B or SK 03 Rev B at **Appendix J** to this PPR report.

8.4.6 View Loss from Surrounding Dwellings

During the community consultation undertaken, an offer was put to attendees to have a view impact assessment undertaken from their properties. A register of properties was taken, with 21 comprising the final list.

A digital 3D model of the locality was prepared, and the digital 3D model of the proposed scheme was inserted into the locality model. The entire model was geo-referenced for accuracy. Creation of the computer generated model attempted to most accurately reflect the level of vegetation that will be present on the site at the completion of the project. Existing trees were surveyed for height and breadth of canopy. New trees were shown in their proposed locations. Whilst every attempt has been made to reflect the future tree locations and sizes as accurately as possible, absolute accuracy cannot be guaranteed due to the possibility of natural changes to canopies throughout the life of trees.

A surveyor was then engaged to visit each property, along with the Project Manager from Cerno, to identify the most appropriate locations from where views towards the site are currently available. A GPS reference was recorded and RL measurement taken from each of these identified locations. Where the identified location was an entry point or footpath, the RL was taken at 1.5m above the ground level representing eye height. Where the identified location was from a window, the RL was taken at the midpoint of that window.

Depending on the aspect from each property towards the subject site, between 1 and 4 locations were recorded for use in the analysis.

Using the geo-referenced 3D model, the GPS reference and RL were entered and screen shots from the computer taken of the ‘existing’ and ‘proposed’ scenarios to demonstrate the difference between the two.

Each of these comparative screen shots were included at **Appendix W** to the Project Application EA report (November 2110).

Following redesign of elements of the scheme, an updated assessment has been prepared having regard to the amended design of the Brown Street ILU building and the Stephen Street RACF building. The updated assessment was prepared in respect to those properties affected by the proposed change in building height and configuration. These updated comparative screen shots are included in **Appendix W** to this PPR EA report. Each screen shot is location-referenced including property address, where the screen shot is taken (eg front door, window, footpath) and the RL at which the camera is placed.

From these comparative images, the following conclusions are drawn about view impact.

- It is not considered that any 'view' is being lost from properties surrounding the subject site. Whilst outlooks across the site may be altered or reduced, no impact will be had on any iconic view currently enjoyed from neighbouring properties.
- In the case of the current outlook enjoyed from residents at 40 Stephen Street in particular (and other Stephen Street residents in general), as the site is not zoned for open space there can not be a reasonable expectation to retain such an outlook into vegetated areas. The altered outlook onto the RACF building is not significantly different from the majority of outlooks experienced by residential dwellings in Paddington. This dense urban area is characterised by buildings constructed along the street edge, which is consistent with the approach to the street interface of this RACF building.
- When viewed from Cooper Street, the proposed RACF building is shown as being responsive to the scale of the lower portion of the heritage building. In some instances outlooks across the site are widened as a result of the positioning and design of the new buildings.
- When viewed from Brown Street, the proposed buildings are set back from the street edge and behind a substantially treed portion of the site which will be retained. As with the residents of Stephen Street, there can be no reasonable expectation to retain an outlook into a substantially vegetated site where that site is not zoned for open space. In this instance, the outlook over the site will change from a substantially undeveloped site to one which will contain buildings which respond to the site characteristics.
- The updated view impact analysis at **Appendix W** demonstrates that the height and relative impact of the Brown Street ILU building has been reduced from that shown as part of the Project Application EA scheme (November 2010).

Overall the view analysis presents an accurate representation of the proposed building locations and their relationship with existing dwellings. It is not considered that any dwelling for which view analysis modelling was undertaken will be affected by view loss as a result of the proposal.

8.4.7 Mitigation Measures

The following mitigation measures have been incorporated into the design scheme to minimise impacts on surrounding neighbours. These were informed by the Urban Design and Context Analysis at **Appendix F** , the community consultation sessions undertaken prior to finalisation of the design scheme, and submissions received during public notification of the Project Application.

- Locating buildings to preserve a substantial number of existing trees so as to retain the vegetated character of the site.
- Setting buildings back from the street edge as appropriate, whilst having regard to preservation of heritage and landscape elements on the site.
- Locating the taller buildings towards the southern end of the site which can take higher building forms without the resultant impacts on neighbouring buildings.
- Stepping the building form to reduce the perception of building bulk and remove long expanses of flat facades.
- Reducing the height of the Brown Street ILU building by one storey.
- Amending the design of the northern end of the Stephen Street ILU building to make it more residential in appearance.
- Introducing visual screening to the eastern façade of the Stephen Street RACF to ensure there are no overlooking impacts from this property into dwellings on the eastern side of Stephen Street.

- Constructing the air conditioning condenser units at the Stephen Street frontage below ground level, and enclosing them by a louvred screen to minimise visual and acoustic impacts on neighbouring dwellings (both on and adjacent to the site).
- Separating proposed buildings away from neighbouring dwellings in accordance with SEPP 65 principles.

8.4.8 Siting of Development

The siting of buildings on the property has had regard to the range of constraints presented by the site conditions. These are documented in the Urban Design Report at **Appendix F** and also on the Opportunities and Constraints diagrams within this report.

Further, to remove the need to relocate residents during the construction period, PAC requires that the existing residential care facility remain operational during this period.

To meet this requirement, the proposed RACF building needs to be constructed in a different location than the existing facility. The placement of the new RACF building has responded to the site constraints, especially the topography, heritage terraces and extent of vegetation. In addition, the operational needs and internal design requirements of such a facility needed to be accommodated to ensure its functionality for the intended purpose. Typically RACF facilities require a minimum number of beds per floor, to meet the required nursing staff ratios to patients. The footprint size of the proposed building has been absolutely minimised whilst still achieving the minimum occupancy per floor. The design was specially tweaked to reconfigure the building from its original and typical rectangular shape in order to enable the building to step back from the boundary and present an articulated façade to Stephen Street. Its proximity to a street frontage is also important to enable efficient access to the RACF by the various delivery vehicles servicing the facility.

8.5 Transport and Accessibility (Construction and Operational)

An updated Transport Assessment of the proposed scheme has been undertaken by Halcrow MWT, which accompanies this EA report at **Appendix L**.

The report addresses issues pertaining to site access, parking and internal traffic arrangements, traffic generation and its impact on the surrounding road system and intersections. It also addresses pedestrian and public transport access to the site.

An analysis of the existing and proposed likely levels of traffic generation were undertaken to determine the likely impact resulting on the surrounding road network.

When compared with the survey data, the forecast additional traffic generation of the proposal is:

- Morning peak hour – 17 vehicles per hour.
- Evening peak hour – 31 vehicles per hour.

The level of traffic generation is very low given the existing volume of 400 to 450 vehicles per hour passing the site on Brown Street and the fact that the generated traffic would spread in two directions on Brown Street and Nield Avenue.

The loading bay on Stephen Street would generate up to 13 visits per week depending on supplier contracts. Allowing for reduced visits on weekends, there would be around 7 or 8 visits per day. This would tend to be concentrated between about 8am and 4pm. Thus the loading bay would add about 2 or 3 vehicle movements per hour to Stephen Street.

The SIDRA Analysis undertaken of surrounding intersection operation confirms that the anticipated level of traffic generation would have a negligible impact on the operation of the two intersections (MacDonald Street-Brown Street and Lawson Street – Nield Street), which will continue to operate well at a Level of Service A.

All car parking on site is appropriately designed and located to cater for the anticipated user groups.

Having regard to the use of the site for Seniors living, and the hours of staff shift work, four bicycle parking spaces are to be provided on site.

Overall, the traffic assessment concluded that the proposed parking provision is satisfactory. The proposed use is a very benign one in terms of traffic generation, its traffic impacts would be low and overall traffic effects would also be satisfactory.

An assessment was also undertaken against the Option B site servicing scenario. The conclusions for the assessment of the preferred scheme hold true for Option B such as negligible impact on the surrounding road network and improved access to local bus stops. However, the following lists the key findings of the investigation that relate solely to the alternative scheme:

- In order to accommodate the loading dock on the upper basement level, Option B proposes a reduced parking provision of 126 parking spaces. This provision exceeds the requirements of SEPP Seniors and is therefore considered to be satisfactory;
- The improved principal vehicular access off Brown Street will also provide access for service vehicles;
- The loading dock under Option B will be located on the upper floor basement level. Analysis shows that all necessary truck manoeuvres can be accommodated within the loading dock;
- Stephen Street remains as it currently is in the alternative Option B scheme.

8.6 Ecologically Sustainable Development (ESD)

Cardno ITC has prepared a report detailing the Environmentally Sustainable Design initiatives for the proposed development, which are over and above the minimum requirements required by Section J of the BCA and Basix. This report is included at **Appendix X** to the Project Application EA Report (November 2010)

This ESD report confirms that the proposed design meets the relevant requirements of Part J of the BCA (for the RACF building) and BASIX (for the ILU buildings), being the required rating schemes for the proposed building types.

8.6.1 ESD Principles in Design and Operation

Greenhouse reduction for the building is achieved in an integrated approach including:

- Reducing the need for energy and water consumption through building fabric optimisations, passive solar design, demand reduction and energy and water efficiency.
- Optimising electricity, water and gas consumption by utilising waste products, renewable energy resources and rainwater harvesting.

Various passive design solutions and sustainability options for the building fabric were considered, including:

- Building fabric
- Thermal comfort
- Natural ventilation and air-change effectiveness
- Effective daylighting / natural daylighting
- Energy efficiency
- Water efficiency
- Material initiatives and waste minimisation

- Environmental management

Energy efficiency for lighting design and control strategies have been considered to reduce artificial lighting energy consumption and allow maximum advantage to be taken of natural lighting.

Variable Refrigerant Volume (VRV) systems will be utilised since they offer a high part-load efficiency, which translates into high seasonal energy efficiency. In comparison, the conventional HVAC systems typically spend most of the operating hours in the range of 40% to 80% maximum capacity.

The energy needed to meet the domestic hot water demand will be significantly reduced through utilising gas boosted Heat Pump systems.

Various environmental management initiatives will be considered, including:

- Energy sub-metering.
- Waste reduction management.
- Environmental management.
- Learning resources.

Consumption of potable water will be significantly reduced by utilising water efficient fixtures and equipment within the buildings. Collection and treatment of rainwater for the use of irrigation will further reduce the overall water consumption of the development.

8.6.2 ESD Principles in Construction

A detailed Construction Management Plan will be prepared to outline the proposed construction methodology for the project. This Construction Management Plan will address in detail the ESD principles to be incorporated. These will include, amongst others:

- On site sorting of recyclable materials and disposal off site at appropriate recycling centres;
- Minimising travel distances required for trucks to transport material off-site, where possible;
- Appropriate disposal of contaminated material, including contaminated soil and asbestos-containing building materials;
- Efficient use of water and power on the site during construction phase; and
- Reuse of appropriate material on site as part of the new construction works.

8.7 Threatened Species

A Fauna Assessment has been undertaken in respect of the site by Cumberland Ecology, which accompanies this EA at **Appendix Y** to the Project Application EA Report (November 2010).

The report is based on surveys undertaken on the site on 4 and 5 November 2009, and information contained within the DECCW Atlas of Wildlife, and the DEWHA EPBC Protected Matters Search Tool.

Surveys undertaken indicate the presence of a number of non-threatened or protected species on the site.

One threatened fauna species was found to occur within the subject site, the Grey-headed Flying-Fox (Pteropus poliocephalus), which is listed as vulnerable under both the EPBC Act and the TSC Act. This species is known to roost at the Royal Botanic Gardens approximately 1.5km to the north of the subject site, and individuals from this camp forage extensively throughout Sydney. It is likely that Grey-headed Flying-foxes recorded foraging within the subject site are from this camp. Development of the subject site is not considered to have an impact on this species because it will result in the removal of a negligible area of foraging habitat for the species.

The following mitigation measures are recommended to minimise the impact of the proposal on the species which inhabit the site.

- Pre-demolition removal of roofs

  It is recommended that steps be taken to allow potentially occurring microbats and other fauna to vacate the buildings where demolition or major reconstruction is required. This would include careful removal of the roof of the buildings to allow the species to escape during the following night. Removing the roofs of buildings would reduce the suitability of the derelict buildings as habitat for nocturnal species that use them as shelter during the day, and would discourage these animals from returning.

- Manual fauna removal

  Immediately prior to the commencement of development work, it is recommended that a fauna trapping program should be implemented to remove fauna that currently occupies the buildings destined for demolition or reconstruction. Trapping should continue for a one week period, with all trapped fauna being removed from the subject site. Native fauna should be relocated to a nominated site, and introduced species should be disposed of ethically.

  In addition to pre-demolition work, a trained ecologist/fauna handler should be on call during demolition to aid in the safe removal of any additional fauna still present within the building or to handle injured wildlife.

  If any animals are spotted trying to exit the buildings by demolition contractors, work should temporarily stop to allow the animal to reach a safe position.

These recommendations are included in the Statement of Commitments accompanying this application.

As part of the Fauna Assessment, a Seven Part Test was completed with respect to the Grey-headed Flying-fox. This test concluded that

Any proposed development on the subject site is not likely to have a significant impact on this species. No Species Impact Statement is required.

8.8 Drainage and Stormwater Management

Cardno ITC have prepared a Stormwater Management and Design Strategy for the proposed development, which is included in full at **Appendix R** to the Project Application EA Report (November 2010). In addition, Stormwater Plans are attached which demonstrate the proposed approach to managing stormwater on the site. These plans include an Erosion and Sedimentation Control Plan showing how this issue is to be managed during the construction phase.

8.8.1 Stormwater and Drainage Issues

Stormwater and drainage on the site will be addressed through the following mechanisms:

- Site Drainage and On-site Detention
- Rainwater re-use
- Water Quality

The following extracts from the Cardno Report describe the impact of these features.

Site Drainage and On Site Detention

The roof drainage system will be designed to cater for 20-year ARI storm event in general and 100-year ARI in the event of no overflow can be provided. The surface drainage system servicing the site will be designed to cater for 20-year ARI storm event with overland flow paths provided around the proposed buildings for storms in excess of the design storm. Five (5) minutes rainfall intensities

have been adopted for the calculation of the flows through the system. Refer to the IFD table included in Appendix 1 for rainfall intensity values.

The drainage system will be a combination of minor and major systems capable of conveying the flows to the discharge point. Council advised that On-Site Detention (OSD) will be required for the proposed development.

It is proposed to install an OSD tank to be located under the driveway and away from tree root systems. The shape of the tank will be configured as required to have minimal impact on the significant trees on site.

The tank will have a minimum volume of 233.4m^3. The discharge from the tank will be configured to have a low level outlet to control the minor storms in the form of a 450mm pipe. A high level outlet will be provided in the shape of a 2m wide spillway weir inside the tank to discharge large storm event flows in conjunction with the piped outlet.

Rainwater Re-Use

Rainwater collection and reuse provides water quality and water quantity improvements to the overall integrated stormwater management strategy. The roof runoff is collected into rainwater tanks for reuse around the site as detailed in the BASIX certificate.

Water Quality Control

To address the water quality requirements of WMC, the site's runoff will be treated prior to discharging into the receiving system. A treatment train approach will be used as follows:-

- *Roof runoff collection for reuse within the site. This will allow reduction of water quantity discharge from the site;*
- *Minimising the use of conventional pipe/pit drainage system by sloping paved areas into landscaped and pervious areas;*
- *Installation of rain gardens in private and common courtyards to collect runoff from paved surfaces where practical; and*
- *Installation of a silt/oil arrestor device prior to discharging into the Council's trunk main. The device will capture sediment and hydrocarbons generated from the car park and external flows runoff.*

8.8.2 Flooding Issues

The site is located in a catchment known to Council as having flooding issues upstream and downstream of the site. Council's Engineer advised that external overland flows from the upstream catchment could enter the site from Cooper Street.

The historical flooding data extracted from the flood study report for Rushcutters Bay catchment indicates that several incidents of flooding have occurred at the corner of Brown Street and Cooper Street. The flooding types are identified as localised floods only. The flood study report also indicates that overland flows could possibly overtop the kerb in Cooper Street and enter the site in large storm events if the flows are not conveyed by Brown Street quick enough.

The flooding strategy for the site will aim to protect the existing and the proposed buildings from external flows discharging on the western side of Cooper Street.

For the purpose of the Scottish Hospital development, the upstream catchment runoff will be completely diverted away from the site by providing a physical barrier at the south western boundary of the site off Cooper Street. In order to assess the volume and flows from the upstream catchment, part of the Rushcutters Bay "DRAINS" model was reproduced with the same data used for consistency.

The results of the model indicate that the pipe capacity is less than the 5-year ARI. This result is consistent with the findings of the Rushcutters Bay Catchment Flood Study. The detailed results of the

"DRAINS" model simulations for the 5-year ARI and the 100-year ARI are included in Appendix 4 to the Cardno ITC report at **Appendix R** to the Project Application EA Report (November 2010). It is proposed to construct a boundary wall on the southern side of The Scottish Hospital to prevent the flows from entering the site. The wall will have a minimum height of 540mm above the existing footpath levels.

8.8.3 WSUD

The extensive tree population covering the undeveloped portions of the site and the heritage listing on some of these trees renders these areas not suitable for WSUD features such as water quality ponds, open drains and bio-retention swales. The excavation of such measures would impact the tree root system, which would not be acceptable. Water quality improvements such as Water Sensitive Urban Design (WSUD) measures may be used (i.e. grassed swales and/or rain-gardens) subject to space availability and approval of the Consulting Arborist.

The design also incorporates the following Water Sensitive Urban Design elements:

- Harvesting and directional management of unutilised stormwater runoff into ground soak lines and planted swales for irrigation purposes.
- Increasing natural ground water availability to trees and plants for longer periods at more times.

Refer landscape plan 10034-SK-08 WSUD Opportunities at **Appendix J** to this report.

8.9 Contamination and Geotechnical Issues

8.9.1 Analysis of Risks/Hazards

A Hazardous Materials Survey was undertaken on the site by Hazmat Services. Their report on the findings is attached at **Appendix Z** to the Project Application EA Report – November 2010.

A hazardous materials survey of the existing Scottish Hospital Building was undertaken by Hazmat Services on Thursday 25th February 2010 to identify the presence of any hazardous materials.

The survey identified the following:

- Asbestos-containing materials
- Synthetic mineral fibre (SMF) materials
- Lead paint
- PCBs

The report contains a number of recommendations for the removal of these hazardous materials prior to the refurbishment or demolition of the building.

A number of studies have been undertaken to date regarding contamination within the site's fill, and in the location surrounding the fuel storage tanks in the south western corner of the site. A précis of these studies has been prepared by EIS, and accompanies this report at **Appendix T**, in addition to a summary contamination report prepared by EIS, dated 25 November 2010.

This summary report identifies that a number of measures must be undertaken prior to undertaking of this project. These include:

- Preparation of a Remedial Action Plan that incorporates the development details;
- Removal of the Above ground Storage Tank and incinerator followed by validation sampling;
- Waste classification sampling and preparation of waste classification letters;
- Installation of subsurface barrier and design of landscaping to minimise access to soil;

- Re-writing the Environmental Management Plan (EMP) to take account of the new development;
- Establishing an appropriate public notification of the EMP under section 149(2) of the Environmental Planning and Assessment Act 1979 or a covenant registered on the title to land under section 88B of the Conveyancing Act.

An Environmental Site Management Plan will be prepared to guide the appropriate identification, management and removal of potentially contaminated fill during excavation of the basements, so that any contaminated material is appropriately handled and disposed of off-site.

8.9.2 Geotechnical and Hydrogeological Analysis

A geotechnical and hydrogeological assessment of the site and proposed construction has been undertaken by Douglas Partners. It accompanies the Project Application EA report (November 2010) at **Appendix AA**.

The site is underlain by Hawkesbury Sandstone of Triassic age on the western boundary and south-west corner, with man-made fill over alluvial and estuarine deposits comprising mainly peaty quartz sand, silt and clay, covering the remainder of the site.

The proposed bulk excavation levels range from RL 105. – 13.0 and will generally encounter geological units 1 to 3 (filling, sands and weathered rock) with unit 4 (medium and high strength sandstone) possible intersected at the southern end of the site.

The site generally slopes towards the north east with discontinuous filling and overburden soil overlying Hawkesbury Sandstone. Groundwater was only recorded in borehole 1 at 7.3m depth (RL 8.3) and not observed in other boreholes.

Seepage should be expected from along the top of the rock surface and through joints and fractures in the sandstone particularly following periods of extended wet weather. Therefore, seepage levels are anticipated to be generally higher towards the southern side of the site where the rock is higher. Seepage should be readily controlled by perimeter drains to direct seepage around the excavation and building structures to the stormwater system. Subfloor drainage should be provided below the basement floor slab to assist drainage of the seepage.

It is anticipated that the permanent groundwater table will be deep within the Hawkesbury Sandstone or in the filling significantly below the site and that groundwater flow will be fracture controlled in the rock. It is anticipated that the proposed development on the site will have no significant influence on the existing groundwater flow system, both on the site and surrounding area.

This report identifies a number of construction measures to ensure stability of the site during construction of the proposed buildings. These include:

- Excavation methods
- Excavation support
- Foundations
- Seismic design
- Floor slabs

Detailed construction methodology will be determined post consent having regard to the site's geotechnical conditions.

8.10 Utilities

Cardno ITC has prepared a summary report of the existing and proposed utility services for the site. This report is attached at **Appendix P** to the Project Application EA Report (November 2010).

Electrical Services

It has been estimated that one 1000kVA kiosk substation will be required to service the site. The maximum demand of the site is 698A/ph.

The proposed location for the kiosk is along the Cooper Street frontage, so that it may connect into the Energy Australia High Voltage Feeder located on Cooper Street. A minimum area of 5.3m x 3.3m is required for the kiosk substation. The substation will be established on the Ground Level and will require direct road access. The existing kiosk substation will be decommissioned and a new substation installed.

Communication Services

From a project of this size it is assumed that 400 pairs will be required to the site to accommodate the communication demand of the future residents and staff.

ITC has undertaken a carrier survey investigation and has identified that there are Telstra, UECOMM and Optus services available locally. It appears that fibre optic infrastructure is also locally available, which is likely to be required by potential tenants within the proposed development.

ITC would suggest that co-ordination and negotiation would be required with the carriers to obtain adequate Telco services to the development, however from their experience there is limited risk associated with the provision of these services. This is to be formally confirmed with Telstra/Optus once the project proceeds to the design stage.

Water (Town Mains)

Water mains are located in Neild Ave, Brown & Cooper Streets, these mains are all 150mm in diameter. The water mains are all external and do not burden the site. The water meter serving the site is located on Neild Ave.

As the development has frontage to various 150mm water mains we anticipate that an upgrade of the authority water main will be unlikely. To confirm if amplification is required, an application to Sydney Water for a Section 73 Feasibility Notice can be undertaken, Sydney Water will respond to the application within four weeks.

An application for a water pressure enquiry can be submitted to Sydney Water to determine the performance of the water mains. This should be considered to confirm the availability of water for fire fighting purposes.

Gas

The development has frontage to an existing 32mm, 210kPa authority gas main in Cooper Street and an existing 50mm, 210kPa gas main in both Neild Ave and Brown St.

It is assumed that the various authority gas mains will be sufficient to serve the site.

Requirement for amplification works or headworks supply charges are not anticipated.

When approximate gas loads for the development are confirmed an application to the gas authority can be made to determine if headworks charges are applicable.

Sewerage and Sydney Water Stormwater Mains

The site is burdened with a sewer main located opposite to Glen Street (east boundary) and a stormwater main traversing the site from Stephen St down to Dillon St. All systems are gravitational.

The sewer line on site will likely be removed and disused so that building works can proceed without encumbrance. The authority stormwater main if possible should remain in position; the main appears to be clear of the proposed development building structures. The stormwater main will need to be surveyed in accordance with Sydney Water guidelines should new buildings be built in close proximity to the main.

It is assumed that whilst the existing sewer mains surrounding the site will be sufficient for connection, a new sewer connection to the infrastructure will be required to drain the lowest portion of the proposed development.

A requirement for amplification of the sewer mains is not anticipated.

8.11 Staging

A staged consent is not sought under this application; however it is proposed to stage the construction of the site to ensure a sensitive approach to transitioning existing residents from the current facility to the new facility. PAC has a requirement for the continuous occupation of the site by existing residents. This has informed the design approach for the placement of buildings and the likely construction staging of the project.

The intended construction staging is detailed below.

Stage 1

- Demolition of existing theatre building fronting Stephen Street, and non significant extensions to the heritage building.
- Construction of entrance driveway and part basements 1 and 2.
- Construction of Stephen Street ILU and RACF buildings.
- Adaptation of heritage buildings.
- Construction of Gatekeepers Lodge.

Stage 2

- Demolition of existing nursing home building along Brown Street.
- Completion of basements under proposed Brown Street ILU building.
- Construction of Brown Street ILU.
- Completion of at grade car parking and landscaping.

Construction will be managed to minimise impacts on the existing residents.

Cardno ITC has confirmed that the site has adequate servicing from utility providers to ensure the ongoing demands of the site can be met during the construction and ongoing occupation of the site by residents.

- Detailed staging plan.
- Relocation strategies for services.
- How existing operations will be affected by construction works.

8.12 Housing Choice

A range of housing types are proposed that will cater to a varying resident needs and affordability levels.

Independent Living Units

The market demand study prepared for the Presbyterian Church by Wallace McKinnon & Associates (refer **Appendix D** to the Project Application EA Report – November 2010), has informed the quantum and composition of accommodation on the site.

In respect to the demand for independent living units, the report found that there are significantly low vacancy rates within the existing retirement villages in the eastern suburbs (Waverley, Woollahra, Randwick and Sydney City LGAs). Forecast population growth figures for the over 70s age group are strong, with an increasing shortfall in available retirement village accommodation, even taking into account new facilities which are approved but yet to be developed.

The demand for quality of retirement village accommodation is also increasing, reducing the demand for older and smaller accommodation. In respect to dwelling sizes, the research found that there is a strong demand for larger 2 and 3 bedroom apartments. In this regard, with respect to the current proposal

> *the mix of apartments will be critical to both the initial success of the development and the long term operation. One bedroom apartments should be restricted to 5% to 10% of the total apartment numbers. The remainder should be a mix of 2 bedroom apartments (30% to 40%) with 2.5 and 3 bedroom places comprising the remainder. The critical 2, 2.5 and 3 bedroom apartments should comprise an overall area in the range of 95 to 140 square metres, all with 2 bathrooms.*

The proposed mix of ILUs has responded to this market demand, with a proposed composition as follows:

- 13 x one bedroom ILU apartments are proposed, comprising 16% of the overall total.
- 30 x 2 bedroom ILU apartments are proposed, comprising 38% of the overall total.
- 36 x 3 bedroom ILU apartments are proposed, comprising 46% of the overall total.

The dwelling sizes also correspond to the identified market demand.

Residential Aged Care Facility

The report found that there is an increasing demand for residential aged care places.

> *Population projections as detailed in the Stage 1 Report clearly demonstrate the need for a major increase in accommodation and care services for the aged in all four LGAs. This need is also supported by Woollahra, Sydney and Waverley Councils.*
>
> *The Woollahra Social and Cultural Plan 2008-2013 states that Woollahra is increasingly becoming a community of older people and there has been an increase in older people 80+, including some who may be frail aged and need additional care. These people are most likely to need residential aged care.*
>
> *A key outcome of the City of Sydney's The Next Generation – Blueprint for Aged Services and Facilities 2008–2018 Report is the need to advocate for extra facilities (hostel and independent self care units with 24 hour support and nursing home) in the City of Sydney.*
>
> *The Waverley Social Plan also states that the demand for residential aged care is likely to continue to outstrip the allocation of government funded aged care places.*
>
> *Key stakeholders consulted specifically highlighted their support for more high care in Waverley, Woollahra and Sydney LGAs.*

As a result of the ageing population and the restricted number of existing places the following situation has arisen:

- There is a considerable delay in being able to place people into both high and low care in the Woollahra and Sydney LGAs;
- The waiting period for high care in Woollahra LGA from the community is generally 6 months and around three weeks from leaving hospital;

- For low care in Woollahra LGA the waiting period from the community is generally 12 months and can take months from leaving hospital;
- The Department of Health & Ageing acknowledge that there is a lack of residential aged care facilities in the Sydney LGA due to the value and restricted availability of land in the areas; and
- Placements from hospital in the Randwick LGA and Waverley LGA are generally within days unless there are special requirements such as a CALD cluster/ethno specific facility or severe challenging behaviours. In saying this however people requiring low care generally have to wait longer than those requiring high care.

The proposed 100 RACF places, including 20 dementia care places, will significantly contribute to the demand for such accommodation in the locality. The proposed inclusion of 45% of places as 'concessional' places (where no accommodation bond is required) will ensure that high and low care beds will be more accessible to a broader segment of the local community.

It is considered that the proposed accommodation will respond to address some of the significant shortfall in aged care places in the eastern suburbs generally, and the Paddington locality specifically.

8.13 Residential Facilities

A number of facilities and services are proposed to be provided on site for the use of residents. The range of facilities has been nominated by PAC to respond to the anticipated needs of future residents, having regard to their extensive experience as aged care providers.

Within the Stephen Street building is

- Café/servery adjacent to the lift lobby area. There is potential for outdoor seating area to be provided near the drop-off area. This provides a meeting space for residents to socialise, or a place for visitors to meet residents without the need to enter individual apartments.
- Arcade tenancy space. It is intended that this space be used to accommodate visiting medical and health care staff on a temporary basis, or for services such as a hairdresser. This will enable residents to access various health and allied care practitioners, and other services, without having to leave the site, if they choose.

Within the Brown Street building is:

- Community room for use by residents for meetings, or for other activities which are inappropriate to be undertaken within a private residence but need a space for people to gather.
- Games room and reading library.
- Gym and pool/spa for the ongoing exercise and hydrotherapy requirements of residents.

Outdoor Space

- Communal recreational space and gardens are proposed to be located towards the northern end of the site, interfacing with Dillon Reserve. These gardens provide an expanse of outdoor space for the enjoyment and use of residents and their visitors. A variety of activities are catered for in the design of the outdoor space, including a communal vegetable garden, exercise equipment, bbq tables and discrete areas of varying landscape character.
- The Dementia care facility is provided with secure outdoor space including a 'dementia walk' through the adaptive re-use of the terraces to the north of the heritage building.

These facilities will be managed and maintained by the on-site management arranged by Presbyterian Aged Care.

It is considered that these facilities will provide an acceptable range of on site facilities and services to meet the immediate needs of residents.

8.14 Contributions / Voluntary Planning Agreement

The proposed development is subject to payment of a contribution to Council under s94 or s94A of the Environmental Planning and Assessment Act, to provide for the increased demand on Council services as a result of the increased number of residents.

Alternatively, a Voluntary Planning Agreement (VPA) under s93F of the Act may be reached between the proponent and Woollahra Council. Such a VPA may include a range of works not specified on any current Council works schedule. In addition, it may include an agreement to offset the costs of the works proposed against contributions otherwise payable under s94 or s94A of the Act.

Prior to lodging the Project Application in November 2010, a request was forwarded to Woollahra Council seeking that it enter into negotiations regarding a possible VPA. Draft contents and terms of a possible VPA were included in that correspondence, a copy of which accompanied the Project Application EA (November 2010) at **Appendix N**. The Draft VPA included:

Proposed contents of a Draft VPA:

- *The proponent dedicate to Council a portion of their land, immediately adjacent to Dillon Street Reserve, being a total area of approximately 1366.10m^2, to form an extension to Dillon Street Reserve.*
- *The proponent provide a footpath widening in Stephen Street, along the boundary of the subject site, for the purpose of construction of a public footpath.*
- *The proponent dedicate part of the subject site as public road for the purpose of construction of 8 public car parking spaces on that land, at 90^o to the footpath.*

It is proposed that the VPA be subject to the following terms:

- *The value of the land dedicated will offset any contributions payable to Council under s94 or s94A of the Environmental Planning & Assessment Act, 1979.*
- *The proponent will take responsibility for installing a new perimeter fence around the new expanded park and site.*
- *Woollahra Council will take responsibility (both financial and physical) for the footpath widening on Stephen St and introduction of 90 degree parking.*
- *Woollahra Council will take responsibility for the remodelling of the park.*
- *Woollahra Council will be transferred physical ownership of the land in question and hence will be liable for maintenance, liability and any capital works following transfer.*
- *The VPA must be agreed and documented by the end of September 2010.*

Subsequent correspondence confirmed an extension of this time to end of October 2010, with the intention that a Draft VPA, if agreed, be exhibited prior to completion of the Preferred Project Report for this scheme.

A plan was also forwarded to Council showing the possible boundary for a land dedication, area of car parking and footpath improvements along Stephen Street.

On 11 October 2010, Council resolved to enter into negotiations with the Presbyterian Church (NSW) Property Trust regarding a possible VPA. At the time of lodgement of this Preferred Project application, such negotiations have commenced, but no VPA had yet been drafted.

It is noted that section 93F (3A) states that:

> *A planning agreement cannot exclude the application of section 94 or 94A in respect of development unless the consent authority for the development or the Minister is a party to the agreement.*

As such, once an in-principle Draft VPA has been agreed, the Department of Planning / Minister for Planning will be approached concerning their role in the VPA.

The current VPA plan under discussion between Council and the proponent is included at **Appendix N** to this PPR EA report.

As it is unlikely that a Draft VPA will be finalised prior to the determination of this project application, the proponent requests that should the project be approved, a condition be placed on that consent requiring that the proponent either pay s94 or s94A Contributions to Woollahra Council or enter into a VPA with Woollahra Council in lieu of (or in addition to) s94payments, at the agreement of both parties.

VPA Option development comparison

The Draft VPA proposition put to Woollahra Council gives an indication of what might conceivably comprise a VPA for the site. This proposition included a land dedication to Woollahra Council totalling 1366.1m^2 in area. Whilst details of a potential land dedication are not finalised, the following table gives a breakdown of resultant areas and development statistics that would result.

Table 11 – VPA Option Comparison Table

Element	Current	VPA Option	Implications for Development Assessment
Total Site Area	14,780m^2	13,414m^2	SEPP Seniors and Woollahra LEP minimum site area ▪ Complies
Overall FSR	1.28:1	1.41:1	SEPP Seniors. 'cannot refuse' FSR standard of 1:1 and 0.5:1 ▪ Merits Assessment still required.
Total Landscaped Area	8,147.47m^2	6,781.37m^2	SEPP Seniors 'cannot refuse' landscaped area requirements ▪ Retains compliance
Deep Soil Area	7,211.04m^2	5,844.94m^2	SEPP Seniors 'cannot refuse' landscaped area requirements ▪ Proportion of landscaped area as deep soil zone reduces by 2.4%

An additional assessment of the implications of any draft VPA will be undertaken if and when any VPA option is agreed with Woollahra Council. This will also include an assessment of any public benefit arising from the potential VPA.

8.15 BCA

A report has been prepared by Steve Watson & Partners which accompanies the Project Application EA Report (November 2010) at **Appendix BB** and assesses the proposed design against the relevant Deemed to Satisfy (DtS) provisions of the Building Code of Australia. Whilst the majority of the design will comply with the DtS provisions, a number of fire engineered solutions are required to certain elements in order to comply with the BCA provisions. These are summarised below, and are also adopted into the Draft Statement of Commitments.

The assessment has revealed that the design is capable of achieving compliance with the provisions of the BCA subject to the resolution of the following key issues by a combination of "Alternative Solution" and "DtS" compliance:

1. *Separation between sprinklered RACF Building and non-sprinklered Building S in accordance with Specification E1.5 of the BCA;*

2. Protection of openings in external walls of Building's RACF and HB in accordance with Clause C3.4 of the BCA;

3. Extended travel distance to point of choice and exits (including between alternatives) throughout all buildings – Part D1 of the BCA;

4. Configuration of stairs required to be fire-isolated in accordance with Clause D1.3 of the BCA;

5. Discharge of fire-isolated stairs and protection of path of travel to road or open space in accordance with Clause D1.7 of the BCA;

6. Protection of external stairways in lieu of fire-isolated exits in accordance with Clause D1.8; and

7. Upgrade HB Building to address fire protection, structural capacity and Category 1 fire safety provisions to be appropriate to the new use:

a. Provision of a new fire hydrant system throughout complying with Clause E1.3 of the BCA and AS2419.1 – 2005;

b. Provision of a new automatic smoke detection and alarm system complying with Table E2.2a and Specification E2.2a throughout; and

c. Certification regarding the structural strength and load-bearing capacity of the existing building is appropriate for the new intended residential use in accordance with Clauses 143(1) & 143(3) of the Environmental Planning Assessment Regulation 2000.

These recommendations are incorporated into the Draft Statement of Commitments accompanying this application.

8.16 Consultation

A Communication Plan has been prepared by Urban Concepts on behalf of the proponent and the operators of the Scottish Hospital Site, Presbyterian Aged Care (PAC). The Plan, attached to the Project Application EA report (November 2010) at **Appendix C** was prepared to ensure a strategy and calendar for the staging of community consultation initiatives to facilitate resident and stakeholder understanding about the proposed aged care development during the design formulation and Environment Assessment process.

In this respect the Plan addresses the first stage in the communication process. Subsequent communication strategies would be designed to coincide with later stages of the project pending development approval.

The Communication Plan is presented in six sections. A summary of the information presented in each section is provided below:

- **The introduction** provides an overview of the proposal, its statutory approval process and specific consultation requirements defined for this project by the Director General of the NSW Department of Planning.
- **Communication Aims and Objectives** defines the underlying intent of the communication plan.
- **Communication Messages**. These are the key messages that the plan seeks to communicate about the project.
- **Target Audiences**. These are the people that the consultation plan seeks to address through its implementation.
- **Communications Methodology**. The strategy details:
  - The range of consultation activities that respond to each stage in the delivery process.
  - A Media Management Strategy.

- **Calendar of Events**. The consultation calendar presents a task list for the implementation of Stage 1 of the Communication Plan. It establishes milestone dates for when the communication initiatives will be held.

The consultation methodology presented in this plan has had full regard to the Major Project Community Consultation Guidelines October 2007 and therefore, it is considered that it fulfils their requirements in respect of this project.

The strategy outlined in the plan has been followed, and results of the community consultation detailed in the accompanying Community Consolation Report also accompanying the Project Application EA Report – November 2010at **Appendix C** and discussed in **section 2.3** of this EA.

Additional community consultation was also undertaken by the NSW Department of Planning as part of the public notification process for the Project Application. This is detailed in **section 2.4** of this EA report.

9 Draft Statement of Commitments

Having regard to the proposed development, the recommendations of various consultant reports and the environmental assessment, the following Draft Statement of Commitments has been compiled. It identifies works or activities that the proponent commits to undertake if the proposal is approved.

BCA compliance

- Separation between sprinklered RACF Building and non-sprinklered Stephen Street ILU in accordance with Specification E1.5 of the BCA;
- Protection of openings in external walls of Building's RACF and Heritage Building in accordance with Clause C3.4 of the BCA;
- Extended travel distance to point of choice and exits (including between alternatives) throughout all buildings – Part D1 of the BCA;
- Configuration of stairs required to be fire-isolated in accordance with Clause D1.3 of the BCA;
- Discharge of fire-isolated stairs and protection of path of travel to road or open space in accordance with Clause D1.7 of the BCA;
- Protection of external stairways in lieu of fire-isolated exits in accordance with Clause D1.8; and
- Upgrade Heritage Building to address fire protection, structural capacity and Category 1 fire safety provisions to be appropriate to the new use:
  - Provision of a new fire hydrant system throughout complying with Clause E1.3 of the BCA and AS2419.1 – 2005;
  - Provision of a new automatic smoke detection and alarm system complying with Table E2.2a and Specification E2.2a throughout; and
  - Certification regarding the structural strength and load-bearing capacity of the existing building is appropriate for the new intended residential use in accordance with Clauses 143(1) & 143(3) of the Environmental Planning Assessment Regulation 2000.

Remediation

- A Remedial Action Plan will be prepared for the site.
- An updated Environmental Management Plan will be prepared for the site, reflecting the approved development plan.
- Appropriate public notification of the EMP will be established under section s149(2) of the Environmental Planning and Assessment Act 19979 or a covenant registered on the title to land under Section 88B of the Conveyancing Act.
- All excavation will be undertaken in accordance with the updated Environmental Management Plan.
- All excavated materials for the proposed development works should be disposed of to a suitably licenced waste landfill in accordance with the appropriate waste classification and POEO Act.
- All ground fuel storage tanks are to be removed from site.
- All incinerators located on site will be removed.

Archaeology

Pathway

- the pathway will be re-laid in its original configuration, which will reinstate the steps at the existing southern and northern ends which have been altered. The concrete sections should be re-laid using pebble aggregate, to replicate the original finish, with sandstone edging.

Upper terracing

- a portion of the upper terracing should be archaeologically excavated and recorded prior to the civil works commencing.

Lower terracing

- a section of the carpark below the line of the pathway should be excavated and the pathway and its adjacent terraces recorded.

Heritage Council Approval

- a s140 approval under the NSW Heritage Act 1977 must be obtained from the Heritage Council of NSW to permit the archaeological excavation and recording of at least two areas of the garden, including the area of the present carpark below the pathway, and the removal and reinstatement of the pathway. The permit application should be accompanied by the Archaeological statement and the 2001 results of testing, as well as a research design to guide the proposed archaeological investigation.

Fauna

- Pre-demolition removal of roofs

  It is recommended that steps be taken to allow potentially occurring microbats and other fauna to vacate the buildings where demolition or major reconstruction is required. This would include careful removal of the roof of the buildings to allow the species to escape during the following night. Removing the roofs of buildings would reduce the suitability of the derelict buildings as habitat for nocturnal species that use them as shelter during the day, and would discourage these animals from returning.

- Manual fauna removal

  Immediately prior to the commencement of development work, it is recommended that a fauna trapping program should be implemented to remove fauna that currently occupies the buildings destined for demolition or reconstruction. Trapping should continue for a one week period, with all trapped fauna being removed from the subject site. Native fauna should be relocated to a nominated site, and introduced species should be disposed of ethically.

  In addition to pre-demolition work, a trained ecologist/fauna handler should be on call during demolition to aid in the safe removal of any additional fauna still present within the building or to handle injured wildlife.

  If any animals are spotted trying to exit the buildings by demolition contractors, work should temporarily stop to allow the animal to reach a safe position.

Landscape Heritage

Trees and other soft landscaping:

- Comply with any tree management requirements of Woollahra Council, particularly in regard to those trees listed on Council's Register of Significant Trees.

- Replace any trees assessed as Category A or B in the Tree Wise Men Australia Pty Ltd report and that are proposed for removal with the same species propagated from the original or with similar species to maintain landscape character.
- Replace any trees assessed as Category C or D in the Tree Wise Men Australia Pty Ltd report that are proposed for removal with a like number of trees of appropriate species to maintain/enhance landscape character.
- Transplant on site if possible any trees identified as 'transplantable' in the Tree Wise Men Australia Pty Ltd report.
- Commission a suitably qualified and experienced arborist to carry out remedial tree surgery to those trees identified in the Tree Wise Men Australia Pty Ltd report as being of A or B retention value and to be retained in the landscaping scheme.
- Prepare a Tree Management Plan for the site that provides for regular aboricultual monitoring and a tree maintenance designed to minimise public safety risks and extend the safe and useful life expectancy of significant planting.
- Protect significant trees and other landscape elements during preliminary earthworks and construction works on site by protective measures as recommended by the arboricultual industry and to comply with the requirements of Woollahra Council.
- Carry out selective pruning of those trees to be retained to improve their shape and condition and to enhance solar access to 'The Terraces' and any new buildings, subject to approval by Woollahra Council. Pruning of significant trees should conform to relevant Australian standards (eg AS 4373 Formative Pruning) and current best practice in arboriculture as recommended by relevant industry representative groups.

Future Landscaping:

- Any future landscape works to be carried out strictly in accordance with the conservation policies contained in the CMP.
- All future landscape construction or maintenance works undertaken on the subject site should be carried out by suitably qualified and experienced tradespeople. Reference should be made to the Heritage Branch list of qualified tradespersons for each trade – refer to Heritage Branch website.
- Final selection of new plant material should take into account height and canopy spread at maturity so that significant views to, from and within the site, enhance views, not block or detract from them.
- New landscaping should be subject to a Maintenance Schedule that complies with Woollahra Council requirements and provides for the maintenance of new plant material during establishment.
- It is recommended that the following water saving strategies be implemented for new and existing planting:
  - De-compaction of garden beds to encourage greater moisture penetration.
  - Treatment of garden beds with soil-wetting agents.
  - Mulching of garden beds with appropriate moisture-retaining materials to retain moisture and suppress weed growth.

  New plantings should not include species with high water requirements unless these are essential to conservation of the original design intent.

Hard Landscaping

- Any damaged significant hard landscape fabric should be repaired by suitably skilled and / or qualified tradespersons, with materials used for repairs or reconstruction preferably being traditional materials already used in the construction of the landscape (eg sandstone).

Weeds, Feral Animals and Native Fauna

- Weeds and problem species including self-sown woody species should be controlled and/or removed under a staged control program, using well-established methods including manual removal and targeted use of approved herbicides, in collaboration with Woollahra Council, adjoining landholders and other relevant authorities/organisations.
- The presence of any feral animals such as rats, mice, foxes, feral cats, feral dogs or native animals such as possums or grey-headed flying foxes should be monitored, and any adverse impacts on significant items and areas, vegetation and wildlife recorded, with appropriate control measures implemented in consultation with relevant authorities.

Introduction to New Services

- Services and utilities such as water supply, drainage,. Power, phone and internet cabling for the new development should be provided in a manner which poses minimal environmental impact on the historic fabric or aesthetic qualities of the landscape.

Site Housekeeping

- Receptacles for no-site storage of rubbish, garden waste, landscape materials (eg mulch, compost) and building materials should be located in such a way that they do not detract from the aesthetic values of the original house and its landscape setting or significant trees on site.
- Care should be taken to ensure that sites are left in good condition after construction works. Contractors engaged in new construction or conservation work should be required to clean up and remove all surplus materials such as cement, adhesives, drop sheets, packaging materials from the site when they have completed their work.

Routine Maintenance

- Routine maintenance actions should be carried out in accordance with the general and specific guidelines in the revised CMP. Appropriate maintenance procedures should be developed, documented and implemented to ensure the ongoing retention of the cultural significance of the Scottish Hospital site. A pro-active program of cyclical planned maintenance should be developed with records kept of all major repairs and maintenance to the significant landscape and built elements.

Archival Recording

- Removal of any exceptional or highly significant fabric must be preceded by photographic archival recording in accordance with the Heritage Branch guidelines for such work.

Archaeological Requirements

- The recommendations of the Casey & Lowe Archaeological Impact Assessment should be adopted, including the obtaining of any necessary archaeological excavation permits from the Heritage Council of NSW.

Site Interpretation

- Prepare an Interpretation Plan for the Scottish Hospital site that complies with the policy and guidelines published by the Heritage Council of NSW and which effectively communicates the heritage significance of the place to residents and visitors alike, in ways that are accurate, entertaining and stimulating of further enquiry.

  The Interpretation Plan should recommend strategies, specific locations and media by which the heritage significance of the site can be communicated to current and potential future uses of the site in culturally appropriate ways that respect the heritage values of the place.

External Site Improvements for Accessibility

- Conversion of the existing speed hump adjacent to the site in Brown Street to a formalised pedestrian crossing.
- Inclusion of kerb ramps at the intersection Brown Lane and southern side of Glenview Street.
- Inclusion of kerb ramps at the intersection of MacDonald Lane and eastern side of Liverpool Street.
- Upgrade of street paving in front of 16-18 Glenview Street, Paddington.

Internal Site Access

- The layout of the proposed vehicle assessable areas will be in accordance with AS 2890.1-2004 and AS 2890.2-2002 for heavy vehicle usage.
- The swept path of the longest vehicle entering and exiting the subject site, as well as manoeuvrability through the site will be in accordance with AUSTROADS

Environmentally Sustainable Development

- Basix compliance
- Building envelope
  - Maximise building envelope design to reduce solar gain whilst maximising daylight
  - Maximise use of thermal insulation
  - Utilise high performance glazing
- Indoor environment
  - Optimise passive design to maximise thermal comfort
  - Maximise opportunity for natural ventilation
  - Maximise design to maximise daylighting
- Materials
  - Utilise environmentally sensitive products where possible
- Energy Efficiency Initiatives
  - Utilise efficient artificial lighting
  - Implement power factor correction equipment
  - Utilise efficient heating, ventilation and air conditioning system
  - Utilise smart metering
- Renewable Energy Initiatives
  - Use photovoltaic technology to reduce energy consumption
  - Utilise a heat pump system for generating hot water
  - Utilise solar heating for pool and spa heating
- Water Management
  - Utilise water efficient taps (WELS rated)
  - Utilise rainwater harvesting for landscaping use
  - Use of water smart metering

Stormwater Flooding Mitigation

- Constrict a 540mm wall at the southern site boundary towards the western end of Cooper Street to prevent the overtopping of the site by flood waters associated with levels greater than the 1 in 5 year ARI flood level.

Utilities

- Coordinate communication infrastructure servicing to the site prior to the commencement of construction.
- Confirm with Sydney Water whether upgrading of the surrounding water mains is required.
- Confirm the water pressure for availability of water for fire fighting.
- When approximate gas loads for the development are confirmed, an application to the gas authority shall be made to determine if headworks charges are applicable.
- A minimum of 1m clearance either side of the existing conduit shall be provided. Detailed plans will be submitted to Sydney Water to demonstrate compliance with this requirement. This will be undertaken at Construction Certificate stage.

Accessibility

All internal details for the Independent Living Units including room layouts and fittings will be constructed to meet the requirements of *SEPP (Housing for Seniors and People with a Disability)* 2004 Schedule 3 and AS 4299.

Tree Management

Arborist Involvement

- Further arboriculture assessment will be required for the Construction Certificate documentation.
- An Arborist (the Project Arborist) with minimum AQF Level 5 qualifications should be engaged prior to the commencement of demolition work on the site. The Project Arborist will monitor and report regularly to the Principle Certifying Authority (PCA) and the Applicant on the condition and protection of the retained trees during the construction period. The Project Arborist is to monitor any excavation, machine trenching or compacted fill placed within the TPZ of any retained tree.
- The schedule of works for the development much acknowledge the role of the Project Arborist and the need to protect the retained trees. Sufficient notice must be given to the Arborist where his/her attendance is required. Should the proposed design change from that reviewed, additional arboricultural assessment will be required.
- The Project Arborist should certify tree protection measures at key stages of the construction. Copies of the certification should be sent to the PCA.

Tree Management – Tree Retention

- Refer to the Tree Schedule (Attachment A) and Tree Protection Plan (Attachment E) for listing and location of retained trees.

TPZ Construction

- The following site-specific tree protection measures are required where construction is proposed within TPZ offsets. These requirements are in addition to the Tree Protection Requirements (Generic) listed (TWMP1-TWMP-12) at Attachment D.
  - Tree protection devices are to be installed prior to demolition of existing structures. Trunk battening will be required around several trees in the south western corner. Battening should comply with Fig. *4* of *AS4970-2009.*

- All retained trees are to be numbered, clearly identified and checked by Project Arborist prior to any tree removal works.
- Tree removal is to comply with *WorkCover NSW Code of Practice for the Amenity Tree Industry 1998.* There should be no canopy pruning undertaken unless approved by the DA Consent.
- All pruning is to comply with AS4373-2007 *Pruning of Amenity Trees.*
- Tree protection fencing should be installed immediately following approved tree removal. Fencing is to comply with Fig. 3 of AS4970-2009.
- Prohibit activities within fenced areas include: topsoil stripping, excavation, stockpiling of any building materials or site soil/rock, machinery parking, placement of site sheds (unless elevated and with suspended plumbing), machinery haul roads.
- Tree protection devices are to be incorporated into the Construction Management Plan and Sediment Control Plan.
- Timber decks and access ramps adjacent to Trees 2, 5, 6, 18, 19, 20, 89, 91, 92, 93 and 119 to be a FFLs sufficient to allow for support structures and retention of existing soil levels.
- Proposed carpark in north eastern corner to be amended (delete northern-most carpark) to allow for the retention of Canary Island Date Palm, *Phoenix canariensis* (T23).
- Port Jackson Fig, *Ficus rubiginosa* (T18) is to be pruned to allow for construction clearance adjacent RACF. Pruning works are illustrated in Photo A.
- Holm Oak, *Quercus ilex* (T81) is to be pruned to allow for construction clearance adjacent to GKL building. Pruning works are illustrated in Photo B.
- Sydney Red Gum, *Angophora costata* (T130) is to be retained adjacent to the proposed main ILU building. Selective pruning will be required given the lean towards the south. Particular care to be taken with scafforld/hoarding installation. Scaffolding is to comply with Fig 5 of *AS4970-2009*.
- Chinese Hackberry, *Celtis sinensis* (T69) and European Hackbery, *Celtis australis* (T76): retain existing retaining walls to north and west to avoid SRZ damage. Minimize grading for propose upgrade of central Terraces.
- Piling or shoring for Basement excavation is within the canopy spread of Trees 6, 18, 81, 69, 76, 119 and 130. A two stage drilling rig may be required so as to minimise canopy pruning.
- The Tree Protection Plan (Attachment E), as amended for construction should be kept in the Site office for the construction period.
- Scaffolding if required, is to be installed with appropriate ground protection and allowance for retention of adjacent branches as per Fig. 3 of *AS4970-2009.*
- Weed-free mulch should be used (100mm deep layer) within the TPZ to buffer soil drying, compaction and contamination. High traffic zones adjacent to the building works should be mulched regularly both inside and outside tree protection fencing.
- Over-excavation or benching back towards retained trees is to be avoided with vertical shoring.
- Fill batters should be steepened or retaining walls constructed to reduce the extent of fill towards trees.
- Discontinuous, pier and beam-type footings should be used where roots greater than 50mm diameter are encountered within TPZs.
- Temporary irrigation or watercart hand watering should be used during drought periods. Project Arborist to monitor soil moisture levels and instruct watering regime.

- Services are to be routed beyond or suspended within TPZs. Where this is not possible, services are to be hand dug or bored within TPZ offsets.

Tree Management – Transplanting

- Refer to the Tree Schedule (Attachment A) and Tree Protection Plan (Attachment E) for listing and location of trees to be transplanted.
- A Transplant Method Statement and Relocation Plan is to be prepared for CC documentation to accompany the Landscape Planting Plan. Palms to be transplanted are: Trees 47, 86, 110, 128 and 129.

Tree Management – Tree Removal

- Refer to the Tree Schedule (Attachment A) and Tree Protection Plan (Attachment E) for listing and location of trees to be removed.
- The tree removal is to comply with *Draft WorkCover Code of Practice for Tree Work (1998).*
- Port Jackson Fig. *Ficus rubiginosa* (T116) is required to be removed given its imminent hazard potential. This tree has had two major stem failures into the subject site caused by fungal decay. The remaining stems are similarly defective and overhang Brown Street. The tree was marked for removal at the meeting of 16.05.06 attended by Council's Tree Management Office and consultants for the previous DA (DA931/2001). This tree was previously known as *T21* on *Tree Location Plan TP01/E, 8.10.01*, prepared by Pittendrigh Shinkfield Bruce. On 16/01/11 a limb, planned for pruning, fell, with other branches on this tree in a similar unhealthy state.
- The following woody weed tree species have been recommended for removal (to be replaced with other super-advanced evergreen species) despite being sufficiently clear of the proposed construction: Trees 29, 31,32, 33, 36, 39, 44, 99, 123, 124, 131, 132, 135, and 138.

10 Conclusion

This Preferred Project Environmental Assessment report has been prepared for The Presbyterian Church (NSW) Property Trust in support of Major Project application MP 10_0016 for new Seniors Living accommodation at The Scottish Hospital site, 2 Cooper Street Paddington. The Church is seeking consent for redevelopment of the existing property for the provision of 79 independent living units and a new 100 bed Residential Aged Care Facility incorporating 20 dedicated dementia care places.

The proposal was declared a Major Project by the Minister for Planning on 9 March 2010, and is therefore subject to assessment in accordance with Part 3A of the Environmental Planning and Assessment Act, 1979. The Minster for Planning is the consent authority for this proposal. The Preferred Project application responds to the issues identified in the Director General's Environmental Assessment Requirements issued on 6 May 2010 and issues raised by the community and NSW Department of Planning as part of the public notification of the Project Application.

Assessment of the Preferred Project in terms of the key issues presented by the Department has found that:

- The proposal fulfils the aims of the Major Development SEPP, seeking consent to develop one of the last large sites in Sydney's eastern suburbs for a purpose for which there is significant identified need amongst the local community. The proposed use will help to achieve the region's residential and employment targets set by the East Subregional Strategy, on a site close to public transport.
- The proposed built form is appropriately located to respond to the various site constraints including significant heritage and landscape features, local topography and site drainage.
- The built form responds to the local context surrounding the site. Taller built elements are located towards the southern end of the site where height can most appropriately be accommodated in order to minimise impacts on the surrounding locality. The height of buildings steps down towards the north to reflect the topography and changing scale and character of residential buildings surrounding the site.
- Overlooking and overshadowing impacts to neighbouring residences are considered to be minimal. Proposed buildings are located such that appropriate separation distances to existing residents are achieved to reduce opportunities for direct overlooking between dwellings. Buildings along Brown Street and Stephen Street are well articulated to reduce the perception of building mass and scale.
- The building forms are contained below the predominant tree canopy. Detailed visual analysis shows that views across the site will not be impacted.
- The design response has paid regard to the significant heritage elements on the site. The Scottish Hospital building will be appropriately adaptively reused for residential accommodation, whilst the heritage landscape elements and archaeological items will be respectfully reinterpreted where possible to promote the ongoing interpretation of the site's history and various uses.
- The landscape response promotes retention of the significant vegetated character of the site. All significant heritage trees are retained, along with 15 of 17 'Retention Value A' trees, and 29 of 62 'Retention Value B' trees. The landscape design replaces removed low value and weed species with species more appropriate to the site, improving the overall quality of vegetation. The significant open space towards the north of the site will be retained for use by residents, congruous to the Dillon Street Reserve, and maintaining the open character of this section of the precinct. Various discrete landscaped areas are provided to meet the recreational needs of seniors.
- The proposed independent living unit dwellings have been designed to meet the relevant design and amenity requirements of State Environmental Planning policy (Housing for Seniors and People with a Disability), as well as State Environmental Planning Policy 65 – Design Quality of Residential Flat Development. Further, the proposal is consistent with controls contained within Woollahra Council LEP 1995, accompanying DCPs and other strategic State policy documents.

The accommodation mix has been informed by detailed market analysis of current demand for independent living units and residential aged care places in Sydney's east. The proposal to comprise 45% of Residential Aged Care Facility beds as 'concessional' beds will significantly improve access to more affordable care by those local residents in most need.

The range of independent living units, comprising 1, 2 and 3 bedrooms will also cater to the diverse housing needs of a wide range of older community members in a locality where demand outstrips supply and will continue to do so with the ageing demographic profile. The ageing-in-place model proposed by the Presbyterian Church will provide options for the ongoing residential and care needs of residents.

Having regard to the assessment undertaken in this report, it is considered that the proposed development responds sensitively to the site qualities and the characteristics of the local area. It will provide for revitalisation of a site and heritage buildings currently run down and in disrepair, and provide high quality accommodation for older people within the community, providing a much needed social benefit. The proposal has been assessed as being consistent with the requirements of relevant State and local planning controls will have acceptable impact on the local area and is therefore in the public interest.

Appendix A Clause 6 Declaration and Director General's Requirements

Appendix B Architectural Plans

Appendix C Community Consultation Report and Strategy

Appendix D Stage 1 and 2 Needs Assessment

Appendix E Site Survey

Appendix F Urban Design Analysis and Report

Appendix G Arborist Report and Plan

Appendix H Heritage Landscape Report

Appendix I Conservation Management Plan

Appendix J Landscape Plan and Statement

Appendix K Accessibility Report

Appendix L Traffic Report

Appendix M Operational Management Plan

Appendix N Draft Voluntary Planning Agreement

Appendix O Quantity Surveyor's Certificate of Cost

Appendix P Utilities Report

Appendix Q Solar Access Report

Appendix R Stormwater Management Strategy and Plans

Appendix S Basix Report

Appendix T Summary of Remediation Works

Appendix U Heritage Impact Statement

Appendix V Archaeology Statement

Appendix W View Analysis

Appendix X ESD Assessment

Appendix Y Threatened Species Assessment

Appendix Z Hazmat Report

Appendix AA Geotechnical and Hydrogeological Analysis

Appendix BB BCA Report

Sydney
Level 21, 321 Kent Street
Sydney, NSW 2000
Tel: + 612 8233 9900
Fax: + 612 8233 9966

Brisbane
Level 12, 120 Edward Street
Brisbane, QLD 4000
Tel: + 617 3007 3800
Fax: + 617 3007 3811

Dubai
Level 4, Attareen Building,
Saaha Offices, Old Town
Island
Downtown Burj Dubai, UAE
Tel: + 971 4 4200212
Fax: + 971 4 4200209

Melbourne
Level 12, 120 Collins Street
Melbourne, VIC 3000
Tel: + 613 8663 4888
Fax: + 613 8663 4999

Perth
Ground Floor, 53 Ord Street
West Perth, WA 6005
Tel: + 618 9346 0500
Fax: + 618 9321 7790

Australia • Asia • Middle East
www.urbis.com.au
info@urbis.com.au