142-144 Carrington Road, Waverley – New residential care aged care facility (DA 149/2012)

Report dated 13 July 2012 from the Development and Building Unit.

Recommendation: That the application be refused in accordance with the reasons contained in this report.

Note: The consent authority for this application is the Joint Regional Planning Panel (JRPP) – Sydney East Region. This assessment report is submitted to Council for information, and to consider any submission to the panel.

Devel	opment Assessment Report		
Development Application No.	149/2012		
Address	142-144 Carrington Road, Waverley		
Consent Authority	JRPP - Sydney East region		
Lodgement Date	18 April 2012		
Proposal	Demolition of existing aged care facility and construct part 3 to 5 storey aged care facility containing 86 rooms and 94 beds and basement parking.		
Zoning and relevant controls	Residential 2(b) Waverley Local Environmental Plan 1996. Draft Waverley Local Environmental Plan 2011		
Owner & Applicant	BUPA Care Services		
Submissions	Seventeen (17)		
Recommendation			
Recommendation Refusal 0 20 40 60 123 10			
PINE	1172 69 50 1 ST 14 3 33 36 5.7 9 15.17 21 23 27 26		

1. PREAMBLE

The consent authority for this development application is the Joint Regional Planning Panel – Sydney East Region (JRPP). This assessment report is submitted for the information of Council. Any comments or submission on the proposal by the Council may be separately made for consideration by the JRPP.

1.1 The Site and its Locality

The site is located on the eastern side of Carrington Road, just north of its intersection with Macpherson Street. It consists of a 29.92m width and frontage to Carrington Road which is maintained for a majority of the site before increasing slightly to a 30.985m width at the rear. The site is 73.58m deep and has a site area of 2246m².

The site and surrounding area slopes west towards Carrington Road. This site contains a fall of approximately 8.5m between the front and rear boundaries. Existing on the site is a part-two to part-three 3 storey building with parking provided at the rear for 8 vehicles. The building is a residential aged care facility providing 104 beds arranged between 1 to 4 beds per ward.

Approximately 5 trees exist on the site, situated primarily along the southern side boundary. A mature Moreton Bay Fig tree is situated on a nearby property -47 Albion Street which has a tree canopy spread over the subject site.

Surroundings buildings comprise predominantly medium density residential flat buildings. To the rear, these residential flat buildings are 3 to 4 storeys in height. An existing part one to part two storey aged care facility adjoins to north (140 Carrington Road) with vehicular access provided to basement parking via a driveway shared with the subject site. To the south adjoins a two storey residential flat building.

The site is in a prominent location overlooking Queens Park.

1.2 Background

The existing facility on the site was approved and constructed in 1987 (the approval of which was later investigated by the Independent Commission Against Corruption). The last relevant development application was DA-80/2003 for alterations and additions to the Parkdale Nursing Home including the refurbishment of the building facade and internal modifications – Approved 25 June 2003

Two Pre-DA applications have been undertaken:

- 1. PD-5/2009, Pre DA For Residential Aged Care Facility
- 2. PD-23/2011, Pre DA for aged care facility

Both pre-DA schemes proposed a building which was slightly similar to the current application. The primary issues raised include:

- Excessive Height
- Excessive FSR
- Heritage and Urban Design
- Vertical Villages
- Site Compatibility Statement

Council provided feedback advising the scheme was not supportable given its scale and resulting impacts. The height and FSR was inappropriate, not reflecting an equitable use of the site in this zone. Its scale would provide shadow and view impacts.

The zoning and existing building envelope on the site is considered to be the approximate maximum building envelope for the development. Some adjustment would possible towards the rear. Disregarding the excessive height and FSR, the design and architectural response were considered supportable with a reasonable balance of materials.

The current proposal is slightly larger than the scheme presented in the last Pre-DA lodged with Council. The same issues remain.

1.3 Proposal Description

The application proposes the demolition of existing aged care facility and construction of a new residential aged care facility being part 4 to part 5 storey building with a basement level parking accommodating 86 rooms (providing 94 Beds) with lower ground parking for 36 vehicles. Specifically the development contains:

Basement:

Kitchen and laundry services Maintenance Room Chemical Storage General Storage Rooms Rainwater Tanks

Lower Ground Level:

36 Car Spaces (Includes 2 disabled access spaces) 1 Ambulance bay Building and vehicular entry Reception area and staff amenities Smoking Area (Southern side boundary) Communal cinema / spa / hairdresser outdoor / cafe Consulting / general storage rooms Plant / garbage rooms

Ground Level:

25 Rooms (with Ensuites) Communal Lounge / Dining / Kitchen / Recreational Areas Staff Amenities Outdoor terraces

Level 1:

25 Rooms (with Ensuites) Communal Lounge / Dining / Kitchen / Recreational Areas Staff Amenities Outdoor terrace (Northern elevation)

Level 2:

18 Rooms (with Ensuites) Communal Lounge / Dining / Kitchen / Recreational Areas Staff Amenities Outdoor terraces (Northern, eastern, western elevations) Level 3:

18 Rooms (with Ensuites) Communal Lounge / Dining / Kitchen / Recreational Areas Staff Amenities Outdoor terraces (western elevation)

The primary purpose of the development is to provide a combination of low and high care aged care accommodation. The provision of the accommodation will be in accordance with the definition of residential care facilities:

Residential care facility is 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.

Note. The Aged Care Act 1997 of the Commonwealth requires residential care facilities to which that Act applies to meet certain requirements.

<u>Low</u> - Low level care places are for people who need some help. <u>High</u> - High level care is for people who need 24-hour nursing care.

2. ASSESSMENT

The following matters are to be considered in the assessment of this development application under Section 79C of the Environmental Planning and Assessment Act 1979.

2.1 Section 79C(1)(a) Planning Instruments.

COMPLIANCE TABLE SEPP (HOUSING FOR SENIORS) 2004				
Control	Standard	Proposed	Compliance	
Clause 40				
Site Area	• 1000m ² - minimum	• 2246 m ²	Yes	
Site Frontage	• 20m - minimum	• 29m	Yes	
	Clause 4	8*		
Floor Space Ratio (Site Area-2246m ²)	 1:1 (or 2246m²) maximum 	 2.16:1 (or 4853m²) Note Existing Building 1.05 (or 2366m²) 	Νο	
Building Height	8m - maximum	• Up to 15.5m	No	
Parking	 1 Ambulance = 1 1 / 2 staff = 16 1 /10 beds = 9.4 minimum 	1 space36 spaces	Yes Yes	
Landscaping	 25m² / bed (or 2350m²) - minimum 	 13.1m² / bed or 1230m² 	No	
WAVERLEY LEP 1996				
Zoning	Residential 2(b)	Not permissible (Permissible under	Yes	

COMPLIANCE TABLE SEPP (HOUSING FOR SENIORS) 2004			
Control	Standard	Proposed	Compliance
		SEPP)	
	DRAFT WAVERLE	Y LEP 2011	
Zoning	R3 – Medium Density	Permissible	Yes
FSR	• 0.6:1 or 1348m ²	• 2.16:1** or	No
	maximum	4853.35m ²	
Height	• 9.5m – maximum	 Up to 17.4m 	No
WAVERLEY DCP 2010			
FSR	• 0.6:1 or 1348m ² maximum	• 2.16:1 or 4853.35m ²	No
Building Height	• 9.5m – maximum	• Up to 15.5m***	No
Setbacks	Front - predominant	 Predominant 	Yes
	Sides - 3m	• 0.5m – 3m	No
	Rear - 6m	• 5.5m – 9m	No
Parking	• 1 / 2 staff = 16	36 spaces	Yes
	• 1 /10 beds = 9.4		
N (minimum		

Note:

*Standards outlined in Clause 48 do not impose any limitations on the grounds on which a consent authority may grant development consent.

** The floor space is NOT calculated in accordance with the new definition provided in the Draft Waverley LEP 2011. This figure would be revised slightly down under the new definition. *** The Building Height has been measured from the existing natural ground level in accordance with the DCP definition contrary to the SEPP, which measures from the proposed ground level.

Comments on above non-compliances have been provided below under respective Controls.

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

The development application has been made pursuant to the provisions of the State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004. An Assessment of the proposal against the provisions of the SEPP is provided as follows:

Part 3 – Design Requirements

Clause 30 – Site Analysis

In accordance with Clause 30 the consent authority must be satisfied the development application has taken into consideration a site analysis prepared in accordance with this clause. A site analysis has been provided.

Clause 32 – Design of Residential Development

This clause requires the consent authority to consider Clauses 33-39 which has regard to design principles. These principles have been discussed in the clauses below.

Clause 33 Neighbourhood Amenity and Streetscape

Clause 33 states that the proposed development is required to have regard to neighbour amenity and streetscape. The street façade presented to Carrington Road is acceptable in terms of its scale and architectural character.

The rear four storey element, while taking good advantage of the site's proximity to Queens Park is considered to be imposing and unreasonable on neighbours in terms of view loss and excessive shadowing.

Clause 34 – Visual and Acoustic Privacy

The proposal will reduce the level of visual and acoustic privacy to adjoining properties. The building design minimises the impact of acoustic privacy by orientating the primary communal open spaces toward Carrington Road and Queens Park. An upper level balcony to the rear will enable direct overlooking into adjoining dwellings at No.49-53 Albion Street. This is a small terrace with adequate screening possible via existing vegetation and distanced separation provided from adjoining units.

Clause 35 – Solar access and Design for Climate

The height of the building will cause unreasonable overshadowing to southern adjoining dwellings. A reduction in height, will reduce this overall impact particularly to unit dwellings on lower levels of No.49-53 Albion Street. Additional assessment has been provided in this report.

Building design provides opportunities for cross ventilation, and solar access. Not all rooms have been provided with a northerly aspect however, these rooms do have access to communal living and dining areas, most of which are orientated north. Communal areas have been orientated north, while access hallways lead to building edges where openable doors and windows are provided. The solar and design requirements required under this clause are considered to be satisfied by the proposal.

Clause 36 – Stormwater

The proposal has provided various considerations for stormwater which have been assessed by Councils Engineers and are considered generally acceptable with the imposition of certain conditions.

Clause 37 – Crime Prevention

The clause encourages designs to limit the opportunity for crime through appropriate design. The driveway and pedestrian access points are open in design and divided by low planters close to the front boundary. Numerous rooms also overlook these areas which promotes the casual surveillance of entry points and Carrington Road. All outdoor spaces are also overlooked by rooms within the facility. The level of casual surveillance is therefore considered acceptable.

Clause 38 – Accessibility

The clause requires developments to have consideration for safe movement of residents and visitors (pedestrians and vehicular) entering and leaving the site. The development will incorporate a combined driveway and pedestrian entry point accessed from Carrington Road. The access points are considered convenient and safe.

The proposal will limit vehicular access into the adjoining (unrelated) aged car facility at 140 Carrington Road. Currently the subject and adjoining sites share vehicular access to respective parking areas via a wider than standard driveway. This access has been ongoing for at least 25 years. The proposal will reduce their driveway width to 2.5m, smaller than the 3m requirement. Its loss is considered unreasonable given it will limit ambulance and basement parking access.

Clause 39 – Waste Management

The proposal has provided various considerations for waste management which have been assessed by Councils Environment department and commented on in subsequent section.

Clause 40 – Development Standards – Minimum Sizes and Building Height & Clause 48 – Standards that cannot be used to refuse development consent for residential care facilities

This development is well over these standards in the SEPP and therefore a full consideration of the impacts of these aspects of the development is appropriate:

Floor Space Ratio (FSR)

The proposal exceeds the maximum FSR provisions permitted for a residential aged care facility. The existing building on the site provides an FSR of 1.05:1 which approximates the 'as a right' maximum permitted under this provision. The proposal seeks an FSR of 2.16:1, double that permitted. The proposal fails to demonstrate that the site will suitably absorb the increased FSR with resulting visual bulk, overshadowing and view loss impacts occur to adjoining properties. These issues have been discussed further in subsequent sections. The massing of the proposal requires reconsideration to address these impacts.

Height

The proposal will substantially exceed the maximum permitted height. The development fails to respond to the context of surrounding buildings and the sloping topography of the site. A majority of new bulk is concentrated toward the rear (which is at a higher ground level) and this results in various unacceptable impacts including view loss, overshadowing and privacy loss on the adjoining properties to the rear of the site. The proposed height is therefore not supported and should be reconsidered to alleviate the above-mentioned impacts.

Landscaping

The total amount of soft and hard landscaping provided throughout the development is less than half of the requirement. The development proposes landscaping primarily along property perimeters. The plans and documentation fail to nominate planting species or indicative heights.

The submitted documentation makes no reference to the impact of the proposal on the Moreton Bay Fig tree situated at 47 Albion Street. The proposed basement parking area extends into the southern-eastern corner of the site, having significant potential impact on the root zone of the tree. Further analysis is therefore required including root mapping.

Clause 45 – Vertical Villages

This clause provides developments with a bonus floor space ratio of 0.5:1. The applicant submitted legal advice demonstrating this clause does not apply in this instance as the relevant FSR control is within a Development Control Plan (DCP) not an Environmental Planning Instrument (EPI).

2.1.2 Waverley Local Environmental Plan 1996

Clause 3 – Specific Aims

The proposal satisfies the aims of the LEP by maintaining and renewing an aged care facility. The increasing demand of such uses caters for an aging local population.

Clause 10 – Zone Objectives

The proposal exists within a Residential 2(b) zone providing aged care housing. The use is not specifically identified in the LEP as permissible however, the SEPP (Housing for Seniors and People with a Disability) 2004 permits the use.

Clauses 21-26 – Environmental Considerations

The proposed building incorporates various environmental measures. These include on-site detention system, rainwater tank for onsite re-use, waste management and passive solar

design to private and communal areas (indoor and outdoor). The proposal will not create any air pollution or ozone depleting substances. The building has been designed to also provide opportunities for cross ventilation.

Clause 32 – Development along Zone Boundaries

The site is situated directly opposite Queens Park which is zoned 6(a) - Open Space. While the subject site and park are separated by Carrington Road, consideration under this clause is relevant. The objectives of the zone:

The objectives of the zone are:

- (a) to protect, maintain and enhance existing open space, and
- (b) to maintain and improve the range and types of recreational opportunities available to the community.

Whilst the proposed development does not directly impact on the use of the nearby open space, the scale of the building to the street is considered unacceptable as it will be visually dominant and appear as extremely bulky when viewed from the park.

Clause 45 – Heritage Conservation

The proposed development exists within the vicinity of 2 Heritage Items of local significance being 150 Carrington Road – a detached Federation dwelling and Queens Park – Landscape Heritage Item.

The size and bulk of the development is considered excessive and will have negative impacts on both heritage items.

The application has been assessed having regard to the relevant provisions of the LEP and is not acceptable in its current form for the reasons discussed.

2.1.3 Draft Waverley Local Environmental Plan 2011

The Draft Waverley LEP 2011 finished exhibition on 31 November 2011 and requires consideration in the assessment of this proposal. The definition of "floor space" has been altered to accord with the model definitions in the LEP template. The applicant has used this (draft) definition of Floor Space Ratio which allows for more floor space than the current FSR definition provided in the Waverley LEP 1996 and Waverley DCP 2010.

The application has been assessed having regard to the relevant provisions of the LEP and is not acceptable in its current form for the reasons discussed.

2.1.4 Waverley Development Control Plan (DCP) 2010

The Waverley DCP, whilst not directly applicable for this proposal, can be used as a guide for requirements expected both in the locality and on surrounding sites. Controls have been provided in the compliance table at the beginning of Section 2.1.

Front Fencing

Front fencing is proposed between both pedestrian entry gates on either side of the site. It will be solid with a height of 1.5-1.8m, and span for more than half the property width. This design will be similar to the existing fencing yet dissimilar to most front fence heights along Carrington Road. Given this proposal is for a redevelopment, it provides an opportunity to consider providing no more than 1.5m high fence to enable landscaping to be visible. This

provides a modest soft landscape buffer on ground level yet maintains a barrier between public and private space open space.

2.1.5 Other Matters

Setbacks

The proposed building has side setbacks of 3m (excluding basement level). While this is greater than the existing building's 2m setbacks, it fails to increase the setbacks on upper levels by any significant amount to reduce visual bulk and limit amenity impacts on adjoining properties.

The proposed rear setback is considered generally acceptable with similar rear building lines to adjoining buildings. This setback also increases slightly as the building height increases. There remains concern regarding the reduced setback on the basement level as this may impact on the root zone of a nearby Moreton Bay Fig tree.

The front setback addresses the setback of the adjoining buildings to its south and north and is considered acceptable.

The setbacks to the south side rear, four storey portion of the building need to be reconsidered to provide improved solar access to neighbouring properties.

Streetscape

The proposal provides a contemporary street façade which presents an overall improvement on the existing building's presentation to Carrington Road. The building's façade is broken up into bays and detailed in facebrick. The street façade successfully mediates its institutional form with its more domestic context.

The upper 2 levels of the building are setback and are not immediately visible from Carrington Road. This upper part of the building will be visible form adjoining sites and farther afield and is considered to be excessive in the form proposed particularly having regard to the associated view and solar access impacts.

Views

The proposed development increases the existing building height significantly above the existing (and maximum allowable), resulting in view loss from various adjoining properties. In considering the impact on views, an assessment has been made against the planning principles established under Tenacity Consulting v Warringah [2004] NSWLEC 140. The principles require the following considerations:

1 The first step is the assessment of views to be affected.

A combination of district and iconic views are visible from surrounding properties. The affected views are of Bondi Junction centre skyline, Sydney City skyline, across to parts of western and southern Sydney. The view from some top floor dwellings include the upper portion of the Sydney Harbour Bridge however, no land to water interface is visible. These focal points exist within a single view catchment visible from each dwelling, which is more highly valued. This view also is a north-west and includes sunset over the Sydney City Skyline.

The presence of an iconic view is more valued. The upper level units with the complex at 49-53 Albion Street are considered to possess such an iconic view – see photographs.

Examples of views over the site



Above: Example view of Harbour Bridge from Unit 27 – 49-53 Albion Street.



Above: Example view from Unit 32 – 49-53 Albion Street.

<u>2 The second step is to consider from what part of the property the views are obtained.</u> The proposal will result in some view impact from the following properties:

- 45 Albion Street (residential flat building)
- 47 Albion Street (residential flat building)
- 49-53 Albion Street (residential flat building)

The most affected views occur from unit dwellings within the residential flat building at No.49-53 Albion Street. This building contains in excess of 30 unit dwellings. The number of units and scale of the site results in multiple units having aspects over their respective side and/or rear boundaries. These views are visible from a standing and sitting position.

3 The third step is to assess the extent of the impact.

The view impacts were recorded from within unit dwellings at 49-53 Albion Street. These units have northerly and north - westerly views over the site gained from kitchen and living areas, which are more highly valued than from views from bedrooms and service areas. The degree of impact on these views remains undeterminable based on an insufficient view analysis submitted with the application.

Nevertheless, it is clear from the site visits and photographs taken as part of the assessment of this application those upper level units at 49-53 Albion Street will lose views to the Bondi Junction and City skyline as a result of the four storey element of the building.

Unit dwellings at No.45 Albion Street are orientated north with respective windows and balconies (bedrooms and living areas). No windows exist along their rear elevation, facing the subject site. No.47 is a similarly designed with northerly orientated dwellings however, each dwelling also have a single window facing west. Views from these windows are limited however by an existing Moreton Bay Fig tree.

4 The fourth step is to assess the reasonableness of the proposal that is causing the impact.

The development fails to comply with the relevant Height and FSR provisions with the noncompliance considered unreasonable. Indeed the existing building is a generally compliant building envelope under the SEPP controls. The view impact is a view across a site. Maintaining these types of views is generally considered difficult and potentially unreasonable to protect.

However, in this case severe impacts are being created by the two upper levels of the building and its protrusion to the west. These parts of the building could be described as the building's 'non-compliant' parts, and greater weight is given to impact generated by non-compliant parts of a building's envelope.

The view analysis under taken by the applicant focussed on impacts from units to the rear of the site (Nos 43 and 45 Albion Street). No neighbour submission was received from these buildings and it is noted that No. 43 is owned by the Department of Housing and has no windows in its west elevation. However, No.45 has windows and balconies overlooking the site. Based on an analysis of the relative levels of this and the proposed building, the middle level units would appear to be considerably impacted by the development.

Considerable neighbour objections were received from units at 49-53 Albion Street and numerous site visits were undertaken of affected units in this building. These revealed that the view loss was unacceptable.

Solar Access

The proposed development will decrease available sunlight to the north elevations of adjoining properties to the south. Shadow plans indicate a loss of solar access to north side elevation of units at Nos.49-53 Albion Street and 146 Carrington Road.

The impact appears to be severe on the ground and first floor side windows to the units at 49-53 Albion Street which face the site. For example, side bedroom and kitchen / living windows to mid level units at 49-53 Albion Street lose a minimum of three hours mid winter solar access between 9.00am and 3.00pm as a result of the development. Given the location of these units and the planning controls for the site, this impact is not considered reasonable.

ESD

The proposal is not subject to BASIX requirements however as mentioned previously, various ESD measures which have been incorporated into the development. These include on-site detention system, rainwater tank for onsite re-use, waste management and passive solar design to private and communal areas. The building has been designed to also provide opportunities for cross ventilation.

Safety and security

Safety and security within the development is considered acceptable. A combination of rooms and common areas face Carrington Road providing ample casual surveillance.

Pedestrian and vehicular access is provided along the northern side of the site, accessed directly from Carrington Road. Minimal development along the front boundary including low scale planters ensures pedestrian safety is maintained.

3 REFERRALS

3.1 Internal

Environmental Issues

The application was referred to Council's Environmental Health Officer for consideration and the proposal was considered satisfactory subject to conditions.

Waste Management

The application was referred to Council's Environmental Manager for consideration and the following response was received:

We are not satisfied that the submitted SWMP checklist adequately estimates the waste generation rates to be expected from the facility. However, I am satisfied that the waste collection requirements can be reconfigured to fit within the planned garbage storage area. Therefore, I am satisfy that the application complies with the Waverley DCP pending compliance with the following conditions of consent:

The applicant must provide 6 x 6560L MGB for garbage and 8 x 240L MGB for comingled recyclables collected weekly. The applicant must enter into a commercial waste contract for the removal of these bins.

The waste and recycling storage area must be able to accommodate all bins, with all bins simultaneously accessible.

Comment – The above concern could be satisfied via a condition of consent.

Stormwater

The application was referred to Council's Engineers for consideration and was considered acceptable subject to the inclusion of standard conditions.

Traffic / Vehicular Access

The application was referred to Council's Technical Services for consideration and was considered acceptable subject to the inclusion of conditions:

Comment – These comments are noted and could be addressed in an amended scheme.

Heritage and Urban Design

The application was referred to Council's Heritage and Urban Design Officer for consideration and the original issues raised in the Pre-DA to a similar scheme have been reaffirmed as follows:

Comments

- The existing building is of limited aesthetic appeal and generally detracts from the setting. The replacement structure substantially expands on the bulk and site cover of the existing structure and will have greater visual impact upon neighbours and the park opposite.
- Landscaping appears limited to screen planting and provides limited opportunity for planting in depth.
- The floor plans provide limited use of the expansive views to the west for communal areas.
- Where outlook is provided to the roof top the outdoor deck will become untenable for much of the year due to lack of shelter and western exposure.
- Glazed balustrades facing west will provide a glare source to the park.
- Central courtyards to the northern side lack any cross ventilation.
- Treatment of west facing windows to upper floors is not shown (or is this vertical louvered wall?)
- The monolithic treatment of side elevations will provide poor outlook to adjacent buildings.

Recommendations

To maintain the setting and aesthetic qualities of the upper Queens Park landscape and the amenity of adjacent buildings it is recommended that the above aspects be considered in design development.

Comment – These comments are noted and could be addressed in a smaller and better articulated building. Nevertheless, the street elevation is supported noting the improvement on the existing building and institutional nature of the site.

Building Code of Australia Compliance

The application was referred to Council's Senior Building Surveyor for consideration and the following response was received:

The Preliminary BCA Assessment Report states that compliance with the deemed-tosatisfy provisions of the Building Code of Australia "is readily achievable" and "details will be provided with the application for Construction Certificate." and in conclusion states that;

"it is considered that the proposed development can readily achieve compliance with the relevant provisions of the BCA2011. Necessary documentation will need to be provided with the application for Construction Certificate to demonstrate detailed compliance with the BCA2011."

However it should be noted that the Preliminary BCA Assessment Report proposes that certain non compliances with the deemed-to-satisfy provisions of the Building Code of Australia are to be addressed by Alternative Solutions to demonstrate compliance the relevant BCA Performance Requirements.

In this regard no alternative solutions and fire engineering have been formulated or detailed in the BCA Assessment Report, therefore there is no evidence that the

relevant Performance Requirements of the BCA will be satisfied, it being noted that the concurrence of Fire & Rescue NSW may be required for the proposed alternative solutions. In addition a number of specific non compliances with the provisions of Section D of the BCA in relation to number of exits and construction of fire isolated exits from the building are significant.

As a result there is no certainty that the proposed development in its present form will fully comply with the Building Code of Australia and the requirements of Fire & Rescue NSW under Clause 144 of the EP&A Regulation 2000 and may be subject to further modifications prior to issue of a construction certificate necessitating the lodgement of a Section 96 modification application to Council.

Therefore the applicant should be required to submit revised plans and details complying with the Building Code of Australia accompanied by a supporting BCA Compliance Assessment Report addressing the specific non-compliances with the deemed-to-satisfy provisions the Building Code of Australia for further assessment by Council.

Comment – This comment generally requires additional exits from the basement levels and could be addressed in an amended scheme.

Access / Aged Care Officer

The application was referred to Council's Community Officer for consideration and the following response was received:

The application proposes replacing the existing 102 bed, residential aged care facility with a new 94 bed facility over four levels. The application indicates that Bupa offers a range of levels of care, including ageing in place programs and extra service facilities.

Care support services and management

- An ageing in place approach which includes low, high and dementia care places is noted and supported.
- It is agreed that there is a demand for greater choice and flexibility in aged care service provision to meet individual needs, cultural needs and preferences. Whilst many people will be in a financial position to afford a range of extra services, affordable accommodation and support is consistently identified by the community as a concern for many older people in Waverley. The Aged Care Assessment Team (ACAT) also continues to report the need for more concessional places for lower income residents in the area. Therefore, provision of concessional places for low income people would be most welcomed.
- A relocation strategy that is developed in consultation with existing residents and their families is noted and supported.

Building plan, amenities and facilities and design

Guidance on design from a specialist in aged care is welcomed to ensure provision of the following elements: safety and security, ease of mobility, provision of clear visual cues to minimise disorientation, adequate lighting, a home-like environment, appropriate privacy, facilities for visitors, provision for planned and safe wandering, access to facilities and activities and opportunities for socialisation with other residents.

Disability access

 The proposal is required to meet relevant disability access and mobility standards. It is recommended that an Access Specialist is engaged to conduct an access audit and to provide advice on detailed design elements, such as bathroom fit outs, outdoor areas and safe pedestrian pathways.

Location and access to community services, facilities and transport

• It is agreed that the development is located close to community facilities, medical facilities and public transport

Parking

• The inclusion of two mobility car spaces and space for a commuter van is noted and supported.

Comment – Some of the above matters could be addressed via conditions of consent however Council does not currently have a policy basis for requesting more affordable aged care accommodation.

Public Domain/Tree Preservation

The application was referred to Council's Tree Management officer for consideration and certain requirements were stipulated.

Comment – The above matters could be dealt with as conditions of consent.

Section 79C(1)(b) - The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.

The proposal will have positive social implications by maintaining the aged care use of the site. The driving demand of the use is considered to rise with an aging local and regional population. The proposal will not generate any major economic changes within the locality.

Nevertheless, the proposed building form is too bulky measured against current controls and identified impacts.

Section 79C(1)(c) - The suitability of the site for the development.

Having regard to the previous use of the site, a continuation of the same use is supported. The proposal's bulk and scale is considered excessive for its respective Residential 2(b) zone. The impacts will result in view loss, overshadowing and visual bulk, having undesirable impacts on neighbouring dwellings.

4. PUBLIC SUBMISSION

The application was advertised for 14 days in accordance with Waverley Development Control Plan 2010, Part C3 – Advertised and Notified Development.

17 submissions were initially received. 2 submission however were from properties which had already submitted. The issues raised in the submission are summarised and discussed below.

Most objections below agreed to aged care use being maintained on the site.

Property	Location	Summary of Objections	
16 / 49-53 Albion St	Adjoins south- east	 Insufficient Plans View Loss Impact on Moreton Bay Fig Tree Loss of Trees Height 	
18 / 49-53 Albion St	Adjoins south- east		
21 / 49-53 Albion St	Adjoins south- east		
23 / 49-53 Albion St	Adjoins south- east	ExcavationDrainage	
24 / 49-53 Albion St	Adjoins south- east	 Noise Privacy 	
26/ 49-53 Albion St	Adjoins south- east	Streetscape Impact / Dominance	
27 / 49-53 Albion St	Adjoins south- east	 Solar Access / Overshadowing Property Value 	
32 / 49-53 Albion St	Adjoins south- east	 Precedent Scale / Overdevelopment	
33 / 49-53 Albion St	Adjoins south- east	HazardsEnvironmental Impact	
- / 49-53 Albion St	Adjoins south- east	Misleading Approval / SEE Report	
140 Carrington Road	Adjoins to North	Traffic / Parking	
4 Santa Maria Ave	Surrounding	 No Public Consultation Misleading Photomontages 	
9 Santa Maria Ave	Surrounding north-east	 Absent levels of adjoining buildings Setbacks 	
11 Santa Maria Ave	Surrounding north-east	 Shared driveway access Fire Access 	
6-8 Santa Maria Ave	Adjoins to north- eastern corner	 Unsympathetic Design Inconsistent architectural fabric 	
		No model provided	
		Insufficient Landscaping	
		Unclear Fencing	
		Traffic / Access	
		Setbacks	
		 Rectify damage on adjoining dwellings 	

Issue: Height – Proposed height of the development is excessive and surpasses predominant height of developments in the area. Its height will cause numerous issues (summarised below). The additional height will exceed the existing building by approximately 8.9m.

Comment – The height proposal exceeds the maximum allowable Height and FSR. The development will impacts on adjoining dwellings creating view loss, overshadowing and visual bulk. These issues would not be as significant had the development complied.

Issue: Scale / Overdevelopment – The scale of the proposal is an overdevelopment of the site which is out of character with surrounding development. The predominant height of most buildings along Carrington Road, Macpherson and Albion Streets are 3 storeys, well below the proposed height of 5 storeys. The bulk of the scale is due to the introduction of additional facilities and basement parking carrying the same number of beds which is excessive.

Comment – The scale of the proposal is considered excessive for the site and is oversized contextually. This has been discussed at length in this report.

Issue: Setbacks – Proposed building provides minimal side setbacks with no landscaping treatment to soften the buildings appearance. The proposal could easily allow for greater setbacks and still provide reasonable development scale.

Comment – The proposal provides varying setbacks. Setbacks from lower levels are considered acceptable however the increased setback should be considered on upper levels to achieve a reduction in overshadowing, view loss and bulk.

Issue: View Loss – View interruption is a result of excessive height, scale and location of the building. The proposal will interrupt direct and filtered views which include city skyline (Bondi Junction and Sydney), park and general district views which extend to Botany Bay (from various dwellings). Contrary to the view analysis the proposal will impact on high-quality views gained from multiple dwellings.

Comment – The proposal will interrupt views. The extent of view loss should be addressed. A detailed analysis of view loss has been provided in the previous section.

Issue: Unsympathetic Design – Proposal does not respect the existing character of Carrington Road and will degrade public and private open space.

Comment – Ignoring the bulky scale addressed in previous issues, the proposal does provide a suitable architectural design with detailing and a variety of features and materials.

Issue: Streetscape and Dominance – Proposal will create a detrimental impact to the streetscape and presents a massing and modulation contradictory to Carrington Road, dwarfing neighbouring properties. It essentially fails to recognise the desirable elements of area with height and bulking bulk being the primary issues impacting the streetscape. The proposal will also be highly visible from Queens park, appearing as the most dominant building along the eastern side of the park.

Comment – Architecturally, the proposal will provide an improvement on the existing building design present on the site, having a more positive contribution to Carrington Road. A detailed analysis of streetscape has been provided in previous section.

Issue: Heritage – Proposal does not respect the Heritage significance of Queens Park. The photomontages do not represent an accurate representation of the impact on Queens Park.

Comment – The proposal is a large scale in a highly prominent location. An analysis by Councils Heritage officer made recommendations in relation to certain aspects of the building which have been detailed in a previous section.

Issue: Privacy Loss – Proposal will reduce privacy of southern adjoining dwellings with 24 windows along the southern elevation providing direct overlooking between neighbouring buildings.

Comment – The proposal will increase overlooking onto both southern adjoining residential flat buildings. Contributing to this increase is the removal of trees along the shared boundary which currently provide screening between the sites. Windows proposed along the southern elevation do not appear to be provided with any form of screening. A reduced height and FSR would reduce the number of windows. Additional information for landscaping is also required.

Issue: Noise – Noise during construction and operation present issues. The upper level balconies appear as entertaining areas and will generate additional noise. The excessive height of the buildings will also create an echo effect.

Comment – Noise during construction has been addressed in subsequent comment referring to construction works. Noise generated from upper level terraces is not considered to be unreasonable. Primary outdoor spaces have been orientated towards Carrington Road with the nature of the use not expected to generate unreasonable noise levels. The remaining upper level terraces are slightly smaller and also acceptable.

Issue: Traffic Access and Parking – Proposal will generate additional traffic entering and leaving the site.

Comment – The proposal will not generate greater traffic in the surrounding area, but rather an increase in traffic entering and leaving the site. A similar number of beds (110) currently operates from the site. The lack of site parking would translate into current visitors occupying on-street parking spaces. The proposal will relive pressures of current parking situation surrounding the site.

Issue: Loss of Trees including impact on Moreton Bay Fig – Proposal will sacrifice vital trees and landscaping on the site reducing green outlook and its use as a natural privacy screen.

Comment – The basement will have close proximity to the existing Fig tree. No analysis has been provided of potential impacts on the root zone of the tree by the basement excavation. Further investigation is required.

Issue: Excavation – There is a real possibility that sandstone rock surrounding the garages will be destroyed.

Comment – Further analysis is required by the applicant to determine to stability of the sandstone which exists below the their current natural ground level and forms part of the side boundary shared with No.49-53 Albion Street.

Issue: Drainage – Further drainage problems are envisaged from the new building.

Comment – Stormwater plans and specifications have been submitted and reviewed by Councils engineers and are considered acceptable. They have also recommended the imposition of conditions on any consent.

Issue: Insufficient Landscaping / Loss of Trees – Proposal does not provide adequate amounts of landscaping on the site. The number of trees will also be reduced which will impact on local wildlife. There will be an overall reduction in the amount of green vegetation on the site.

Comment – The proposal will increase the amount of landscaping on the site which still falls deficient of the requirements. The type of landscaping proposed across the site also remains unclear. A more detailed discussion has been provided in previous sections.

Issue: Unclear Fencing – Plans do not show boundary fences and given the scale of the proposal all boundary fencing will be replaced.

Comment – Proposed fencing details along the side and rear boundaries remain unclear and additional detail and clarification is required.

Issue: Inconsistent Architectural Fabric – The proposal will be highly visible from numerous locations within the area.

Comment – The proposal will be visible from numerous private properties and the public domain. As discussed previously, the scale and massing of the proposal is bulky and will impact on adjoining properties.

Issue: Fire Access – 140 Carrington Roa) rely on access along the boundary shared with the proposal as an alternative fire escape to Carrington Road.

Comment – Access along the southern side of No.140 will be retained up until the basement car park entry. Fire access will still be maintained along the northern side boundary.

Issue: Shared Driveway Access – The shared driveway access between 140 and 142-144 Carrington Road will be compromised.

Comment – The proposal will limit vehicular access to No.140 by providing them with a 2.5m wide driveway to access their site and existing basement parking. This falls short of the 3m requirement required under standards. This limitation is considered unreasonable. The issue should be revisited as scope exists to make minor adjustments to the external walls and planters to maintain proper access.

Issue: Solar Access / Overshadowing – No mention is made in relation to overshadowing along the east of the building. A significant amount of shadow will occur to southern adjoining buildings.

Comment – The proposal will cause an unreasonable amount of overshadowing to adjoining dwellings. This has been discussed at length in previous sections.

Issue: Misleading Photomontages – The submitted photomontages are misleading and only show the 3 storey building instead of the 5 storey building which is much larger. The montage also conceals a large proportion of the development behind a tree.

Comment – It is noted the submitted photomontages appear to provide a perspective which shows this least amount of impact contextually including streetscape design. Nevertheless, an analysis of the impact was made by using the architectural plans and from various site visits to adjoining sites and the surrounding area.

Issue: Insufficient Plans – the plans do not provide RL's of the adjoining buildings to enable a better understanding of the impacts.

Comment – The submitted surveys do provide the RL's of adjoining buildings including window sill heights.

Issue: No model provided – The submission did not provide a model for objectors to consider when inspecting the plans at Council.

Comment – The model was available to view at Waverley Customer Service Centre during the advertising period.

Issue: Precedent – The proposal has the potential to create a precedent for the development which may be considering expanding across other sites in the future. The adjoining sites will also attempt to build to a similar height and scale which will develop a prominence along this section of the street.

Comment – The proposal is considered on its own merit and precedent is not, in itself, an adequate reason for refusal.

Issue: Absent Levels from floor plans – Plans do not show levels of adjoining buildings

Comment – The survey does provide levels to window sill heights of adjoining properties.

Issue: Misleading SEE Report – Various statements within the report are incorrect including those relating to public consultation, view loss, landscaping and impacts.

Comment –The information contained in the SEE report is not conclusive. This assessment determines the validity of the submitted information against relevant planning provisions.

Issue: Property Value – The proposal will cause various impacts which will devalue surrounding properties.

Comment – The impact on property value is not considered a planning consideration.

Section 79C(1)(e) - The public interest.

The proposal is not considered to be in the public interest. Its impact on the surrounding area including Carrington Road and Queens Park will have bulk and scale impacts which require re-consideration.

5. CONCLUSION

The existing aged care facility on this site meets (or exceeds) the maximum bulk and density expectations for the site under the current Residential 2(b) zoning and the bulk and scale provisions of the Seniors SEPP, as shown in the below table

Policy	Control	Existing Building	Proposed Building
WLEP 1996	Residential 2(b)	Permissible (SEPP)	Permissible (SEPP)
Zoning	Two to three	Two to three storey	Three to five storeys
	storeys	storeys	
Seniors SEPP			
FSR	1:1	1.04:1	2.16:1
Seniors SEPP			
Height	8m	Up to 10m	17.4 m
Draft LEP			
Zoning	R3 Medium	Permissible (LEP)	Permissible (LEP)
	Density Residential		
Height	9.5m	Up to 10m	15.5 m
Floor Space Ratio	0.6:1	Approx. 0.9:1	Approx. 1.94:1

<u>Note:</u> The height definition in Waverley LEP and SEPP varies, as does the floor space definition between the Waverley DCP and Draft Waverley LEP.

Whilst the standards specified in the SEPP are 'can't refuse if you comply' standards, nevertheless, the floor space control in the SEPP still provides for a generous 40% increase on the current DCP control of 0.6:1.

As shown in the above table the proposed development is well beyond the current and future development expectations for the site.

The applicant went through a pre-development application (pre-DA) process on this scheme and advice was issued in March 2009 stating that the proposal is not supportable due to its excessive height and FSR. Based on review of plans and site visits, it was considered that the excessive height and floor space of the building led to numerous amenity impacts including view loss and shadows. The issue of eliminating the shared driveway access with 140 Carrington Road was also raised.

The scheme that was reviewed at the pre-DA stage is similar to what is presented in this application and apart from some reduction in height, the current scheme is in parts, bulkier than that previously proposed. Internal courtyards have been filled-in, and the projection of the upper level to the west increased. This application has failed to address the issues raised in the pre-DA advice.

The shadows generated by the rear four (4) storey portion of the building also results in north side ground and first floor windows to units at 49-53 Albion Street falling below reasonable solar access standards (e.g. 2 hours sunlight between 9am to 3pm at mid winter). This impact is very unreasonable given the excessive bulk of the building.

The current scheme is considered to have various significant impacts as a result of its excessive bulk and scale

Whilst acknowledging the considerable social benefits of this use by providing for much needed aged care accommodation, the scheme results in unacceptable and unreasonable impacts and therefore the application is recommended for refusal.

6. **RECOMMENDATION**

That Development Application No. 149 /2012 at 142 -144 Carrington Road for a residential aged care facility be refused by Council, for the following reasons:-

- 1) The proposal is an overdevelopment of the site under the provisions of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 as the proposed development conflicts with the following principle of the SEPP:
 - a) Clause 48 The development exceeds the standards in respect to building height (8 metres), density and scale: (floor space ratio of 1:1 or less), and landscaped area (25 square metres of landscaped area per residential care facility bed); and
 - b) Clause 33 Neighbourhood amenity and streetscape. The proposed building provides for unreasonable impacts on neighbours in respect to views loss and overshadowing.
- 2) The proposed development is an overdevelopment in its Residential 2(b) zoning under Waverley Local Environmental Plan because of its bulk and scale which causes significant impact on adjoining properties in terms of loss of views and solar access.
- 3) The proposal is an overdevelopment of the site under the provisions of Draft Waverley Local Environmental Plan 2011 as the proposed development does not comply with the floor space and height controls of the R3 Medium Density Zoning.
- 4) The proposal results in unreasonable impacts on solar access to surrounding unit dwellings.
- 5) The proposal results in unreasonable impacts on views from surrounding unit dwellings.
- 6) The proposal results in unreasonable on the mature Moreton Bay Fig Tree situated at No.47 Albion Street.



INNU DINERINGA A ISSUED FOR DA. PRELIMINARY B ISSUED FOR DA. PRELIMINARY C ISSUED FOR DA Amendmente





























LMC

0








R:11/12671-10 ау <u>
- 18.04.12</u> - ПА - 2ЛЗ С LMC 3001 200 NO DISWING NO 1:100@A1 S10-258 DA - 203 RK Approved PLANT ROOM Plattad and checked by Varitied RK Fila Scale Job No Creation Date WASTF PARTINI INPACARE - QUEENS PARK RACF 142 CARRINGTON ROAD, QUEENS PARK PARK TIIL LONGITUDINAL SECTION The drawing is the regringent of datasy of a by the and may out by therefore the provident of the state in the state of the state is drawners in the state of the state is the state of the state is drawners in a discontinue or person and state of the state of the construction of the state is a state of the state of the state of drawners the state of the state of the state of the state of the drawners of the state BED 40 8ED 76 8ED 52 DED 17 SITTING SITTING ONILLIS SITTING NBNT NEN NaNO NEN Group GBA, Pry Lie ABN 79 002 113 779 House 11: 00 01114 Science 1990/07 WEW Austialie 2011 Wew, Gradowa.com 7:012 0301 4144 F. 012 0332 3468 T. 012 0301 4144 G. 94/09 Waldaha Buadus Amerikalika Sukida 3999 CAR PARKING ZONE Level 19, 201 Kent St. Sydney NSW Australia 2000 しそしじそしそう ような 8ED 80 9ED 82 8ED 20 BED 44 TU LOUNDE TV LOUNDE DIMINIO SERVERY SERVERY GAMES GAMES BATHROOM BATHROOM STORAGE STORAGE LIFT 02 SNILLIS ONITTIS SITTING DNILLIS SITTING STORE rt.AMER PPS Group Level 12, 92 Pitt St. Cert.Higr, 4401, Sydney NSW Australia 2001 LIFT 01 STORAGE SERVERY STORAGE SERVERY ARCHIVE TENA STORE Г TIIII Consultant Date . MAINTENANCE ROOM READING LOUNGE READING LOUNGE TERRACE WAITING AREA NBNIT NON WIRASHUS BATHROOM BATHROOM TERRACE HAIRDRESSERV Issue Description Amendmanta BED 02 9ED 02 SPATHERAPY Date 02/04/12 12/04/12 RL 77.8 LOWER-GROUND-FLJOCK BASEMENT-LEVEL RL 74.3 TOP OF PARAPET RL 94.7 Amandiseois Issue Carcifiles A ISSUED FOR DA PRELIMMANYY B ISSUED FOR DA PRELIMMANYY C ISSUED FOR DA GROUND FLOOR RL 81.4 LEVEL 03 RL 91.0 LEVEL 02 RL 87.8 LEVEL 01 RL 84.6









us colleyano "Capital" quas & GROUNDCOVERS alticity or office

anic Name

enbueses eija

e Wiri Image' Otropium arbanescens rdenia ovgusta 'Florida

Vepeta x faossenii Dregono vukgore Tasu banksiae "Lutea" Tasmarinus officianalis ndula angustifalla raya paniculata

atria officinalis tochys lanata rachelospermum je Trachelospermur Vitumum tinus





211 1621 = 10
 Description
 <thDescription</th>
 <thDescription</th>
 P24 This densing is copyright and is the property of TAYLOR THOMSON WHITTING (NEW) Fifty Lid and must not be used without authorization. NOTES AND LEGENDS CO1 ANS NO DEPART 081678 CO PROFES CONSIGN Actions GROUP GSA LEVEL 7, 80 WILLIAM STREET, EAST SYDNEY NSW 2011 New Contraction Edy PI ABWN BUN BBA BUPACARE QUEENS PARK RACF 142 CARRINGTON ROAD EXESTION AND SEDMENT CONTROL MOTES 1. An set of the trenshy rearisment, (1) Lest attempt rearisment, (2) Lest attempt rearisment, (2) Lest attempt rearisment, (2) Rearisment of constraint and the montante (2) Rearisment of the trenshy and the trenshed for the new set of the error State that the trenshed for the new set of the rearisment and the trenshed for the new set of the rearisment and the trenshed for the new set of the rearisment and the trenshed for the new set of the rearisment and the trenshed for the new set of the rearisment and the trenshed for the new set of the rearisment and the trenshed for the new set of the rearisment and the trenshed for the new set of the rearisment and the trenshed for the new set of the rearisment and the trenshed for the new set of the rearisment and the trenshed for the new set of the rearisment and the trenshed for the new set of the rearisment and the trenshed for the new set of the rearisment and the trenshed for the new set of the rearisment and the trenshed for the new set of the rearisment and the trenshed for the new set of the new set of the rearisment and the trenshed for the new set of the new set ler pils are cardinard in local achimatiy ler pils are carritrarella prevent alle nonalt celeting as all fercars are arched around pils. Cobjete of mit budge statubed is up yone firme cobjete of mit budge from scars and around. De not a material in rooderpy, arear dromoge pils or in Constructions of placings by a monitoring structure of placing by a monitoring beneatly analysis of the parameters and a one visual community analysis of the parameters and a construction of the provest bias place and the place and place beneatly and place and a construction of the place and place and a construction of the place and place and a construction of the place and a construction of the place and a ourses prement provide sund hay keth Met selfman N krops upskream of wisting pile. r pit surround cround of proposed pile tein a strip of turf on both sizes of all roods clien of keebs. and weter control measures are to be put shock in plot if of each working day, and modified to best suit site enseinen auf die sollteren of ber sile such field it doer no het file einterbed sile. Ans the einterlied wilde. mysocory construction beithyfail, et elemend and impacted fael weblete leening ibe ein stad be themend and impacted fael rearms, rearms, 11, Aleidate at Starmeter pipes and pits close of obtaits and subtrant, hisperi, stormwater poliare and close and olfer eas form event, 22. Chen and is a reacion was radment contral devices after each storm event. a to be oppress sy use the implemented autimum control data, shall be implemented the varying sitewilene as work on site prog on and antimont control devices to the mole pr and antimont control devices to the mole 1. Some the barry of the structure barry o 1. Figure 300 dia and karger to he reinfarced concrete Cass operand apol and nocket with radius ring joints UNLO. 1. Figure up to 500 die shall be sewer grade uPVC. with setten which finitus. strength WD or FCP pipes may be used subject pilo may be used ratemat to the building subject the by Superhumdent STORNWATER DRAINAGE NOTES overslow. 1.5. Construct turf linod overlee. 1.6. Previde neodiscy zediment tr 2.º Construct neotexile silor pil -i -i Humber 600 x 600 Clear 0 golvanised mild 4,9,10 steed grate listged to trame
 DTL_SCHEDULE
 Addition
 1,2,1 313 Slarmwaler line with pipe laper and flow direction Teper barb to zero height over 500 mm Concrete necessed stormenter like integral kirds with odge downturn Grafed droie Subsolt droinage line (100 dis) dde integral kerb sickoned edge 4 kerb with Unickoned ster pit, flaw direction 450 x 450 Cleas D golvanised mild steel grate histori to frame forent level upsilvant Place also end classe Place upsilvant Thew (Likees per secrend) Invert level downstream 900 x 900 Class 0 geivenised mid steef grale blaged to frome Greet Pollution trap as per Rocta's CDS unit (PC0506 Beckwork relaising well herefeet expension join! slable inlegral kmb iticiosek relaieng sul Keyed construction joint Sectored place bint Thicked surface level ned edge Grees colds drain Robling point let and loc Fied keyed pist contothe kerb Festing point Inicial animatic hished contous stayral kerb Down pipe Som joint Communation of the second s 80 4 O-----8 1-10-1 ↓ ↓ ↓ ···· *--- *-- > а <u>2</u> STEWDRKS LEGEND F22.20 LINDO 600 + 7 1.254 0~345 L/s NK. A+0 K41 XIA WK+TE K+TE P. 3 52200 B Serface intel pil C Surface telet plt Surface felct pil Storen and a second seco I. Al locacore relation (in carry) will list, specificials (in S3) (in the concernent in the carry of share and an end of the share of a start of the model and an end of the start of the start of the start of the edgement and an end of the start of the start of the other and the start of the start of the start of the start of the answer of the start o Light Theraces Welling does not provide the life a tractor memory are not accessible to the second provide the life a tractor is the second area on the second provide the life a prostate is the second area of the second area of the second the database and confirm has need based on the second the database part to accessible on the second area of the second the addressible of the Unighter/Doperitienteed. a contractor is to get approved share the referency days survey that the the three more approved. This shares had in and finited z also deropy days (SSD), Permonent Nets (PN), consider z and zand z and z and z and z and zapproximation of the transmission of zapplied in or way. Dena Hia Rec Date DAH C 27.02.12 73041 A 15.02.06 . Contractor must verify all dimensions and existing levels on alle prior to commencement of works, key discrepancies to be reported to the These drawings have been backed from, and to be read in caringtian with the tablering Consultants drawings. Key conflict to the drawings must be notified framedicity to the Engineer. Lucrular parameter los constructos de la construction de la construction de la constante los la la constala no la valla constala no la valla constructos de la construction pendenda lo usa constructos de las constructions pendenda lo usa front constructos de las las constructions pendenda lo usa front constructos de las las constructos de las constructos de las las constructos d ans of underground services aboven an Taylar Phonescon Bronkogs them been photlend frees aboven na provided by Inheitien. This information heat abone perspected safely for the own use and may nais necessarily be appleded a cacruptic catilato of services at recented by the outlocity of the time of otion may not reflect transport in the physical environment quent to instatholow. CUND STRVICS - INSPACE **Ling. Tike** ARCHIFICTS SURVEY REFERENCE DRAWINGS SITEWORKS NOTES GENERAL NOTES Consultant Caroup CSA RYGAIE

11.1 - IVE JI wai kalend ali keli - mjemi 1580 - paketo munime

Al month of the second second



