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WINGECARRIBEE SHIRE COUNCIL		
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OFFICER	DO	INFO
E. Varga		✓

Wingecarribee Shire Council
PO Box 141
Moss Vale NSW 2577
Attention: Ellie Varga

Dear Ellie,

**RE: Additional Information in relation to Development Application
16/1198, Harbison Care, Charlotte Street, Burradoo as requested by the
Joint Regional Planning Panel**

I refer to the above Development Application. Please accept the following in satisfaction of the requests made by the Joint Regional Planning Panel at its meeting of 17 March 2017 and articulated in your letter to Jim Gilvarry & Associates dated 21 March 2017.

The request is primarily for specific details of the overall Master Plan and to do that in the most efficient way we are submitting a series of plans prepared by Calder Flower Architects that are iterations of the plans previously submitted. My comments below will assist in understanding and clarifying the plans and where appropriate I have made reference to the *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004* (the Seniors SEPP). There are also plans from Chris and Charlotte Webb showing retained and removed trees, along with a Landscape Strategy Statement.

○ Building heights

Refer to Calder Flower Drawing No.A015 Site Elevations

With reference to Part 7 Divisions 2, 3 and 4 of the Seniors SEPP, if buildings are 8 metres or lower in height, then height cannot be used as a reason for refusal of a Development Application. There are no buildings in any proposed stage of development that are more than two storeys in height and all buildings are within the 8 metre height limit. The two storey scale of development is compatible with the residential locality of the site.

○ Setbacks of buildings to boundaries and building separation setback

Refer to Calder Flower Drawing No.A004 Delineation of Stages by Precinct.

Providing a range of Planning and Development services including:

· Planning Proposals · Statement of Environmental Effects · Strategic Planning and Development advice · Advocacy and problem solving
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This Plan shows all proposed buildings with proposed boundary setbacks and building separation distances. Of particular note are the setbacks to the Stage 4 Independent Living Units (ILUs) of 16 metres to Charlotte Street and the generous spacing of these buildings along Charlotte Street, ranging between 14 metres to 27 metres. This will ensure that the built form is consistent with the rhythm of housing generally along Charlotte Street and allow views between the buildings to the large village green space beyond.

○ Overall Landscape Strategy

Refer to Landscape Strategy Statement and Stage 4 Landscape Concept plan, both prepared by Chris & Charlotte Webb.

A significant proportion of existing trees upon the site are to be retained and the development scheme provides ample opportunity for significant new plantings. The central village green is a case in point, where existing trees can be supplemented by selected plantings to create a central space with a defined landscape character that is currently not evident on site. The submitted Landscape Strategy prepared by Chris & Charlotte Webb recognises at present trees are less dominant than buildings on site, there are very few taller trees and the density of trees is low internally compared with the perimeter of the site. This will be addressed by the landscape works to be undertaken over the course of the development.

The Strategy will create a 'green heart' at the village green with the opportunity for some large trees to be planted. Chosen species throughout the site will draw from the plant pallet of Burradoo gardens to better integrate the site into the local residential context.

Some trees can be replanted, but overall there will be more new trees planted than old trees removed. Particular attention will be paid to the landscape character of Charlotte Street with discrete pedestrian entrances, garden paths and an array of hedging that is characteristic of many Burradoo streetscapes. Refer to plans submitted.

○ Consolidated Demolition Plan

Refer to Calder Flower Drawing No. A003 Consolidated Site Demolition Plan.

This Plan identifies buildings to be demolished in each Stage. The staging has been planned to provide the most efficient development program with the least disruption to existing and future residents of Harbison Care.

- Details of vegetation to be retained or removed

Refer to the plans prepared by Chris and Charlotte Webb.

A detailed audit was undertaken which confirms that the site currently has 365 individual trees. The tree removal plan contains a detailed index of the 73 trees to be removed. This is considered to be a very low proportion of tree removal for this scale of redevelopment and will be offset by the proposed landscaping strategy that will result in a more unified landscape outcome that will mature overtime with the new built form.

- Drainage Strategy

Refer to report from John Algie of A&R Engineering

- Comparison of existing and proposed density of the site

Refer to Calder Flower Drawing No.DA007 Existing Site Coverage and DA008 Proposed Site Coverage

This issue has been addressed by providing an analysis of two key criteria.

Firstly, we have analysed density as a measure of site coverage. This provides an insight into the total area of the site occupied by buildings, which is important in how members of the public perceive the density of the development on the site. The Calder Flower plans show that the existing site coverage stands at approximately 29%, a very low figure, increasing to approximately 47% at full master plan development. While this is a higher figure, it remains a very modest scale of development as evidenced by the generous landscape areas and generous setbacks to boundaries and building separation distances.

In terms of Part 7 Divisions 2, 3 and 4 of the Seniors SEPP, density and scale is expressed in various ways for the different types of seniors housing. For RCF and Hostels it is expressed as a Floor Space Ratio of 1:1. For ILU it is expressed as a Floor Space Ratio of 0.5:1.

If these standards are complied with, then density and scale of development cannot be used as a reason for refusal.

Because we are dealing with a concept master plan application, final floor space ratio figures are not yet known. However it is clear from the plans that development of a mixture of one and two storeys as is proposed will not exceed these figures. A condition of consent could be imposed upon any approval, if it was deemed necessary, that subsequent stages continue to demonstrate compliance with maximum site coverage and floor space ratio controls, with the final Stage 4 Development Application providing a whole of site calculation to demonstrate compliance to Council satisfaction.

The second density criteria is based upon the number of beds and/or dwellings provided on site pre and post development. The following Table provides this comparison.

Type of facility	Existing beds/dwellings	Proposed beds/dwellings
Dementia units	0	28 beds
Nursing Home 1	78	78 beds
Nursing Home 2	0	72 beds
Hostel assisted living	93	72 beds
Independent Living Units (Affordable Living)	0	20 dwellings
Independent Living Units	45	32 dwellings
Total	216	302 beds/dwellings

This represents a modest increase of 79 beds and 7 dwellings across the entire site. The capacity of the site to accommodate this increase can be seen in the maintenance of large open space areas, generous setbacks to boundaries and between buildings on site, an abundance of on site car parking spaces and the lack of impact upon the local road network.

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- Demonstration of solar access to buildings within the site

Refer to Calder Flower Drawings No. A016 Site Existing Shadows and A017 Site Proposed Shadows. Both drawings show June 21 at 9am, 12 noon and 3pm and December 21 at 9am, 12 noon and 3pm.

The Seniors SEPP requires the design of development to provide adequate daylight to the main living areas for residents and neighbours. (Clause 35) The submitted plans indicate that this is achieved. There are no overshadowing impacts on any neighbouring properties and the building orientation and building separation distances proposed will ensure a high level of amenity for future residents.

- Delineation of stages by precinct

Refer to Calder Flower Drawings A004, A010, A011, A012, A013.

These drawings clearly delineate the various stages of development, including the buildings to be demolished.

- Construction Management Plan

Refer to Calder Fowler Drawing A003 Consolidated Site Demolition Plan and Drawing No. A005 Construction Management Plan.

These plans show the location for construction traffic to enter the site, materials storage on site and location of proposed sediment controls. The Stage 1 car park is ideally suited to on site parking for trade vehicles to avoid any parking upon Charlotte Street (Note that Council has authorised No Parking on Charlotte Street between Moss Vale Road and the main Harbison entrance). Subsequent stages of development, which will require separate Development Applications, will be supported by Construction Management Plans appropriate to those stages.

- Overall Traffic and Parking Plan

Refer to Calder Flower Drawing No. A006 Traffic and Parking Plan.

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In terms of traffic, the upgrade to Park Road will provide access to the site for the majority of movements, in particular for service related vehicles. The

construction of this road has not been objected to by the RMS who have in fact previously commenced the process of making this available to Harbison Care. This process is ongoing.

The Traffic Assessment report from Colston Budd Rogers & Kafes that was submitted to support the Development Application has analysed the critical intersection of Moss Vale Road and Charlotte Street and found it to operate at a satisfactory level of service following full development of the site.

In terms of on site car parking the Calder Flower Drawing shows the total number of proposed on site car parking spaces to be 263 which is a very significant increase on the existing number of on site spaces. This number is considered to be well in excess of any minimum requirement of the Seniors SEPP.

Part 7 of the Seniors SEPP sets out standards that if satisfied, cannot be used for grounds of refusal. In relation to car parking the following clauses are relevant.

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

- (d) **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
 - (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.

49 Standards that cannot be used to refuse development consent for hostels

- (d) **parking:** if at least the following is provided:
- (i) 1 parking space for each 5 dwellings in the hostel, and
 - (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.

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

(h) parking: if at least the following is provided:

- (i) 0.5 car spaces for each bedroom where the development application is made by a person other than a social housing provider, or*
- (ii) 1 car space for each 5 dwellings where the development application is made by, or is made by a person jointly with, a social housing provider.*

The above requirements matched against the proposed development, reveals the following car parking demands:

Dementia 28 beds = 2 spaces

Residential Care Facility 150 beds = 15 spaces

Hostel 72 beds = 15 spaces

Independent Living Units 52 units x 3 beds each unit (156 beds) = 78 spaces

Ambulance spaces = minimum 2 spaces

Total spaces required = 110 spaces

Plus staff at maximum rate of 70 at any one time = 35 spaces

Total spaces required = 145 spaces.

With reference to the Calder Flower Drawing No. A006, the development proposal has 263 spaces on site. By any measure this is a significant number of on site spaces and will ensure that car parking demand is appropriately catered for on the site and well in excess of the Seniors SEPP requirement. This will reduce any pressure for on street parking on Charlotte Street. As can also be seen from Drawing A006, the on site spaces are well distributed across the site, both at grade spaces and within new basement parking areas. This ensures that parking is suitable for residents, visitors and staff alike.

We trust that this comprehensive response adequately addresses the concerns raised by the Joint Regional Planning Panel and we look forward to the matter being progressed.

Yours faithfully

Scott Lee
6 April 2017