

25 May 2018

15623

George Bramis
General Manager, Shaping Waverley
Waverley Council
55 Spring Street, Bondi Junction NSW 2022

Attention – Tim Sneesby

Dear George

**RE: RESPONSE TO COUNCIL MEETING
WAR MEMORIAL HOSPITAL, 125 BIRRELL STREET, WAVERLEY**

This response and additional information has been prepared by Ethos Urban on behalf of Uniting in relation to a meeting held with Waverley Council (Council) on 14 February 2018 to discuss the active Planning Proposal for the War Memorial Hospital at 125 Birrell Street, Waverley (the site).

This response seeks to address the issues raised by Council at the meeting and the Planning Proposal more broadly.

Uniting remain committed to working in collaboration with Council to ensure the desired future character and intended outcomes for the site are achieved. Uniting and their project team have worked hard to address the issues raised as well as demonstrate the need for an appropriate degree of flexibility in the site's controls to ensure future design and functional requirements can be met.

This response should be read in conjunction with the following supporting documentation appended to the report:

- Supporting Elevations prepared by Cox (**Attachment A**);
- Heritage Statement prepared by Hector Abrahams Architects (**Attachment B**); and
- Traffic Statement prepared by Traffix (**Attachment C**).

1.0 Background

A proponent lead rezoning application (Planning Proposal) was prepared and lodged by Ethos Urban (formerly JBA) on behalf of Uniting for the site to facilitate its future staged redevelopment. The key milestones of the Planning Proposal to date are as follows:

- 4 July 2017 - Planning Proposal lodged with Council.
- 17 August 2017 - Council request for additional information.
- 8 September 2017 - Initial meeting with Council.
- 19 January 2017 - response to request for additional information submitted to Council.
- 14 February 2018 - second meeting with Council.

The Planning Proposal lodged with Council sought the following amendments to the *Waverley Local Environmental Plan 2012* (WLEP 2012):

- Rezone the site in its entirety to R3 Medium Density Residential from part SP2 Infrastructure (Health Service Facility) and part R3 Medium Density Residential;
- Increase the maximum building height from part 9.5m and 12.5m to part 15m, 21m and 28m;
- Increase the maximum permissible floor space ratio (FSR) from part 0.6:1 and 0.9:1 to 1.5:1; and
- An amendment to Schedule 1 to permit development for the purpose of business premises, food and drinks premises, function centre, retail premises and tourist and visitor accommodation.

2.0 Formal Amendment to the Planning Proposal

A formal amendment to the Planning Proposal is sought following discussion with Council. The lots detailed in **Table 1** and identified in **Figure 1**, are now proposed to be included within the land that is subject to this Planning Proposal. Uniting has acquired a number of these properties and remains in regular communication with the owners of the remaining lots. Uniting will seek to acquire the properties not in their ownership when they become available.

Table 1 - Lots proposed to be included within the Planning Proposal

Address	Lot	DP	Ownership
99 Birrell Street	1	1115332	Private
101 Birrell Street	2	515904	Private
103 Birrell Street	1	515904	Uniting
105 Birrell Street	A	437866	Private
107 Birrell Street	B	437866	Uniting
109 Birrell Street	1	961790	Uniting
111 Birrell Street	11	667554	Uniting
113 Birrell Street	4	520982	Uniting
115 Birrell Street	3	520982	Private
117 Birrell Street	2	212655	Private
119 Birrell Street	1	212655	Uniting
121 Birrell Street	A	317831	Uniting





-  Land subject to Planning Proposal
-  Lots proposed to be included in the Planning Proposal

Figure 1 – Revised site plan

Source: Ethos Urban and Nearmaps

3.0 Schedule 1 Amendments

Council staff indicated they do not support the blanket rezoning of the site to R3 Medium Density Residential. An alternative, which still gives effect to the Planning Proposal would be an amendment to Schedule 1 of the WLEP 2012. A list of uses proposed under Schedule 1 is provided in **Table 2**.

It is noted that the current zoning of the site may give rise to future issues of permissibility. Uniting seeks to ensure the development potential across the site, including the lots in **Section 2.0**, is the same irrespective of the split zoning. This will ensure that future development is not unduly constrained to particular portions of the site.

Table 2 - Proposed uses under Schedule 1 for each existing zone

Existing SP2 Zone		Existing R3 Zone	
Permitted	Proposed under schedule 1	Permitted	Proposed under schedule 1
Roads; Health service facility and any development which is ordinarily incidental or ancillary to health service facility;	Attached dwellings; Bed and breakfast accommodation; Boarding houses; Building identification signs; Business identification signs; Centre-based child care facilities; Community facilities; Group homes; Home industries; Kiosks; Markets; Multi dwelling housing; Neighbourhood shops; Places of public worship; Respite day care centres; Roads; Seniors housing; Business premises; Food and drinks premises; Function centre; Retail premises; Residential Flat Building; Tourist and visitor accommodation;	Attached dwellings; Bed and breakfast accommodation; Boarding houses; Building identification signs; Business identification signs; Centre-based child care facilities; Community facilities; Group homes; Home industries; Kiosks; Markets; Multi dwelling housing; Neighbourhood shops; Places of public worship; Respite day care centres; Roads; Seniors housing;	Roads; Health service facility and any development which is ordinarily incidental or ancillary to health service facility; Business premises; Food and drinks premises; Function centre; Retail premises; Tourist and visitor accommodation;

4.0 Height

The proposed heights across the site have been revised to respond to the concerns of Council. The revised heights aim to ensure the site's future development is sympathetic to the heritage items on the site, and the heritage items and built form which surround the site, while aiming to deliver improved health facilities and seniors housing for the community.

The revised heights across the site, compared to the initial heights lodged with the Planning Proposal is detailed in **Figure 2** and **Figure 3**.

Cox have also prepared a number of sections which compare the now proposed heights and the heights suggested by Council officers against the indicative masterplan. Areas where the indicative masterplan would depart from Council's preferred heights is shown in **Attachment A**.

The proposed heights take into account the site's natural topography and the functional requirements of Uniting and provide an appropriate outcome for the site.

The sections demonstrate how development responds to the natural topography and respects the site's existing heritage buildings, Norfolk Pines and adjoining development.

The sections indicate the separation distances made possible by the size of the site, how the site can appropriately manage the heights proposed and the functional requirements required by Uniting, without generating any unacceptable impacts to heritage buildings and the surrounding built form, and would avoid the need for ongoing variations to the Height of Buildings development standard that would be required if the heights suggested by Council were adopted.

Part of the rationale of the Planning Proposal is to set appropriate development standards for the site to avoid the need to vary standards in future development applications.

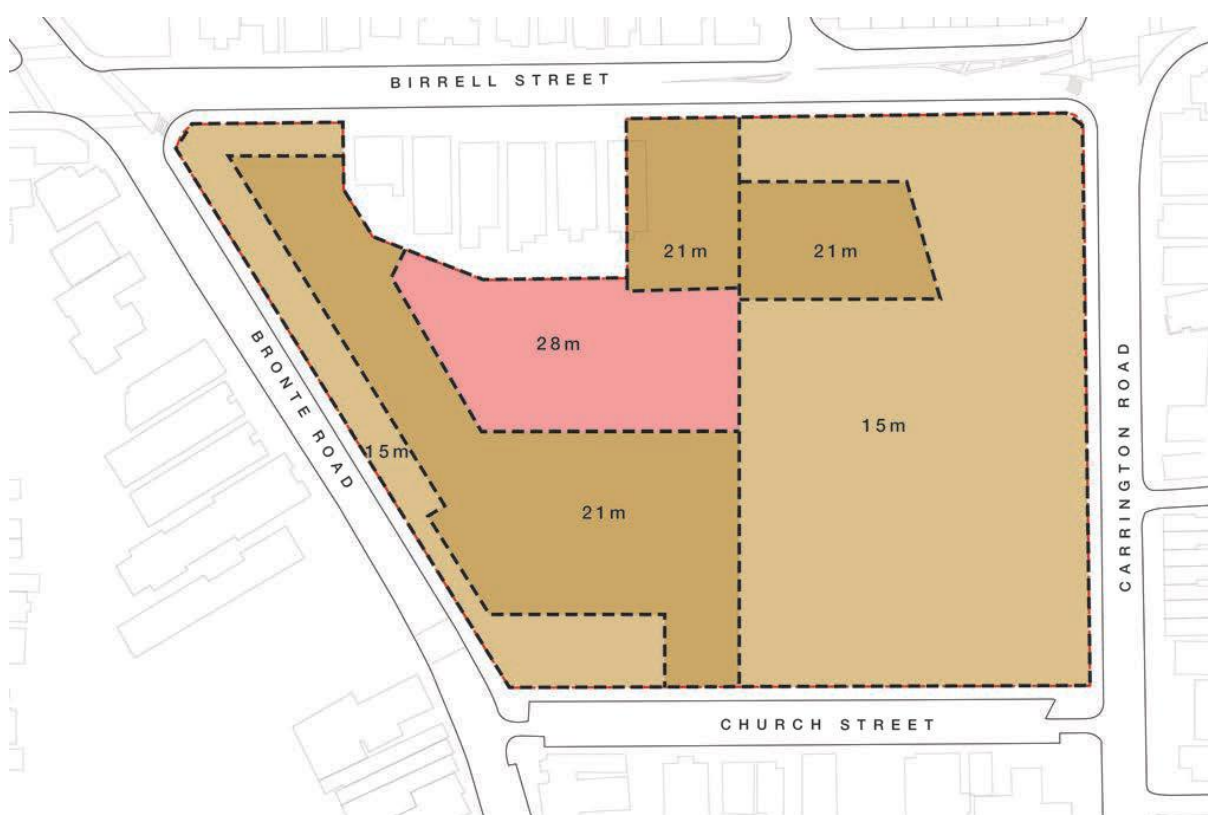


Figure 2 - Building envelope and heights lodged with the Planning Proposal

Source: Cox

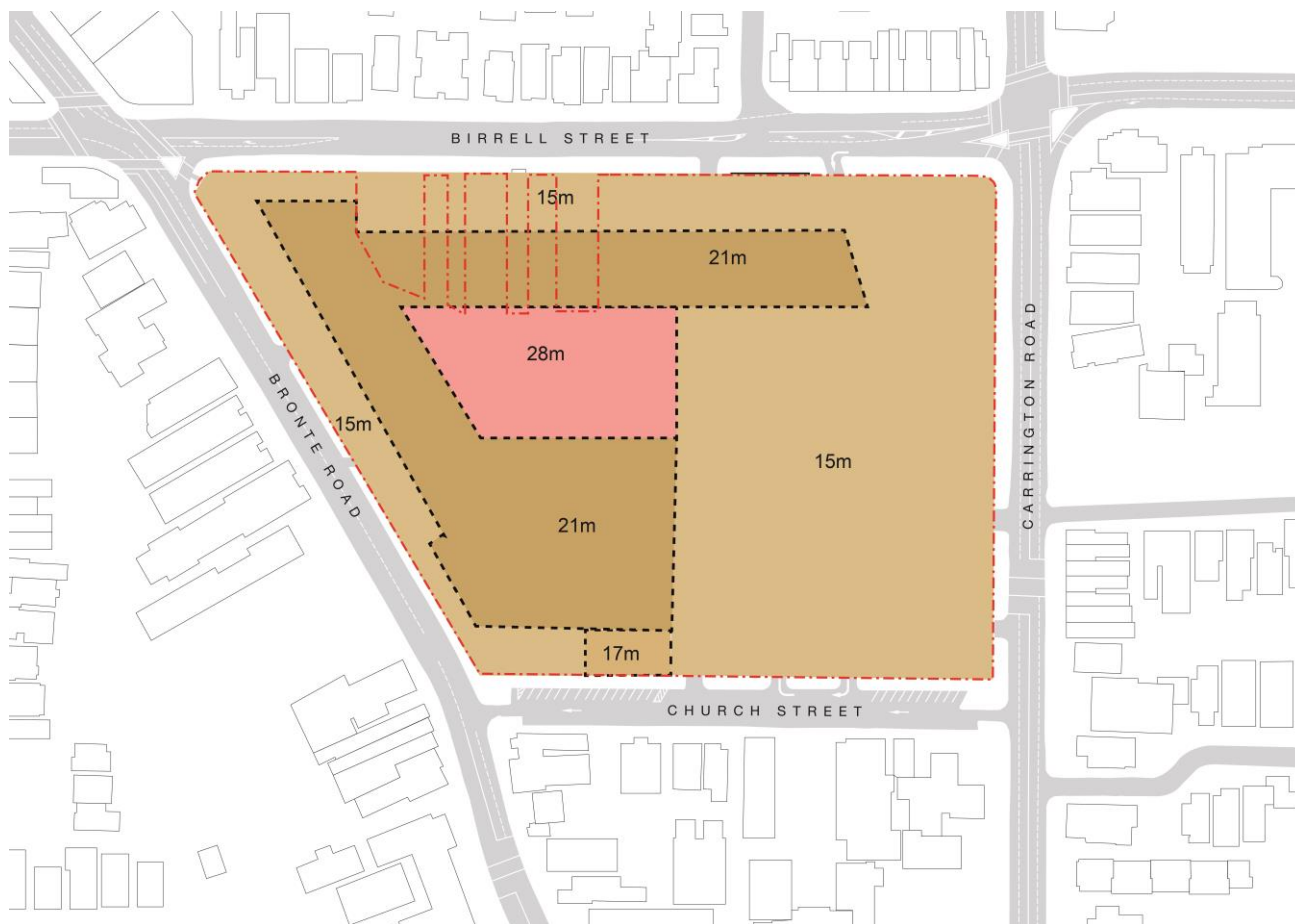


Figure 3 - Revised building envelope and heights

Source: Cox

Figure 3 identifies the following changes to the proposed heights and envelopes. Each change is elaborated in detail below.

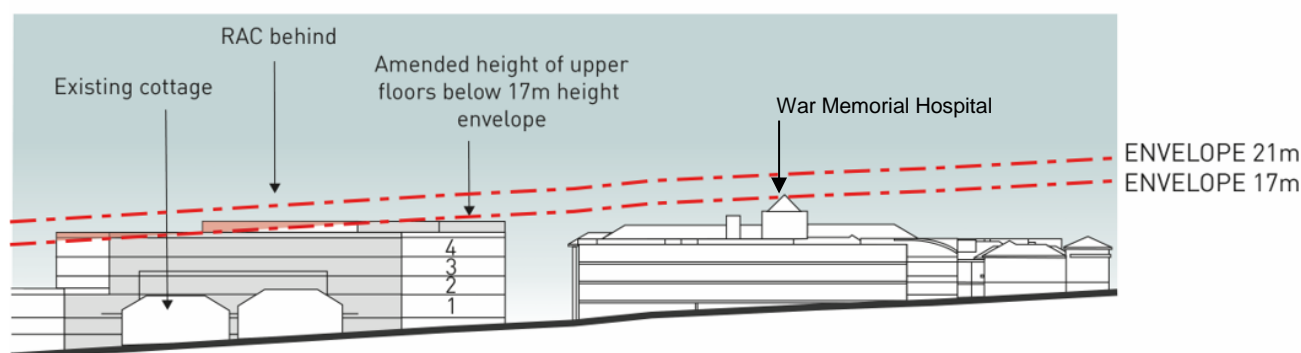
- Reduced maximum building height at the Church Street frontage from 21m to 17m;
- Removal of the 21m maximum height zone on Birrell Street to give a consistent 15m height along the length of Birrell Street; and
- Reduce the area of the 28m-height zone.

4.1 Reduced maximum building heights at the Church Street frontage

The portion of the 21m height zone which fronts Church Street is proposed to be reduced to 17m. The provision of 17m is considered suitable as it provides a height capable of accommodating four standard residential floors to suit a Residential Aged Care Facility (RAC). Importantly, 17m would still enable sufficient height in the lower levels for good amenity for common areas. Reducing the height below 17m would compromise the configuration of the RAC building in the indicative masterplan and would affect the viability of this facility.

The reduction in height will also improve the interface with Church Street. Specifically:

- It will reduce the overall bulk and scale of development immediately adjoining the street front, allowing a sympathetic transition of development into the site;
- Improve the heritage interface with the existing heritage listed federation style detached residences at 2-8 Church Street, in particular when looking east from the corner of Church and Bronte Road; and
- Would provide a transitioning of height when viewed from Church Street (refer to **Figure 4**). Having four residential floors to a height up to 17 metres, would enable a future building to have a height consistent with the War Memorial Hospital (Morgan) Building, following the natural topography of the site, down the slope to the west.



UNITING PROPOSAL CHURCH STREET SECTION

Figure 4 - Potential Future RAC building with 17m fronting Church Street

Source: Cox

4.2 Removing the 21m maximum height zone on Birrell Street

Introducing a consistent 15m height zone along Birrell Street with a narrower 21m height zone behind it will limit the ability of high buildings to protrude close to the Birrell Street frontage. It will also ensure that Ellerslie House, located in the north-eastern portion of the site, has an appropriate heritage interface with future development.

Ellerslie House, at the Birrell Street frontage, has a maximum ridge height by survey of 109.17 AHD. Under the indicative masterplan, the building directly adjacent Ellerslie House (refer to **Figure 7** in **Section 6.2**) is proposed with a maximum height of (to top of roof projections) 109.40 AHD. The numeric height variation of 0.23m is considered nominal in nature, and does not diminish the heritage significance of Ellerslie House.

It is noted that Ellerslie House is setback 1m from Birrell Street. A 4m setback is proposed for the adjoining development with a further setback of 12m for the upper levels. The retention of sightlines to Ellerslie House, provided by the proposed 4m setback, will ensure its heritage significance is retained (refer to **Section 6.2**).

Further, the amended 21m height zone will result in development of a more elongated form which is consistent with the Edina (Vickery) Building and Morgan Building, both of which are long and narrow. The elongated 21m height zone is positioned directly north of the site's central lawn space. Along with the Edina and Morgan Building, development in the 21m height zone will demarcate and frame the central lawn space, consistent with the historic layout of the site.

This building arrangement is consistent with the following policies within the Conservation Management Plan prepared for the site and lodged with the Planning Proposal:

- Policy 10 whereby *the siting of the new buildings continues to respect the integrity of the estate, its orthogonal and picturesque layouts, and historic sequence of spaces*; and
- Policy 11 whereby *the scale of new buildings should be of a scale consistent with the estate*.

4.3 Reduced 28-metre height zone

The 28m height zone has been reduced in area to better align with the above changes, namely the removal of the 21m height zone along Birrell Street to give a consistent 15m height zone along this frontage. The 28m height zone will remain within the middle portion of the site where higher buildings will have little impact on the surrounding streetscape. Future development at the perimeter of the site will affectively obscure development in the 28m height zone when viewed from the street. The site's natural topography will further assist in moderating the perceived height of any development within this zone from the surrounding urban form (refer to **Section 6.4**).

5.0 Floor Space Ratio

The Planning Proposal seeks a maximum floor space ratio (FSR) of 1.5:1 across the site. This FSR is still considered the most appropriate FSR for the site and provides an appropriate degree of flexibility to Uniting, commensurate to this stage of the planning process.

Council have suggested that an FSR of 1.2:1 is more appropriate. This is based on an assessment of the indicative built form shown in the masterplan. The indicative built form is not a resolved design from which a floor space ratio could or should be calculated. The masterplan is indicative only, open to change, and seeks only to illustrate one potential way to redevelop the site in-line with the controls proposed under the Planning Proposal.

As such, the indicative masterplan should not be considered the standalone factor in determining an appropriate FSR for the site, especially as Uniting are in the process of acquiring additional properties along Birrell Street (refer to **Section 2.0**).

An FSR of 1.5:1 is considered appropriate for the site given the opportunities it presents and the suite of uses proposed. Specifically:

- The site is located in close proximity to Bondi Junction, a major centre with a full range of support facilities. The site is well connected to this centre by public transport which is also a short level walk from Bronte Road. The proposed FSR is also consistent with the range of maximum FSR's found around the fringe of Bondi Junction, including along Bronte Road to the north which has a maximum FSR of 2:1.
- The FSR will allow an appropriate scale of development, incorporating existing site uses with compatible additional supporting uses.
- The FSR allows appropriate flexibility within the principles of the indicative masterplan without causing future incremental applications if a lower FSR was shown to be capable of being exceeded within the proposed form, due to efficient design.
- As detailed above, the proposed masterplan scheme is indicative only.
- The envelopes currently proposed can be accommodated within an FSR of approximately 1.5:1.

- The site has increased in area (refer to **Section 2.0**). It is a generally accepted planning principle that larger sites can accommodate higher FSR's without having adverse or unacceptable impacts. An FSR of 1.5:1 is considered appropriate to the size of this site.

6.0 Heritage

A detailed response to each heritage concern has been considered and addressed by Hector Abrahams (refer to **Attachment B**).

6.1 Carrington Road

Council correspondence states:

Carrington Road is a significant heritage streetscape, therefore any future buildings in the streetscape should relate to the scale of the heritage buildings on the site.

Response

The Carrington Road frontage will be subject to little redevelopment and contains significant existing development that will be retained. This development forms part of the local heritage listed War Memorial Hospital, Late Victorian Buildings and Former Stables (item no. 1449). Specifically, the existing streetscape comprises:

- A two-three storey building at the corner of Carrington and Birrell streets, being the Hunter Lodge;
- The Edina (Vickery) Building;
- Large trees with extensive canopy in front of the Chapel; and
- The two storey former stables and laundry building set to the boundary at the corner of Church Street.

The Carrington Road streetscape is not uniform and continuous. It represents the multiple layers of history of the site, commencing with the original estate as well as later elements. The streetscape is not a uniform wall of buildings, having various setbacks and revealing both hard-paved courtyards and tree-covered garden landscaping. It is evident from most viewpoints along Carrington Road and adjacent streets that the interior of the site and even most of the tall pines, are not visible from the Carrington Road frontage or further to the east. The Edina Building effectively screens the interior garden from the Carrington Road frontage, even though the pines are considerably taller. This is consistent with the original concept of the site as a private garden facing to the west with the residence as a backdrop.

Retaining the existing development along the Carrington Road street front will ensure the retention of the streetscape character. From viewpoints directly in front of the site along Carrington Road, the new taller buildings will generally not be visible (refer to **Figure 5**). Only at oblique points further south and at the Birrell Street intersection will the silhouettes of new buildings be partially revealed (refer to **Figure 6**).

Figure 6 shows the proposed levels from the Carrington Road / Birrell Street intersection, will be consistent with (114 AHD) or lower than those existing. The distance these parapets are setback from Carrington Street and the natural fall of the site, will act to further reduce the perceived heights of the envelopes.

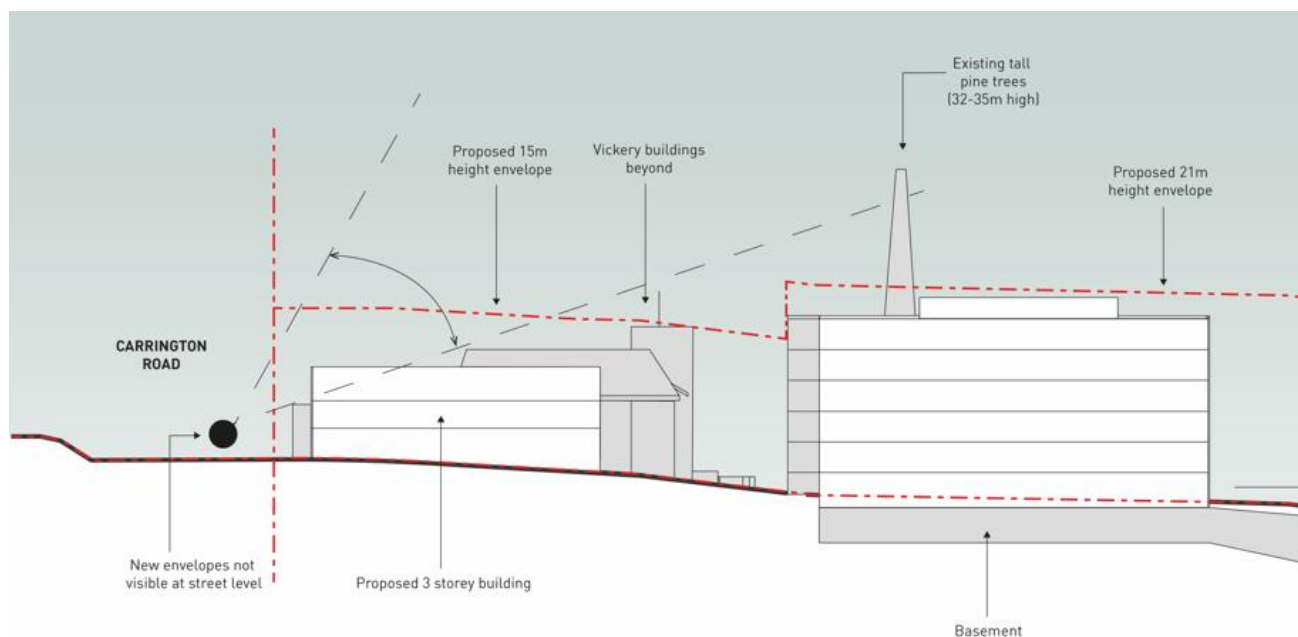


Figure 5 – Section A (looking south)

Source: Cox



Figure 6 – Photomontage of development from Carrington Road / Birrell Street corner

Source: Cox

6.2 Church Street

Council correspondence states:

Built form must respond to the existing heritage items in the streetscape including those at St Claire's College. New buildings on this street should be considered secondary and enhance the heritage items rather than dominating the streetscape.

Response

Church Street has a character dominated by several tall church and school buildings on the southern side with steep roof forms which project close to the street boundary. Other lower residential dwellings have varied and greater setbacks. The view from either end of the street reveals a punctuated built form alignment and height, in which several tall roof forms with ridge lines perpendicular to the street dominate the view. The street front also contains courtyard areas which form entry points to the school sites. The open spaces allow lateral vistas of the taller church and school buildings.

The approach to the RAC building under the indicative masterplan along the western portion of Church Street is considered consistent with the streets existing heritage items and streetscape. The proposed building forms and upper level setbacks will provide a rhythmic expression along the streetscape rather than effecting a continuous frontage.

As detailed in **Section 4.1**, the RAC building has been reduced in height by adjusting podium levels and floor-floor levels of upper accommodation floors. This allows a scheme with the same mix of uses to be accommodated in a lower height envelope. Floor-to-floor heights have been reduced by assuming lower ceiling levels and service voids but maintaining residential ceiling heights.

The reduced height of the RAC ensures a building height consistent with the existing War Memorial Hospital. Assisted by the topography of the site, this ensures a consistent height transition of tall buildings along Church Street contributing to the existing heritage streetscape (refer to **Figure 4**).

Providing a stepped height control of 17m to 21m places the majority of any future development in from the Church Street frontage, reducing the bulk of development directly along Church Street and improving the heritage interface with the existing heritage buildings on the corner of Bronte Road and Church Street.

The tall central roof of the War Memorial Hospital (Morgan Building) will continue to dominate as the highest element along Church Street. The central entry to the Morgan Building will be retained and celebrated, while being supported by an enlarged entry from Church Street. Currently the Morgan Building offers little engagement with the Church Street frontage and presents poorly with service yards and maintenance areas facing the street. It is proposed to replace these with the enlarged hospital entry and engage the street with more engaging façade treatments, and landscaping. The heritage-listed elements on the street frontage will be retained and integrated with new building forms.

6.3 Birrell Street

Council correspondence states:

Due to the large number of heritage terraces, single dwellings and medium density flat buildings in this streetscape, the existing 12.5m maximum building height should be retained along this frontage. Any development on this frontage should be no higher than the ridge of the adjacent heritage building (RL 109.17) and anything above the height of the primary eaves should be set back or articulated to respond to the neighbouring heritage item.

Response

Ellerslie House is located along the Birrell Street frontage with a ridge height of 109.17 AHD. This approximates an effective height of 12m. The building envelope proposed under the masterplan directly adjacent of Ellerslie House is proposed with a maximum height of 109.40 AHD (refer to **Figure 7**). The numeric height variation of 0.23 ADH is

considered nominal in nature, is not discernible from any view point at ground level and having no impact on the heritage significance of Ellerslie House.

It is noted Ellerslie House is setback 1m from Birrell Street. A 4m setback is proposed for the adjoining development with a further setback of 12m for the upper levels. The retention of sightlines to Ellerslie House, provided by the setbacks proposed, will ensure the envelope does not overwhelm the streetscape, or the heritage significance of Ellerslie House.

The benefit of the substantial upper level setback is to reduce the perceived scale of the buildings along the street frontage. Birrell Street, which falls some 16 metres along this frontage, will continue to give prominence to the heritage buildings at the higher end of the street.

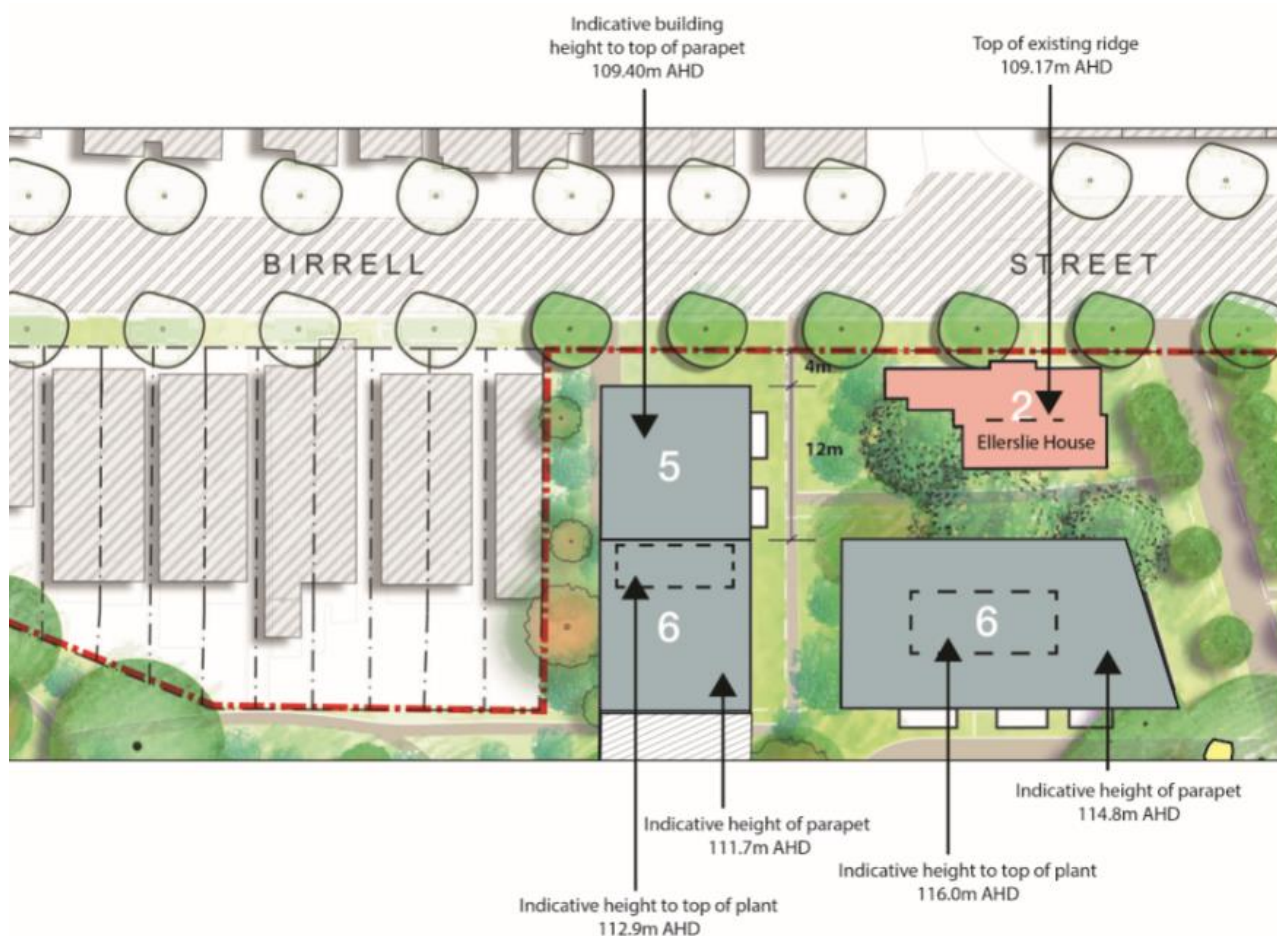


Figure 7 – Proposed Birrell Street setbacks in relation to Ellerslie House

Source: Cox

6.4 Height

Council correspondence states:

All proposed heights – 28m, 21m and 15m challenge and overwhelm the landmark qualities of the Edina (Vickery) tower and Norfolk Island Pines and are not consistent with the scale of the estate.

Response:

The 28m maximum building zone is located deep within the lower portion of the site where it is considered appropriate for higher building elements by using the site's natural topography. This is best illustrated in **Figure 8**. Future development within the 28m envelope, will have a lowered ground level than much of the site, and the Vickery Building and Norfolk Pines in particular.

Any future building within the 28m zone will be more than 62m from the Vickery Building and more than 40m from the nearest Norfolk Pine (refer to **Figure 8**)

The Norfolk Pines are in the order of 32-35m high, perched on the higher part of the site, closer to Carrington Road. They sit on ground levels of approximately 94.4 / 94.8 AHD. The 28m height zone is located on ground levels, at their lowest point, 90 AHD. Hence the 28m envelope represents a 24m height relative to the Pines.

The combination of their height and location, as well as their physical separation from any future 28m high buildings means that the heritage significance of the pines, as well as the Vickery Building, will be maintained.

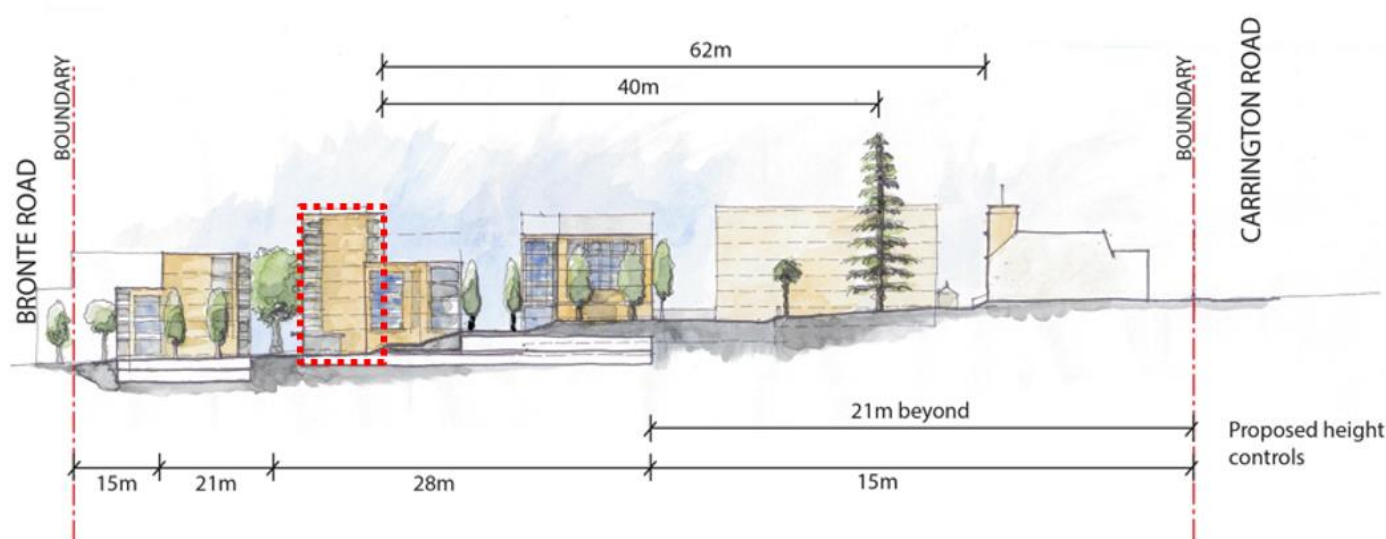


Figure 8 – Bronte and Carrington Road cross section (28m / 6-8 storey building in red outline)

Source: Cox

The revised 15m and 21m heights on the western portion of the site, fronting Bronte Road are not considered to overwhelm the existing Vickery Building and Pines. Again, this is through a significant physical separation and the change in ground level (refer to **Figure 8**).

The 21m maximum building height zone is closer to the Vickery (Edina) Building and Pines than the 28m height zone, yet continues to provide an appropriate height relative to its position on the site. This is the result of deliberate design development. By giving this zone a greater setback from Birrell Street, new development will not overwhelm the Birrell Street streetscape. It also concentrates heights on the site in line with the existing larger buildings, including the Vickery and Morgan Building.

Development within the 21m height zone will reinforce the historical central lawn space, which historically has been surrounded by large buildings, as well as reiterating the dominant central axis of the Vickery Building through the site to Bronte Road (refer to **Figure 9**). This 21m maximum height zone assists in reconstructing the historical spatial relationship and estate planning for the site (refer to Policy 3 of the CMP). This height does not exceed the Norfolk Pines, ensuring their landmark qualities are retained when viewed from the vicinity of the site.

More broadly, the heights and envelopes proposed aim to accommodate all building elements inclusive of parapets, plant and lift overruns. The apparent height, bulk and scale of future development under the indicative masterplan would be considerably less than the envelopes might suggest as any future buildings will need to incorporate articulation and modulation in the building design. Providing for these appropriate heights allows for greater freeing up of the ground plane, providing more open space and building separation whilst providing for viable development options for health and seniors living.

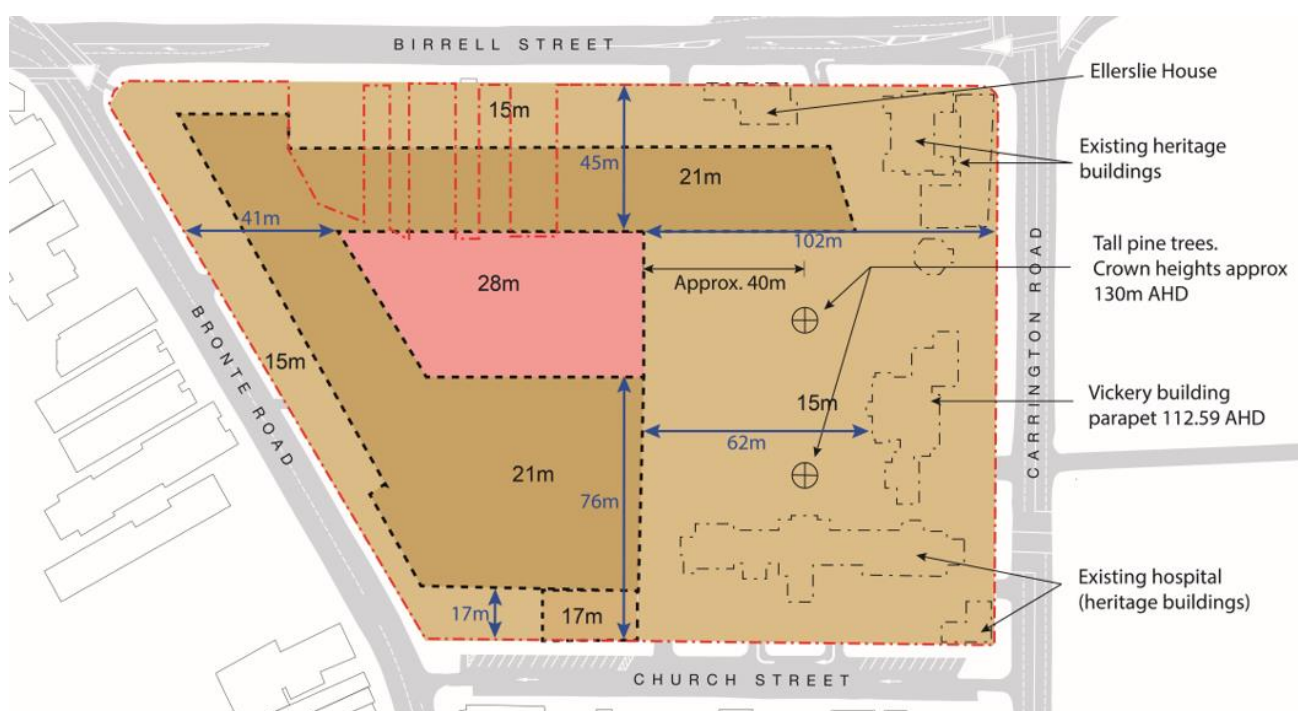


Figure 9 – Central axis of the Vickery Building to Bronte Road

Source: Cox

7.0 Residential Amenity

7.1 Bronte Road

Council correspondence states:

Existing building heights along Bronte Road increase on approach to the Bondi Junction commercial centre. The proposed 15m streetwall along the subject section of Bronte Road would create inconsistent built form in the streetscape as the adjacent building height controls are 12.5m.

Response

Development adjacent Bronte Road opposite the site is characterised by medium density development to four storeys. Whilst the current controls along Bronte Road are set at 12.5m, buildings opposite the site are stepped in height from 5 and 6 storeys (129-131 Bronte Road) and 4-storey developments (117-123, 93-99 Bronte Road).

The stepped apartments on the corner of Bronte Road and Birrell Street (129-131 Bronte Road) have a pitched roof with a ridge line at 101.73 AHD. The 15m height limit proposed for the Bronte Road frontage will generate a parapet level of approximately 100.4m AHD. These heights, within 1.3m, are relatively close and will be perceived as equal to the ridge height along Bronte Road, opposite the site (refer to **Figure 10**).

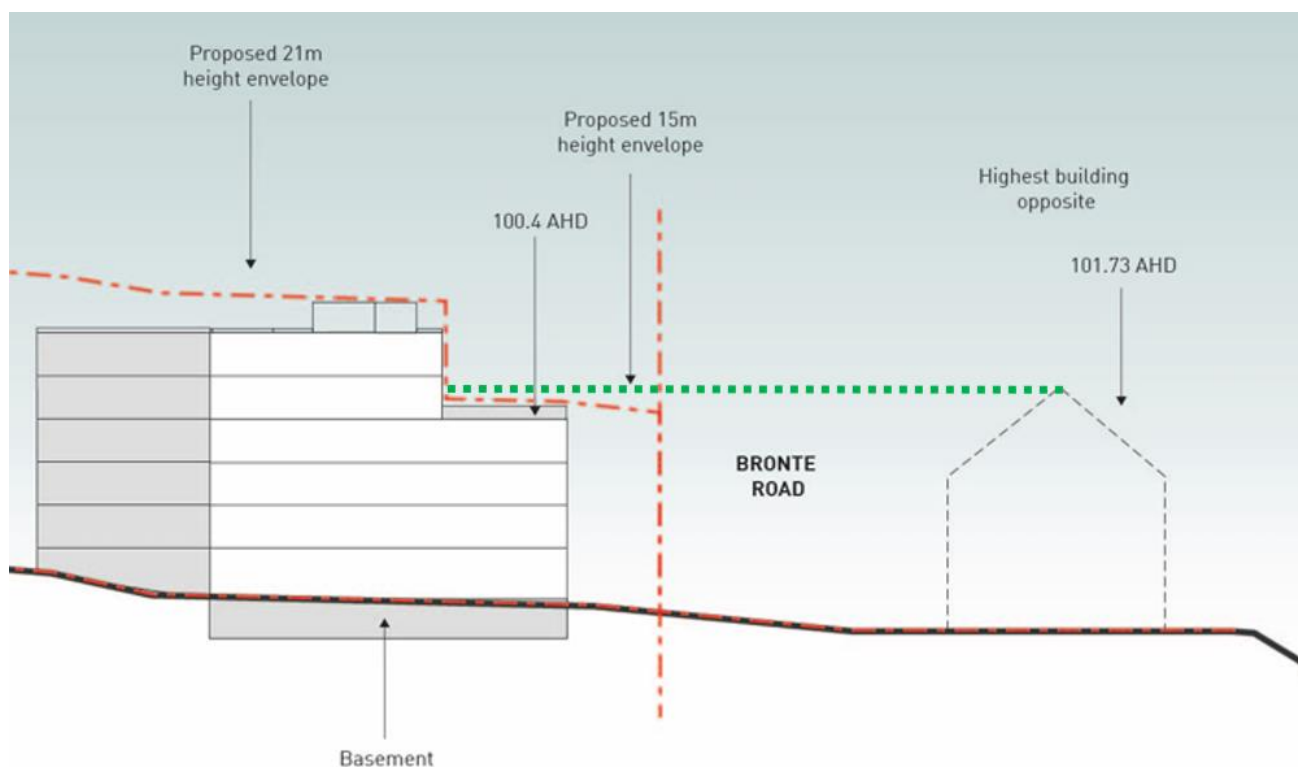


Figure 10 – Carrington / Bronte Road section (looking south)

Source: Cox

This demonstrates the height limit proposed, albeit above 12.5m, will produce a similar scale of development, generally consistent with the existing built form and streetscape, aligning with the high-density development provided for along Bronte Road.

122 Bronte Road, directly opposite the site, on the other side of Birrell Street, is the subject of a Planning Proposal in which increased height and density is sought. The building on this site (The Telstra Exchange Building) rises 18.5m. An increased height and or retained height of 18.5m would continue a suitable transition down to the 15m height proposed for the site and the overall height transition outward from Bondi Junction.

Design Analysis

From a design and amenity perspective, the impacts of the 15m and 21m heights from Bronte Road on the ILU's under the indicative masterplan have been further analysed by Cox (refer to **Figure 11** to **Figure 13**).

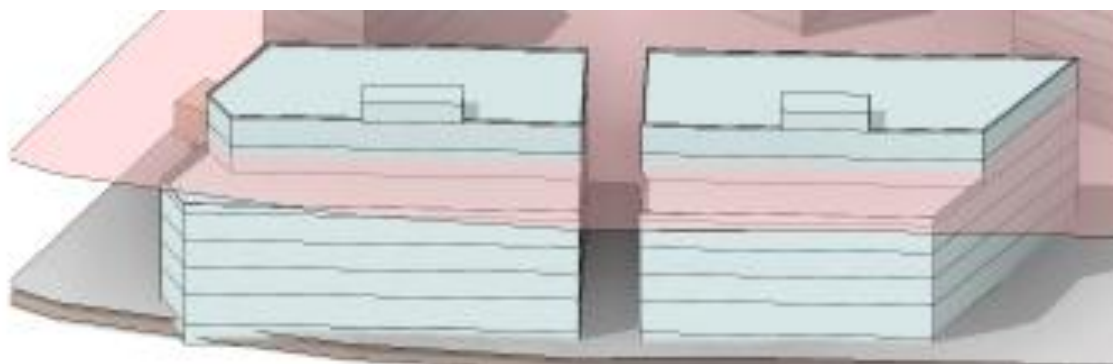


Figure 11 - 15m height plane

Source: Cox

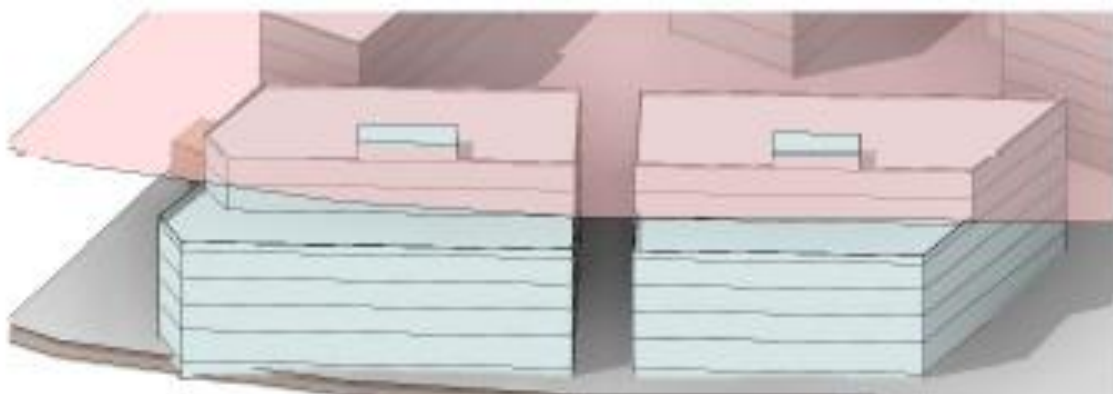


Figure 12 - 20m height plane

Source: Cox

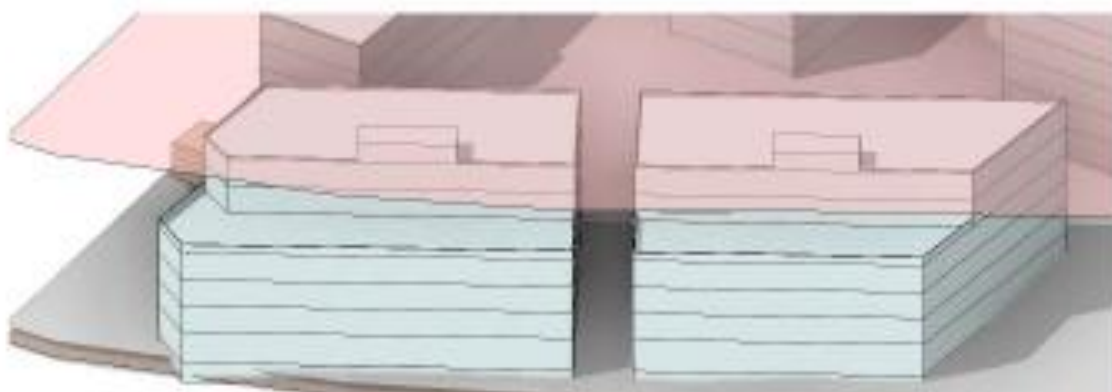


Figure 13 - 21m height plane

Source: Cox

The analysis concludes the following:

- The 21m height limit is capable of accommodating future development (at six storeys), inclusive of architectural detailing, parapet modelling and active roofscapes, in accordance with the architectural quality envisioned. It is considered the most appropriate height for this portion of the site to accommodate future development.
- A 20m height limit as suggested, does not accommodate a six-storey built form as upper portion roof elements would need to protrude through the maximum height plane (refer to **Figure 14**). Potential future non-compliance for such elements and Clause 4.6 variations would be contrary to the intent of the Planning Proposal which is to consider (amongst other things) the site-specific merit of controls in line with its potential future uses (refer to **Attachment A**).

Further, it is noted that:

- The heights of the buildings proposed along Bronte Road are located more than 50 metres from the Vickery Building and 35 metres from the existing Norfolk Pines and are also lower down on the site, reducing adverse impacts to their heritage significance.
- The proposed heights along Bronte Road and the site broadly, have been designed to accommodate a four-storey built form to the street with an additional two storeys and plant areas set back. This approach moderates building heights and bulk and how the building presents to the street.
- The stepped 15m height from 15m to 21m also achieves:
 - Suitable floor heights of 3100mm floor to floor, consistent with the Apartment Design Guide (ADG);
 - An appropriate balustrade height at the setback upper level to accommodate active out door roof terraces; and
 - Sufficient flexibility in the height of the ground floor to mediate the undulating site levels along Bronte Road whilst achieving equitable access. Creating a permeable and accessible site is a primary outcome Uniting is seeking and is discussed further below.

Permeability and Amenity

Providing appropriate permeability and amenity has been a significant driver for the 15m and 21m height along Bronte Road. These height limits provide for a flexible ground floor, enabling it to confirm to the ground levels along Bronte Road, to ensure level access for residents of future development.

Importantly, a height of 12.5m, as suggested by Council still would not enable this portion of the site to achieve a compliant four storey development with heights capable of accommodating a flexible ground floor. The 15m and 21m heights will provide flexibility and a high degree of amenity in design appropriate to the intended future users of the site (refer to **Figure 14**).

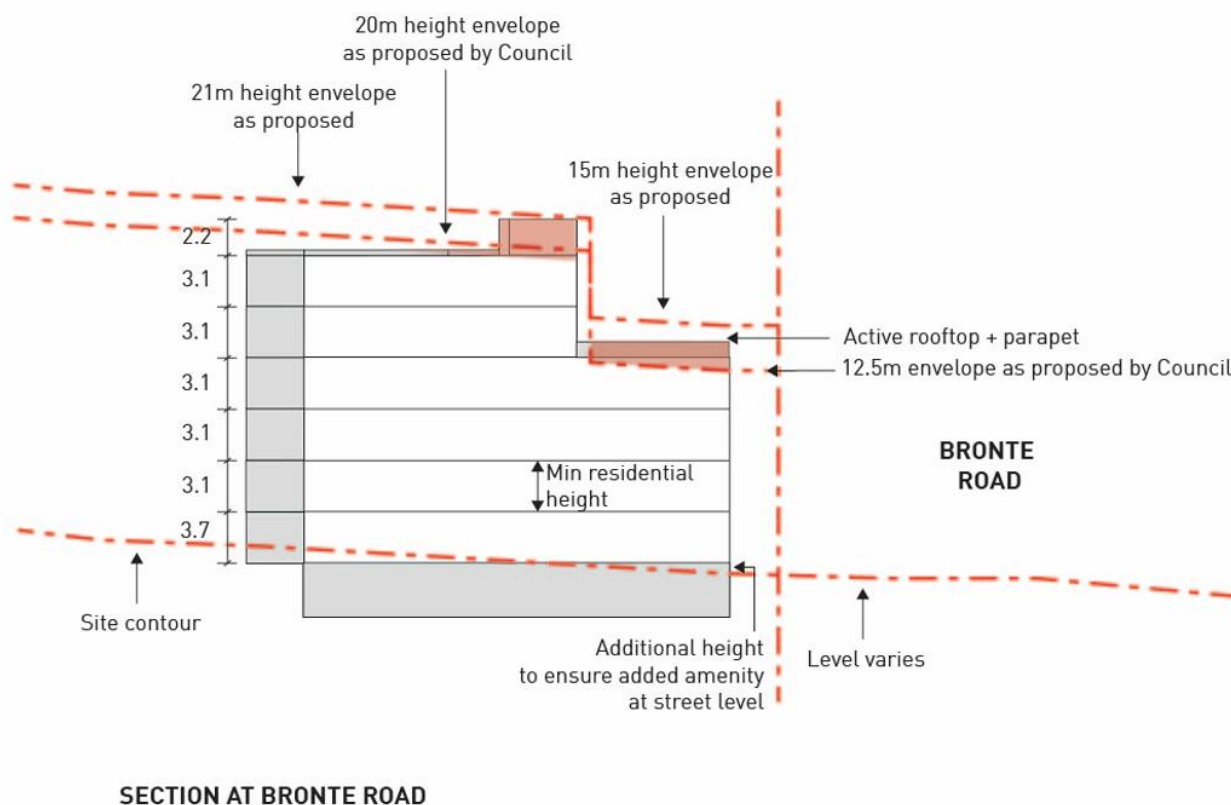


Figure 14 – Bronte Road section of ILU envelope

Source: Cox

7.2 Height

Council correspondence states:

The 28-metre building height control proposed in the application would have an adverse impact on the area and is not in context with the surrounding urban form or any expected future development in the vicinity. This height control reflects an 8-9 storey development which would be visually intrusive amongst the neighbouring 1-3 storey heritage dwellings. A more appropriate built form outcome for the centre of the site would be 4-5 storey buildings, reflecting medium density built form. Any development should be articulated to reduce the impact of bulk and scale on both the surrounding residential areas and the heritage buildings. The recommended height control for the centre of the site should be no greater than 20m.

Response

The 28m building height in the centre of the site, is considered suitable and appropriate as buildings of this height in this location would not generate any significant adverse impacts to the surrounding locality.

1. Positioning

The 28m building height zone is deliberately positioned within the central portion of the site. Specifically, this height control is setback:

- Approximately 32.9m (41m marked from oblique angle) from Bronte Road;
- 45m from Birrell Street;
- 102m from Carrington Street; and
- 76m Church Street.

Future development up to 8 storeys will not have any frontage to the street and is intended to be flanked on each side by new buildings. The physical separation of development from the street front alone will reduce the perceived height and scale of development, reflecting a more appropriate height compared to the surrounding urban form.

A distance of 80 and 102 metres is considered sufficient to minimise impacts of visual privacy and intrusion for existing development along Church Street and Carrington Road. As detailed below and in **Section 6.4**, any 8 storey developments will have a lower ground level than the upper parts of the site, further reducing the perceived height of development.

The height of development will gradually increase from the mostly 15m proposed along the Church Street and Bronte Road frontages, enabling these more sensitive frontages to accommodate lower heights (generally four storeys), representing an appropriate and thoughtful response to neighbouring dwellings.

The central positioning of the 28m will ensure any adverse impacts such as overshadowing, are contained within the site.

The 28m height zone, its deliberate positioning within the site, and the significant size and importance of the site to the community overall, reiterates the appropriateness of proposed building heights up to 8 storeys. Very few sites within the Waverley LGA would be more suitable, for the abovementioned reasons, in appropriately accommodating 8 storeys without adversely impacting the surrounding urban form while still providing significant community benefit. Development to a limit of 4-5 storeys for the central portion of the site would constitute an underutilisation of the site's potential.

2. Topography

As detailed in **Section 6.4** and **Figure 8** above, the natural fall of the site from Carrington to Bronte Road will assist in reducing the perceived scale of any 8-storey development.

3. Views

A View Analysis prepared by Cox and verified by Richard Lamb was submitted with the Planning Proposal. The view analysis demonstrates that any proposed taller buildings in the centre of the site would not have any significant degree of visibility from the street frontages, ensuring the existing character of those street frontages are retained.

The key view analysis from each street frontage is detailed in **Figure 15** to **Figure 17**. The 28m envelope is not visible from any of the below views.



Figure 15 – Montage of 15m and 21m envelope viewed from Birrell Street west of Bronte Road intersection

Source: Cox



Figure 16 – Montage of 15m and 21m envelope from Birrell Street

Source: Cox



Figure 17 – Montage viewed from Carrington Road looking west

Source: Cox

8.0 Transport

A Traffic Statement has been prepared by Traffix and is provided at **Attachment C**. The Statement addresses the key transport issues identified by Council in the Planning Proposal. The issues include:

- Reducing the number of crossovers from the site; and
- Achieving consistency with Council's strategic transport document *People, Movement and Places Strategy*, in particular in relation to an expanded Kiss and Ride zone along Church Street.

Each point is discussed below.

8.1 Crossovers

Seven cross overs are envisioned for the site under the indicative masterplan, many of which are currently in operation. The number of crossovers reflects the significant size of the site and the different combination and intensity of uses proposed. The primary objective is to ensure traffic generated from the site's redevelopment is evenly distributed to the existing road network.

The crossovers currently in operation are and are located in the following locations and illustrated in **Figure 18**:

- Centrally along Bronte Road;
- At the major entry point on Birrell Street, leading to the Vickery building, the garden and the Hospital;
- Further west on Birrell Street;
- Along Carrington Road at the rear of the Vickery Building;
- Along Carrington Road near the corner of Church St, proving services access;
- Mid-way along Church Street; and

- The existing individual allotments within the site which have many additional driveways.



Figure 18 – Location of existing crossovers

Source: Cox

Bronte Road

The existing access from Bronte Road is proposed to be retained under the masterplan. It aims to provide direct access to the north western portion of the site. This access is deliberate to reduce the need for vehicles to use the Church Street entry point, considered the primary entry point for the site and the need for vehicles to traverse the site. Reducing through site vehicular movements reiterates the fundamental design principles of the masterplan which seek to integrate and prioritise pedestrian movements across the site.

The entry point along Bronte Road will not generate adverse impacts to the surrounding road network. Currently, this entry services the existing ILUs. Under the indicative masterplan, this entry will continue to serve only the ILU's hence generating very low traffic volumes.

The use of multiple entry / exit options are available. This will limit the impacts on any one location and assist in preventing localised congestion due to external traffic sources.

Church Street

The crossovers proposed for Church Street will provide direct access to the southern portion of the site, as well as act as the site's primary access point. More than one entry point from Church Street is considered appropriate to

service the RAC, staff and guests, as well as loading. One cross over is proposed as a dedicated Porte Cochere, enabling a dedicated pick up and drop off area for the RAC, removing this activity from the street.

Carrington Road

Carrington Road is a regional arterial road which carries through traffic to Bondi Junction. No additional traffic will be generated along Carrington Road irrespective of the number of cross overs proposed under the access strategy within the masterplan, inclusive of the existing back of house access. Like the other entries proposed, these seek to enable direct access and servicing points to the portion of the site they serve.

Birrell Street

A single access point is proposed for Birrell Street. It is however proposed to be restricted to left turn entry only, stopping traffic build up generated from vehicles looking to turn right. This will provide an improved traffic outcome to that currently in operation.

8.2 The People, Movement and Places Strategy

An expanded Kiss and Ride zone along Church Street can be accommodated from a transport planning perspective. The functioning of the expanded zone however would be dependent on traffic flow along Church Street and a suitable number of cross overs for the site on the other street frontage (at least two distinct entry / exist points), ensuring traffic for the site is not forced to Church Street.

The portion of the site which would be primarily serviced by the Church Street entries relate to seniors housing, in particular the RAC building within the south western portion of the site. Seniors housing provides an excellent synergy with the surrounding school uses, each of which generate vehicular flows at different times of the day.

This synergy would be adversely impacted if traffic associated with other land uses for the site were required to use the Church Street entries. This would increase traffic during peak school periods and undermine the intent of the expanded Kiss and Drop zone.

As an aside, the onsite parking proposed for the site seeks to accommodate all residential, staff and visitor parking needs. This will reduce the demand for on street parking along Church Street and assist in the provision of an expanded Kiss and Drop zone.

9.0 Retail Cap

A retail cap is considered an appropriate mechanism for the site to ensure existing surrounding retails patterns remain unchanged, and that the retail uses proposed remain ancillary to the primary uses proposed. Accordingly, Uniting propose a retail cap of 450 square metres.

It is noted that the Planning Proposal and indicative masterplan identified 450 square metres of 'village shops'. As this is not a land use definition under the Standard Instrument LEP, the retail cap proposed by Uniting is to relate to *retail premises*.

The intent of any retail premises is to meet the immediate, day-to-day needs of future residents and visitors. The proposed retail cap will ensure they remain subservient to the primary allied health care uses for the site and don't challenge the existing retail hierarchy..

Conclusion

This response has undertaken a detailed review of all matters raised by Council in a meeting held on 14 February 2018 for the active Planning Proposal for the War Memorial Hospital at 125 Birrell Street, Waverley.

It demonstrates a significant level of further detailed analysis undertaken by Uniting and their project team to address the comments raised and reiterate their commitment in working with Council to ensure an appropriate outcome for the site is achieved.

Importantly, detailed reporting and analysis demonstrates a built form outcome which better responds to the existing heritage significance of the site and the vicinity, as well as residential amenity in respect of visual and acoustic privacy. The Planning Proposal continues to seek an appropriate degree of flexibility in the development standards to enable Uniting to achieve the high-quality design with functional requirements needed to provide the level of service and development proposed.

As such, we believe the amendments made and added justification provided to Council will enable the completion of the assessment, allowing the Planning Proposal to proceed to the Gateway. Should you have any queries about this matter, please do not hesitate to contact me on 9956 6962 or by email at AAntoniazzi@ethosurban.com.

Yours sincerely,

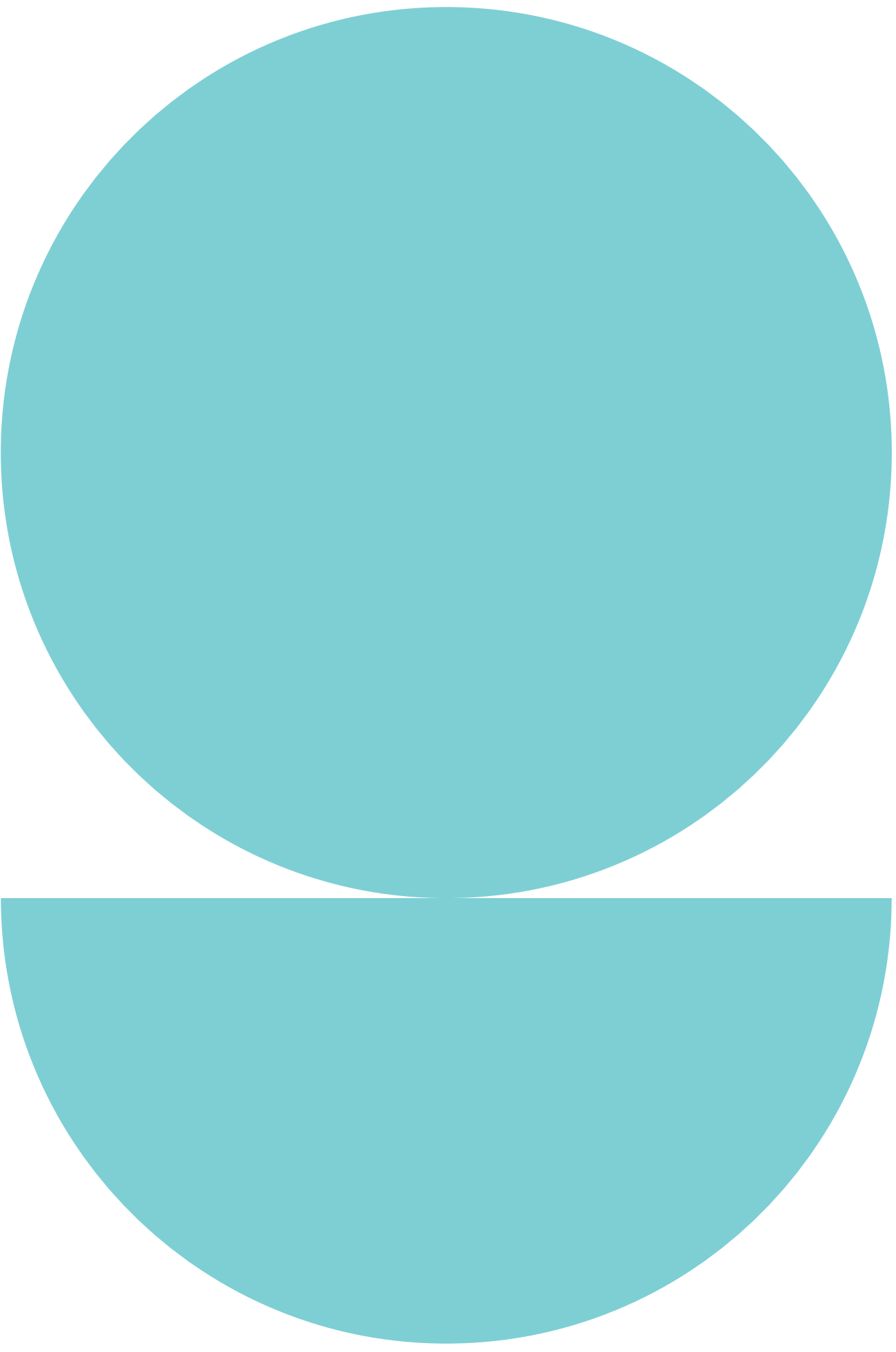


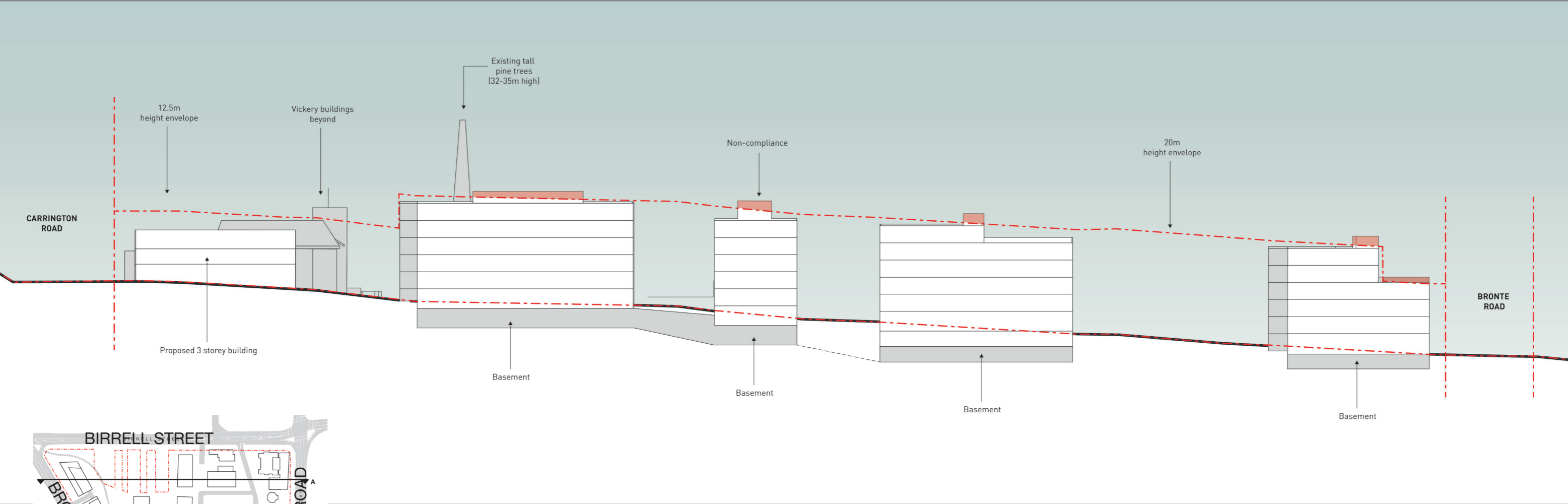
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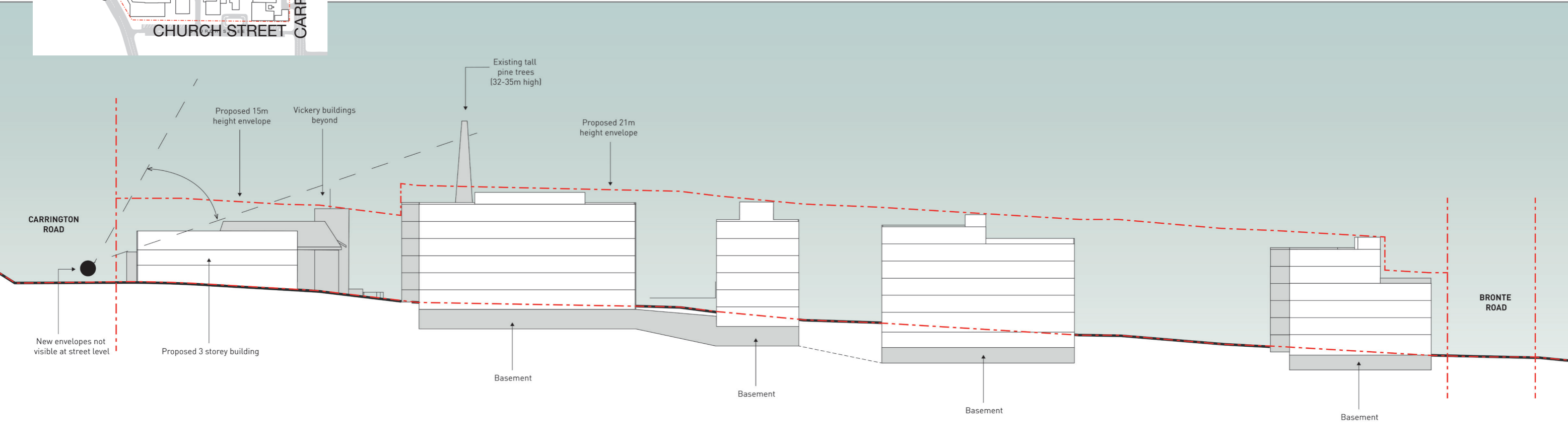
James Harrison
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ATTACHMENT A

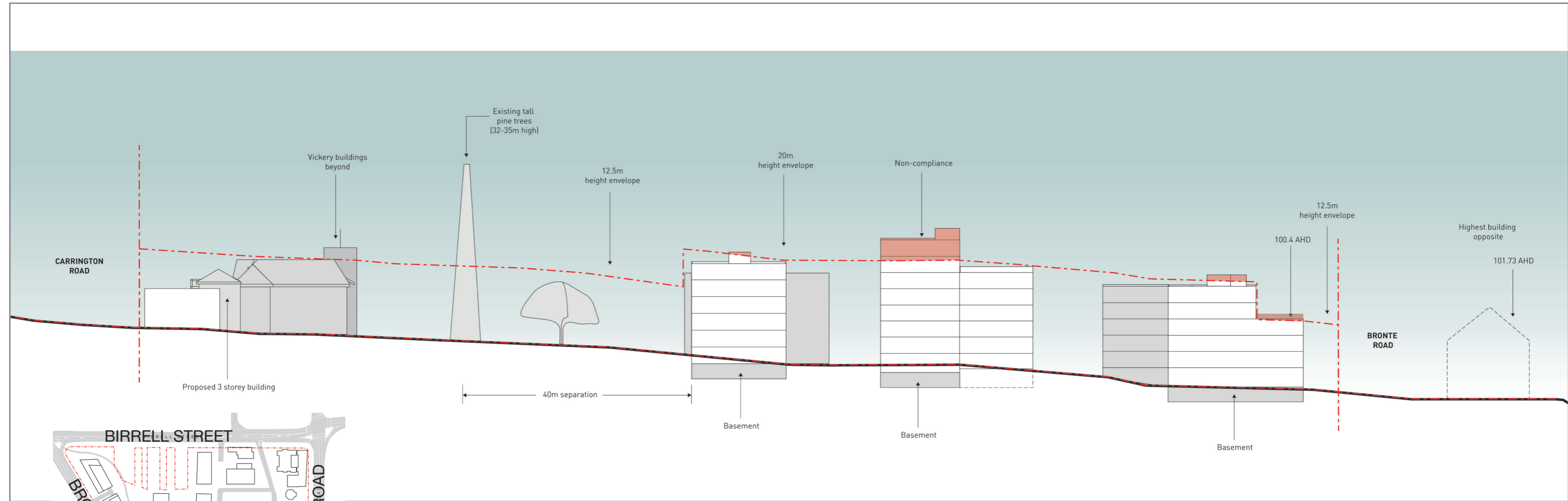




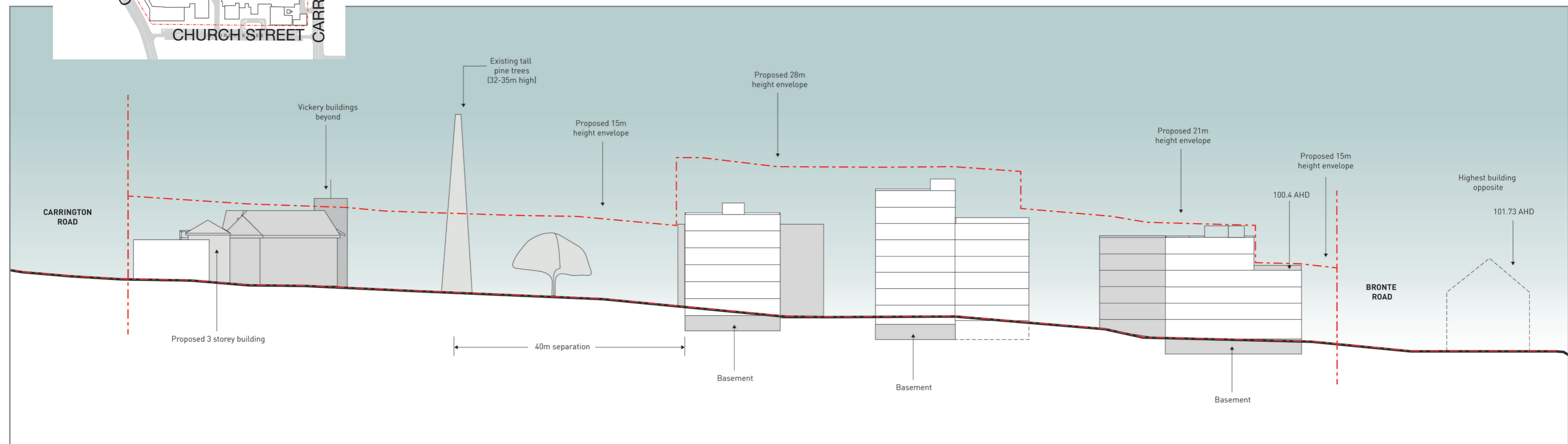
SECTION A - COUNCIL SUGGESTED HEIGHTS WITH DEPARTURES IDENTIFIED (LOOKING SOUTH)



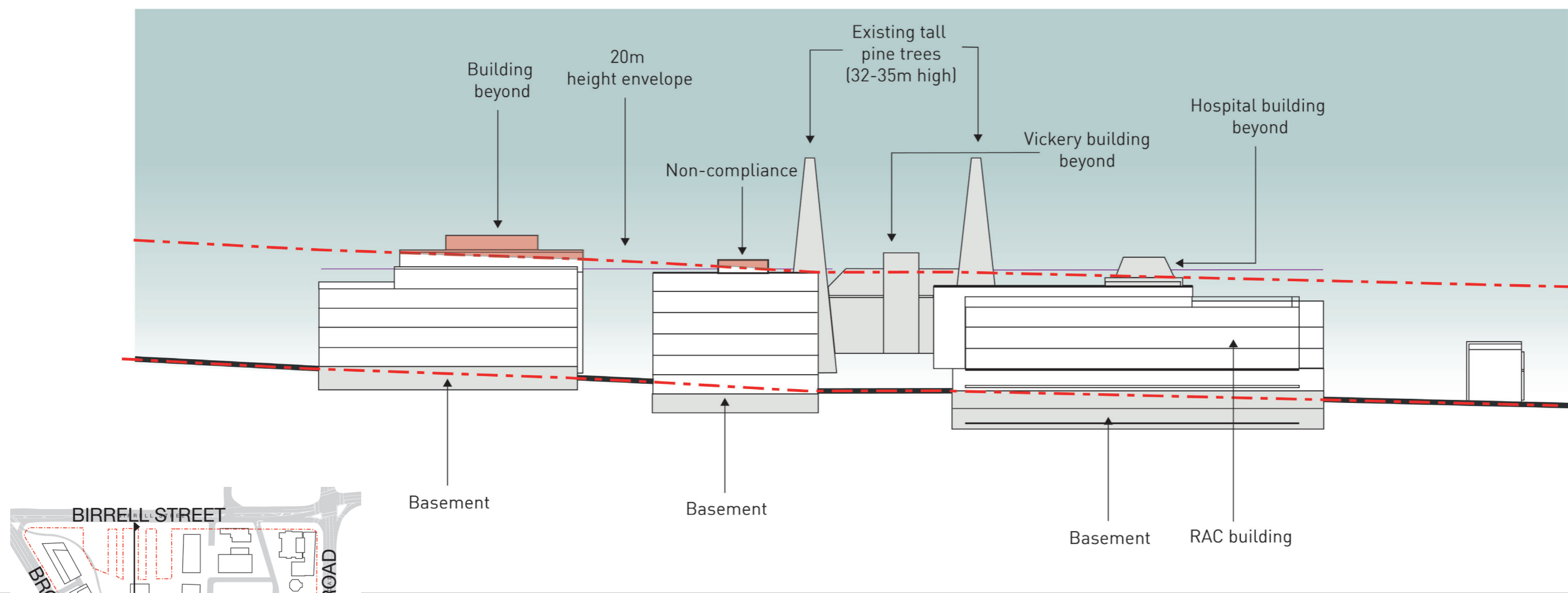
SECTION A - PROPOSED ENVELOPE WITH REVISED HEIGHTS (LOOKING SOUTH)



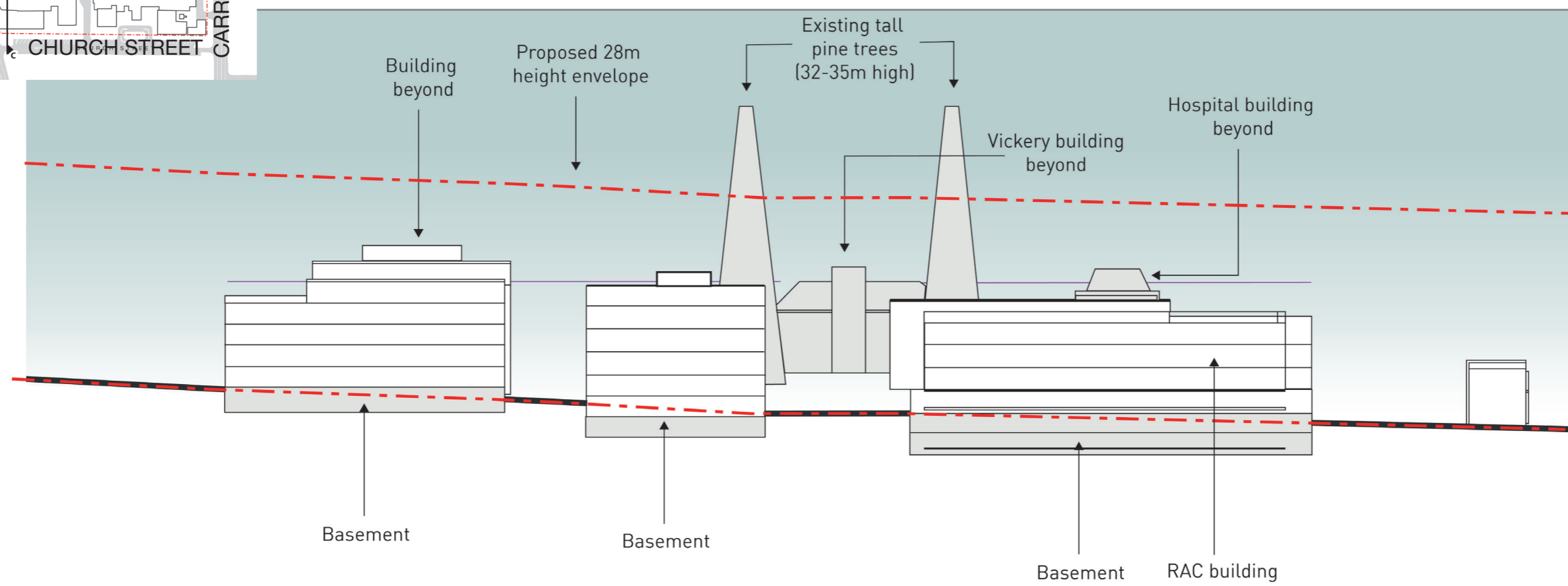
SECTION B - COUNCIL SUGGESTED HEIGHTS WITH DEPARTURES IDENTIFIED (LOOKING SOUTH)



SECTION B - PROPOSED ENVELOPE WITH REVISED HEIGHTS (LOOKING SOUTH)

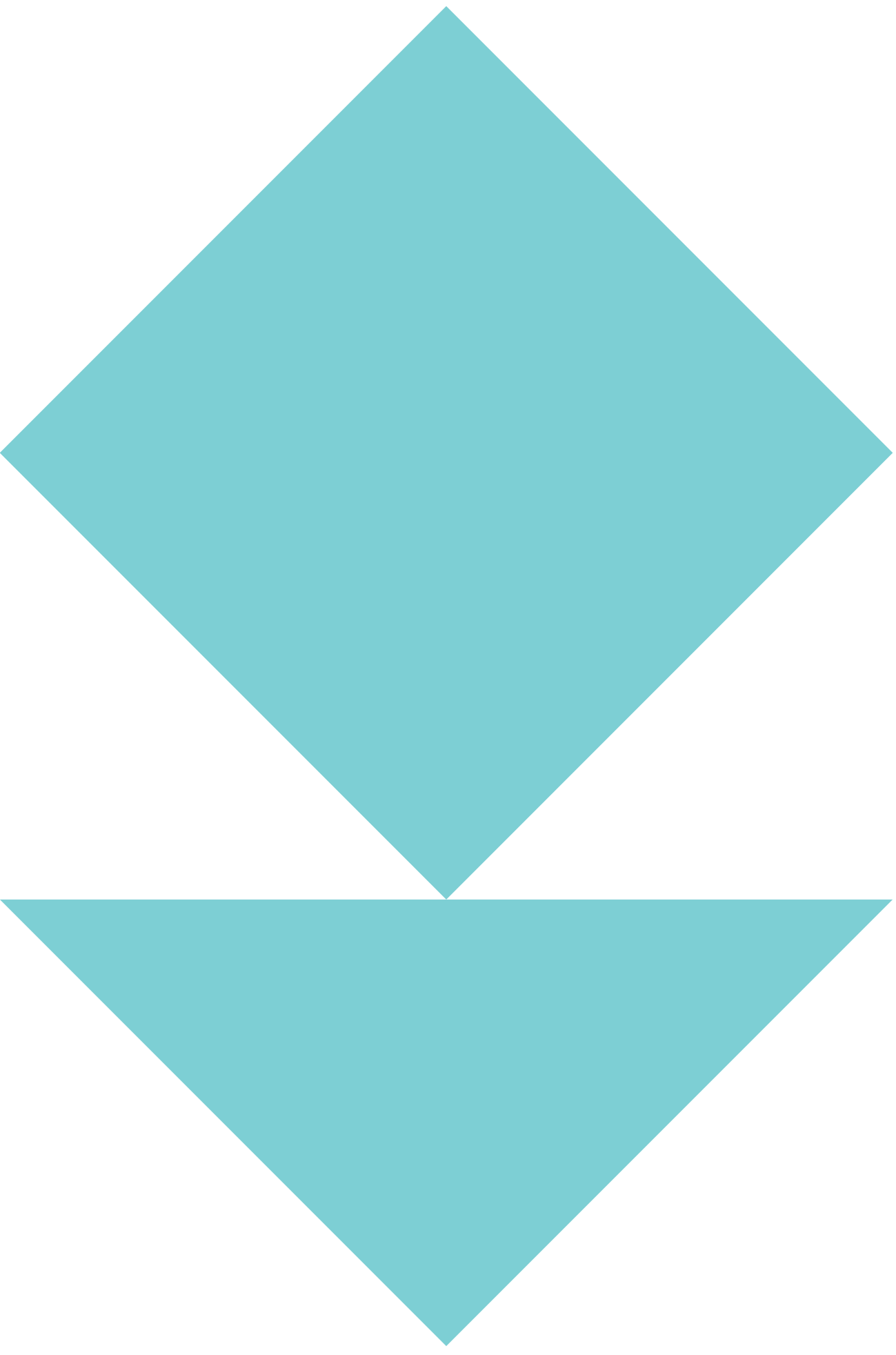


SECTION C - COUNCIL SUGGESTED HEIGHTS WITH DEPARTURES IDENTIFIED (LOOKING EAST)



SECTION C - PROPOSED ENVELOPE WITH REVISED HEIGHTS (LOOKING EAST)

ATTACHMENT B



17th May 2018

Cox Architecture
Sydney
Attention: Mr Michael Grave
Email: Michael.Grave@cox.com.au

Dear Sirs

Re: Uniting (NSW) Waverley War Memorial Hospital Site

We write to offer our response to the comments about heritage that have been received from Waverley Council in connection with the above.

Our advice is based on the attitude to the site as analysed and discussed in our Conservation Management Plan. We suggest that further discussion with council might do well to focus on the principles that are put forward in the policies in the CMP.

At the heart of that attitude are the conservation principles of understanding the estate as a whole grand estate, of achieving a viable single health use, and preserving the spatial order of the garden in relation to Vickery.

Comments about heritage from Council	Response from Hector Abrahams Architects
<i>Carrington Road is a significant heritage streetscape, therefore any future buildings in the streetscape should relate to the scale of the heritage buildings on the site</i>	The built form strategy of the masterplan (page 44) indicated two buildings of two storeys next to the tall rear of Vickery, which is a tall two storey, and one three storeys building in place of the existing three storey Elizabeth Hunter Lodge. This is consistent with what exists on the site. Opposite on Carrington Road is a row of single storey cottages. This is not a relevant benchmark in our view.
<i>Church Street: Built form must respond to the existing heritage items in the streetscape including those at St Claire's College. New buildings on this street should be considered secondary and enhance the heritage items rather than dominating the streetscape.</i>	We simply don't agree with the benchmarking to the neighbouring buildings because the big historic institution that is the War Memorial site has historically always had bigger buildings than its neighbours. (CMP policy 11) The issue is whether the amount of difference is <i>overwhelming</i> to the smaller surrounds. The three-storey envelope to the south of the Morgan Building will be lower

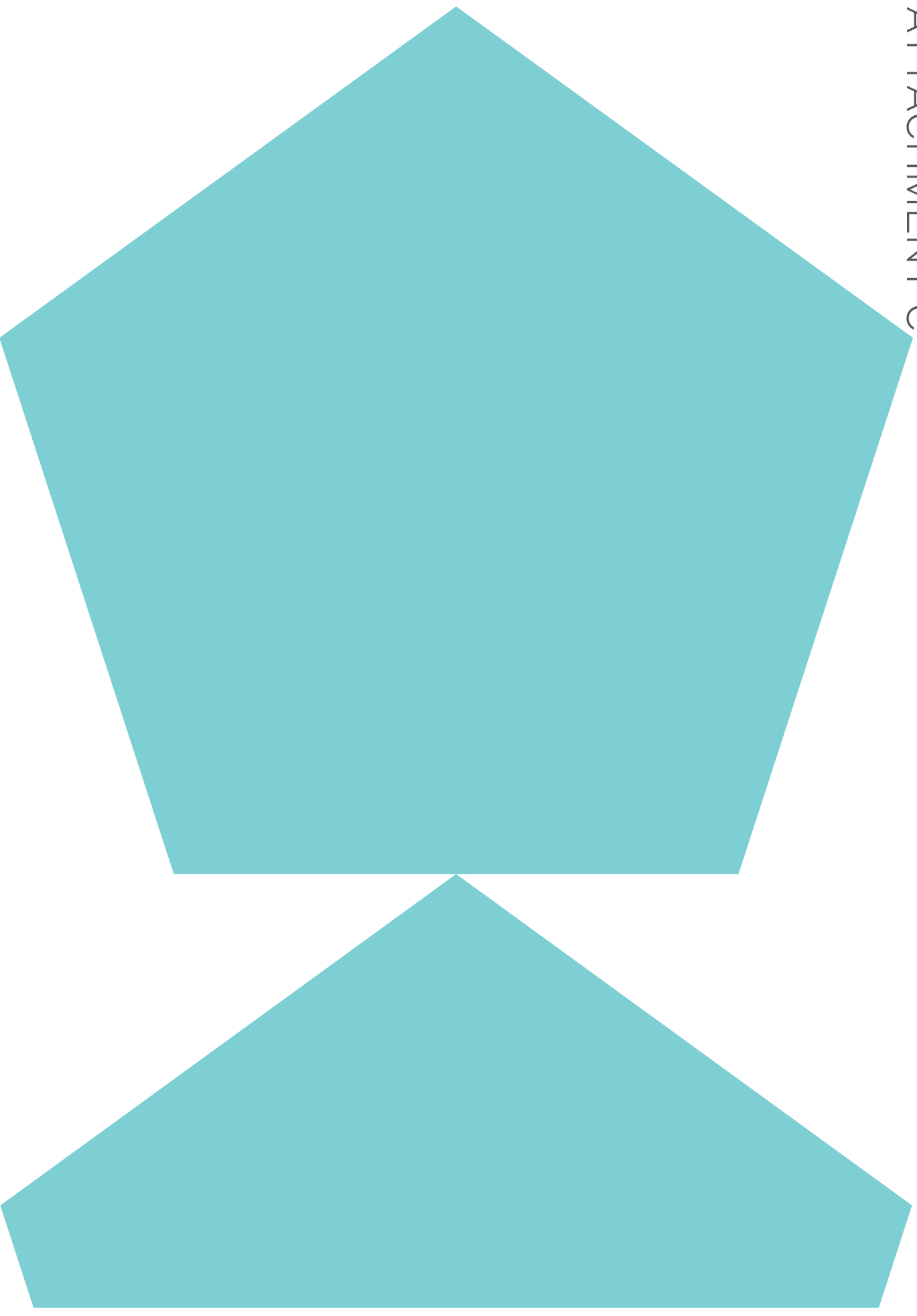
	<p>than the Morgan, which is three tall storeys. A drawing showing this would be helpful. The five-storey building envelope proposed for the RAC is a somewhat overwhelming, but this is a compromise to enable the key operational facility to be placed deeper into the site.</p>
<p><i>Birrell Street: Due to the large number of heritage terraces, single dwellings and medium density flat buildings in this streetscape, the existing 12.5m maximum building height should be retained along this frontage. Any development on this frontage should be no higher than the ridge of the adjacent heritage building (RL 109.17) and anything above the height of the primary eaves should be set back or articulated to respond to the neighbouring heritage item.</i></p>	<p>As a big historic institution, it is not discordant for large buildings to exist on the site, as explained above (CMP policy 11). And since the place is to be opened up for public access, it is not a case where all that matters is what you see on the outside. An agreeable principle is that the new envelope not overwhelm the street scape.</p>
<p><i>All proposed heights – 28m, 21m and 15m challenge and overwhelm the landmark qualities of the Edina (Vickery) tower and Norfolk Island Pines and are not consistent with the scale of the estate</i></p>	<p>The sectional drawings we have seen to date (not in the published masterplan) indicate this is not the case.</p>
<p><i>The fabric, views and spatial relationships ranked Exceptional and High should be conserved.</i></p>	<p>This comment confirms the policy of the CMP</p>
<p><i>External views of the Norfolk Island Pines will still be maintained from Centennial Park and Queens Park. The 28m height plane would stand below the pines as it is on a lower part of the site but would diminish views of the pines.</i></p>	<p>This comment seems to be a confirmation of CMP policy 3</p>
<p><i>The views of the houses along Birrell Street (Banksia and Wychazel, Ellerslie) could be diminished with the proposed 15m and 21m height plane surrounding these dwellings.</i></p>	<p>Views of Banksia, Wych Hazel and Ellerslie may be reduced in the proposed masterplan, but it is not established either way in the current material. Drawings should be done to establish the fact</p>
<p><i>The scale of new buildings should be of a scale consistent with the estate. This allows for large buildings; however, new buildings should not challenge the landmark qualities of the Edina tower or the Norfolk Island pines.</i></p>	<p>This is a confirmation of CMP policy 11.</p>
<p><i>o All proposed heights – 28m, 21m and 15m challenge and overwhelm the landmark qualities of the Edina (Vickery) tower and Norfolk Island Pines and are not consistent with the scale of the estate.</i></p>	<p>This is a repeat of the comment in the box above</p>

We trust these comments are of use to your further discussions with Waverley Council

Regards



Hector Abrahams





Reference: 15.304r02v3

19 April 2018

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Attention: Michael Grave, Associate

**Re: UC Ageing Waverley Campus
Response to Request for Additional Information – Traffic Matters**

Dear Michael,

We refer to your correspondence dated 1st March 2018 concerning the request for additional information from Council regarding the subject development. In particular Council have requested additional information regarding the access arrangements proposed for the subject site, and their relationship to Council's People, Movement and Places strategy for the area.

It is noted the traffic assessment of the subject site dealt with the proposal in terms of a planning proposal masterplan. Access arrangements are subject to change at a later Development Application (DA) stage.

In this regard the modelling assessment that underpinned the masterplan assumed all future Independent Living Unit (ILU) traffic for the proposal made use of the proposed access on Church Road, thereby assessing a 'worst case' scenario. However, it is expected under the master plan that traffic from two ILU buildings shall be accommodated on an existing access on Bronte Road, thereby spreading this load.

Discussions on the potential future access arrangements and their impact on Council's strategy are discussed below.

Bronte Road

It is noted the current site has an access on Bronte Road, serving the existing ILUs in the site. The masterplan proposes to maintain this access for the future use. Under the masterplan proposal the traffic generation for this access relates solely to traffic produced by aged citizens living in ILUs and as such shall generate very low volumes. In addition, this traffic is predominantly generated outside of network and school peak hours. Hence it shall continue to operate in much the same way as currently with a negligible impact on the network.

Maintaining the existing access in this location shall reduce a portion of the traffic on Church Street included under the Masterplan assessment. Thus assisting the implementation of Council's pick up and drop off strategy for Church Street detailed in the People, Movement and Places strategy.



Furthermore, maintaining a site access to service units in the north western corner of the site allows a far superior urban design and staging plan for the heart of the site. By removing the requirement for vehicles to traverse the site, from Church Street in the south to units in the northwest, the landscape plan is able to provide pedestrian boulevards and through site links free from conflicting vehicle movements or basement connection tunnels, in addition it provides redundancy and improved access for emergency vehicles.

As such, maintaining the access for Bronte Road remains supportable at master planning stage and shall provide a superior design outcome, noting that the detailed design of this access, including the quantum of parking it services, shall be set out in any future Development Application for the site.

Church Street

Church Street contains the lowest volume of though traffic and currently provides the primary access for the subject site. As such this road has been identified as the preferred road for the primary access to the proposal.

The access arrangements are subject to detailed assessment at any future DA stage. The DA shall investigate the preferred access concept design for Church Street, including the potential for loading and site access to be integrated reducing the number of driveway crossovers required, or separated, removing conflict between loading vehicles and cars.

In addition, the masterplan proposal outlined a porte-cochere style access to the Residential Aged Care (RAC) and Hospital Buildings. This shall enable pick up and drop off for the RAC / Hospital building to be undertaken on site rather than on Church Street.

The masterplan proposes a primary access for basement parking and servicing to be in a similar location to the existing Church Street access.

It is noted in Council's People, Movement and Places strategy it is proposed Church Street be further utilised for an expanded and managed kiss and ride facility to service local schools.

It is considered the subject development proposal provides an excellent opportunity for Council to deliver an improved kiss and ride facility for Church Street.

Church Street currently provides a small 'kiss and ride' facility on the southern site for up to four cars, in the vicinity of the access to St Charles Primary School. Furthermore, designated police parking is provided on the southern kerb for five cars. The remainder of Church Street provides predominantly unrestricted parking (with a portion of 2-hour parking at the western end). It is noted the northern side of Church Street is ordered in an angled parking arrangement, a maximising its capacity.

The unrestricted parking on Church Street currently serves staff and visitors of the subject site, with limited on site parking available (provided at grade in the centre of the site). The masterplan proposal presents an opportunity to provide basement parking for the site, with a quantum in compliance with the DCP, allowing all staff and visitor parking demands to be accommodated on site.

This shall free up parking on Church Street to allow for additional site accesses on the northern kerb side and an expanded Kiss and Ride facility on the southern side in accordance with Council's strategy.



It is recommended Kiss and Ride be provided on the southern kerb only, preventing a need for children to cross Church Street, and allowing the angled parking on the northern side to be retained for residents.

The relocation of the police parking to the angled parking on the northern side shall allow the full length of Church Street to be utilised, increasing the provision of 'Kiss and Ride' parking from four spaces to twenty, providing a significant community benefit to the neighbouring schools, in accordance with Council's strategy.

With regards to traffic generation of the subject site within Church Street, the proposal for independent living units for aged residents has an excellent synergy with the surrounding school uses. It is noted the residents of the proposed ILUs are typically retirees and are not required to drive to and from the site during the network or school peak periods. In addition, the nursing staff of the aged care facility operate on shifts, outside of the traditional 9-5 working hours.

Hence there is no 'tidal flow' of traffic using the site access and potentially conflicting with the school peak as would be expected should traditional residential flat buildings or commercial space be provided on the site.

In this regard, the proposal represents the optimal land use for the site, providing an opportunity to reduce parking pressure in the vicinity, whilst creating minimal traffic impacts during the key peak periods, as demonstrated in the analysis presented in the traffic impact assessment.

Birrell Street

As noted in the Traffic Impact Assessment a site access is to be maintained on Birrell Street, however it has been proposed this access be restricted to left turn into site only, thus preventing vehicles waiting to turn right into the site from blocking through traffic travelling eastbound on Birrell Street, as currently occurs. This revised access arrangement shall provide a benefit to the operation of Birrell Street over the existing operating conditions.

Carrington Road

Carrington Road is an RMS main road carrying through traffic to Bondi Junction. As such the access strategy does not propose any additional vehicle traffic on Carrington Road. It is noted two historic access driveways remain on Carrington Road providing 'back of house' access to the War Memorial Hospital for service vehicles. This operation is proposed to remain unchanged under the subject proposal.

Summary

Significant consideration has been given to the optimal use for the site and the proposed strategy for access, culminating in the submitted masterplan planning proposal.

It is considered that the proposal provides an excellent opportunity for Council to implement an improved strategy for Church Street whilst providing a wider community benefit with regards to reduced parking pressure in the vicinity and the provision of pedestrian through site links, free of vehicle traffic.

Hence the proposed access arrangements are considered supportable, noting the detailed design shall be subject to further assessment at DA stage. For further information please contact the undersigned.

Yours faithfully,



traffic

Geoff Higgins
Technical Director

Email: geoff.higgins@traffic.com.au

