

28 May 2019

15623

Amanda Harvey  
Director (Sydney Region East)  
Department of Planning and Environment  
320 Pitt Street  
Sydney NSW 2000

Attention: Joel Herbert (Planning Officer, Sydney Region East)

Dear Amanda,

**RE: SUMMARY OF STRATEGIC AND SITE-SPECIFIC MERIT  
PRE-GATEWAY REZONING REVIEW: THE WAR MEMORIAL HOSPITAL - 125 BIRRELL STREET, WAVERLEY**

This letter provides a summary of the strategic and site-specific merit to support the Pre-Gateway Rezoning Review for the amended planning proposal for the War Memorial Hospital at 125 Birrell Street, Waverley (the site). It has been prepared in accordance with Section 6.2 of *A guide to preparing local environmental plans* and consideration of the Planning Circular (PS 18-012) 'Independent reviews of plan making decisions'.

This letter should be read in conjunction with:

- The Amended Planning Proposal prepared by Ethos Urban dated 6 May 2019; and
- Background and Request for Pre-Gateway Review Report prepared by Ethos Urban dated 6 May 2019.

The Waverley LEP was gazetted at the end of 2012. Therefore, the amended planning proposal does not seek to amend LEP controls that are less than 5 years old.

## 1.0 Strategic Merit

### 1.1 Does the proposal give effect to the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, or corridor/precinct plans applying to the site, including any draft regional, district or corridor/precinct plans released for public comment?

#### Greater Sydney Region Plan

The Greater Sydney Region Plan (the Plan) provides a long-term vision for planning and development for Greater Sydney. The Plan is underpinned by the vision for Sydney as a metropolis of three cities (Western Parkland City, Central River City and the Eastern Harbour City).

This vision is supported by a number of directions and objectives that seek to promote the productivity and liveability of Sydney. Under the Plan, the Waverley LGA, where the site is located, forms part of the Eastern Harbour City.

The amended planning proposal will provide infrastructure in line with the forecast growth and demand for seniors housing and health services through the provision of a holistic hub where people can access a range of contemporary housing, accommodation and support services across a spectrum of seniors housing and contemporary healthcare. This will support job growth and contribute to greater housing supply for the over 65 population (projected to increase from 13% to 18% by 2036).

The amended planning proposal also provides a suite of additional land uses to support the ancillary needs of the site, and local community. This will contribute to a diversity of job growth. Heritage across the site is identified and protected, and the amended planning proposal aims to facilitate the retention of open space across the site, and integrate this space with the existing open space network in the vicinity of the site.

For these reasons, the amended planning proposal is considered to be consistent with the following directions and objectives of the Plan:

- Direction 1 - Infrastructure supporting new developments.
  - *Objective 2 – Infrastructure aligns with forecast growth – growth infrastructure compact; and*
  - *Objective 4 – Infrastructure use is optimised*
- Direction 3 – Celebrating diversity and putting people at the heart of planning.
  - *Objective 6 – Services and infrastructure meet communities' changing needs; and*
  - *Objective 7 – Communities are healthy, resilient and socially connected.*
- Direction 4 – Giving people housing choices.
  - *Objective 10 – Greater housing supply; and*
  - *Objective 11 – Housing is more diverse and affordable.*
- Direction 5 – Designing places for people.
  - *Objective 12 – Great places that bring people together.*
  - *Objective 13 – Environmental heritage is identified, conserved and enhanced.*
- Direction 7 – Creating the conditions for a stronger economy.
  - *Objective 22 – Investment and business activity in centres.*
- Direction 8 – Valuing green spaces and landscape.
  - *Objective 28 – Scenic and cultural landscapes are protected.*
  - *Objective 30 – Urban tree canopy cover is increased.*
  - *Objective 31 – Public open space is accessible, protected and enhanced.*

### **Eastern City District Plan**

The site is located in the Waverley LGA, within the Eastern Harbour City. The District Plan establishes a number of planning priorities and actions to manage growth to support the vision for Greater Sydney.

In particular, the District Plan aims to improve both productivity and liveability, supporting the development of well-designed housing that meets the needs of the community, the creation of vibrant public places, and increasing the supply of recreational and open space areas.



The amended planning proposal for the site will give effect to the vision of the District Plan, enabling the staged redevelopment of the site to expand the health and aged care services provided, and to realise the community orientated vision of opening up the site to the local community.

The consistency of the amended planning proposal with the individual priorities of the District Plan are detailed in **Table 1**.

Table 1 - Consistency of the amended planning proposal with the priorities of the Eastern City District Plan

Priority	Comment
<b>Priority E1 - Planning for a city supported by infrastructure</b>	
Objective 2 – Infrastructure aligns with forecast growth – growth infrastructure compact.	The amended planning proposal has assessed services and infrastructure required to meet the demand arising from the planning proposal and Uniting have stated they would be open to a Voluntary Planning Agreement to help provide the infrastructure required to meet the demand associated with the proposal. The amended planning proposal will also support the provision of additional health and community infrastructure.
Objective 4 – Infrastructure use is optimised	The site is already well serviced by existing civil and transport infrastructure.
<b>Priority E3 - Providing services and social infrastructure to meet people's changing needs</b>	
Objective 6 – Services and infrastructure meet communities' changing needs.	The District Plan notes that it is expected that there will be a 102% increase in people aged 85 and over and a 64% increase in the amount of people aged between 65-84 by 2036. The District Plan notes the need for additional health, social and aged care services to meet the expected increase in demand for aged care facilities. The amended planning proposal is consistent with this planning priority and will support the expansion of the existing aged care services on the site, providing much-needed health and community infrastructure.
<b>Priority E4 - Fostering healthy, creative, culturally rich and socially connected communities</b>	
Objective 7 – Communities are healthy, resilient and socially connected.	<p>Planning Priority E4 discusses the provision of healthy, safe and inclusive places for people of all ages and abilities. This amended planning proposal seeks to support a significant expansion of the public domain and pedestrian offering of the site. Specifically, this amended planning proposal will enable the following:</p> <ul style="list-style-type: none"> <li>improving pedestrian accessibility and connections to and through the site by providing a network of landscaped, walkable connections; and</li> <li>providing a central open space at the heart of the site, providing a place where members of the community can connect.</li> </ul> <p>These new spaces will drastically increase the permeability and walkability of the site, providing connections between the site and the surrounding area, and integrating residents on the site into the surrounding community.</p>
<b>Priority E5 - Providing housing supply, choice and affordability, with access to jobs, services and public transport</b>	
Objective 10 – Greater housing supply.	The amended planning proposal will increase the quantum and diversity of housing in the Waverley LGA. Importantly, it will increase the supply of housing that meets the needs of the ageing population in Waverley by providing housing in the form of residential aged care accommodation, independent living units, and seniors and affordable housing. In turn this will relieve demand and pressure on aged care services and provide opportunities for 'ageing in place', with the ancillary uses (including health related services such as medical consulting rooms and pharmacies) enabling residents to access services close to home, without the need to travel off site.
Objective 11 – Housing is more diverse and affordable.	
<b>Priority E6 - Creating and renewing great places and local centres, and respecting the District's heritage</b>	
Objective 12 – Great places that bring people together.	<p>The amended planning proposal and illustrative masterplan will enable substantial public domain and open space improvements which will bring people together. This includes:</p> <ul style="list-style-type: none"> <li>improving pedestrian connections through the site by providing a network of landscaped, walkable connections, thereby improving linkages to the surrounding area;</li> <li>providing a central open space at the heart of the site, providing amenity for both future residents and the surrounding community;</li> <li>enhancing the appreciation of significant heritage features, including the Waverley War Memorial Hospital and Vickery Building and the landscaped gardens, by opening up the site to the community and providing building envelopes separated by landscaped areas that improve viewing opportunities;</li> <li>sensitively integrating land uses that will support the activation of the public domain and enable residents to access services and amenities close to home, without the need to travel off site; and</li> <li>greater integration of the community on the site with the surrounding community.</li> </ul> <p>Together, these improvements will contribute to creation of an attractive and vibrant space for the community. The amended planning proposal will also ensure that the environmental heritage of the site, namely the existing heritage buildings and landscape, are conserved and enhanced.</p>
<b>Priority E11 - Growing investment, business opportunities and jobs in strategic centres</b>	
Objective 22 – Investment and business activity in centres	The site is not located within a strategic centre. It is however in immediate proximity to Bondi Junction which is classified as a 'Strategic Centre' under the Eastern City District Plan.

Priority	Comment
	<p>Bondi Junction provides a high concentration of retail, transport and health services adjacent to employment lands and is expected to increase its role as a key employment destination with an additional 3,200-6,700 workers on the next 20 years. The Plan specifies the following key actions for Bondi Junction:</p> <ul style="list-style-type: none"> <li>• protect capacity for job targets and a diverse mix of uses to strengthen and reinforce the economic role of the centre.</li> <li>• consider potential options for future public transport connections to the south east of the District to accommodate forecast population and employment growth, and better connect the District.</li> <li>• expand the centre's function and type of land uses, and knowledge-intensive jobs.</li> <li>• improve access from the centre of Bondi Junction to nearby open space and recreation facilities such as Queens Park, Centennial Park, Moore Park and Bondi Beach.</li> <li>• recognise the centre's health attributes to support the Randwick health and education precinct and mechanisms for increasing floor space for health uses, including a health-focused business incubator.</li> <li>• investigate opportunities to improve and diversify night-time economy offerings.</li> <li>• promote place making initiatives to improve the quality of public spaces.</li> </ul> <p>The amended planning proposal supports the strategic outcomes associated with Bondi Junction by contributing to the connection of health services to the District Centre. It will contribute to the use of primary medical uses and complementary health uses, aged care, and residential accommodation in direct proximity to a strategic centre. The range of uses proposed under the amended planning proposal provides a supportive health centre which complements the existing health precincts of the Sydney and South Eastern Health Districts, therefore achieving one of the plans liveability priorities.</p>
<b>Priority E16 - Protecting and enhancing scenic and cultural landscapes</b>	
Objective 28 – Scenic and cultural landscapes are protected.	<p>The amended planning proposal respects the heritage significance of existing buildings and landscaping and does not present significant heritage impacts. Aspects of the amended planning proposal that enhance the cultural heritage significance of the site include:</p> <ul style="list-style-type: none"> <li>• Retention and restoration of all fabric, spaces and uses ranked Exceptional and High in the Conservation Management Plan (CMP);</li> <li>• The new Bronte Road entry, axial path landscaping, framing of the original courtyard of the estate, and its focus on the Vickery Building; and</li> <li>• Construction of landscaped trees, path system.</li> </ul> <p>Further, by opening up the site to the public, the amended planning proposal will improve access to cultural heritage landscapes for the benefit of the community.</p>
<b>Priority E17 - Increasing urban tree canopy cover and delivering Green Grid connections</b>	
Objective 30 – Urban tree canopy cover is increased.	<p>The amended planning proposal has prioritised the retention of three significant trees and the existing heritage gardens of the site. The trees proposed for removal are consistent with the Arborist Assessment Report prepared by Taylor Brammer Landscape Architects submitted with the amended planning proposal. The Arborist Assessment found that the trees proposed to be removed are in a state of decline. The Landscape scheme proposed for the site will enable further planting and tree coverage to ensure the site is provided with natural shade, helping to reduce the heat island affect.</p>
Objective 32 – The Green Grid links parks, open spaces, bushland and walking and cycling paths.	<p>The amended planning proposal will retain and enhance existing green links within the Waverley LGA (refer to <b>Figure 1</b>).</p>

Priority	Comment
	 <p data-bbox="416 853 1034 875"><b>Figure 1 - Green Links in the Waverley LGA in relation to the site</b></p> <p data-bbox="416 887 528 909">Source: Cox</p>
<b>Priority E18 - Delivering high quality open space</b>	
<p data-bbox="145 969 408 1048">Objective 31 – Public open space is accessible, protected and enhanced.</p>	<p data-bbox="416 969 1422 1048">The amended planning proposal recognises the need for significant open space and public domain areas, and uses which encourage community engagement that contribute to a more healthy, resilient and more socially connected Eastern City.</p> <p data-bbox="416 1077 1422 1182">The amended planning proposal increases the amount of high-quality open space available with the Waverley LGA through the creation of a substantial area of public domain at the centre of the site. The illustrative masterplan provides an appropriate interface with this public domain, providing an opportunity for human-scale spaces with opportunities for sensitively integrated activating land uses.</p> <p data-bbox="416 1211 1422 1317">This area of publicly accessible open space within the illustrative masterplan will be supported by a network of green linkages, which will improve permeability within the site and connect the site to the surrounding area. It will facilitate broader community engagement with, and enjoyment of the open space on the site and its unique heritage setting.</p>  <p data-bbox="416 1865 1015 1888"><b>Figure 2 - Indicative location of green spaces and connections</b></p> <p data-bbox="416 1899 528 1921">Source: Cox</p>

## A Plan for Growing Sydney

Released in 2014, A Plan for Growing Sydney was the metropolitan strategic plan that applied to the planning proposal at the time of lodgement on 4 July 2017.

A Plan for Growing Sydney placed a strong emphasis on fostering a competitive economy, accelerating housing supply and achieving efficient use of existing urban areas that are located close to infrastructure and services, as well as fostering healthy built environments and a sustainable and resilient natural environment.

The amended planning proposal is consistent with all goals identified in the metropolitan plan and the way that it contributes to specific directions in the plan (refer to **Table 2**).

**Table 2 - Consistency of the amended planning proposal with directions of A Plan for Growing Sydney**

Direction	Consistency
1.7 Grow strategic centres – providing more jobs closer to home	This direction focuses on the productivity benefits of strategic centres, where businesses and services are clustered together and can provide employment for those who live locally. Bondi Junction is identified as one strategic centre where agglomeration is to be encouraged. The site is located directly adjacent Bondi Junction. It will contribute to the achievement of the direction by providing an agglomeration of health service facilities and commercial uses in direct proximity to the Bondi Junction centre. The provision of increased health services facilities will provide more employment opportunities for allied health workers and contribute to the ongoing viability of Bondi Junction as a Strategic Centre.
1.10 Plan for education and health services to meet Sydney's growing needs	Expanding health services to meet the needs of expected population growth is identified as essential to maintaining Sydney's competitiveness and standard of living into the future. Planning for expansion of health facilities includes both hospitals and community health facilities and is underpinned by an understanding of how lifestyles, the built environment and socio-economic factors will influence future health needs. The amended planning proposal is considered to directly contribute to this direction as it seeks to provide additional health facilities, both in terms of services and accommodation. Further to this, the amended planning proposal deliberately incorporates design principles that seek to influence lifestyles and the built environment to improve health outcomes.
2.3 Improve housing choice to suit different needs and lifestyles	This direction focuses on the need to adapt the city's housing stock as the population changes, with a particular focus on the ageing population. It is noted that people prefer to remain in their communities as they age and that 'universal housing' that allows people to stay in their home as they age is becoming increasingly commonplace. The amended planning proposal is consistent with this direction as it seeks to provide additional residential housing stock designed specifically for the elderly who either seek to remain in their home as they age or require care. The proposal is also capable of increasing affordable housing stock.
3.3 Create healthy built environments	This direction acknowledges the important role that the built environment plays in supporting physical activity, social interaction and equitable access to health food as well facilitating social cohesion and community connectivity. This direction seeks to implement healthy built environment principles to achieve these benefits. The amended planning proposal is underpinned by a commitment to implementing healthy built environment principles to encourage an active lifestyle for residents as well as to foster social connectivity with the wider community.
3.4 Promote Sydney's heritage, arts and culture	This direction identifies the important role that heritage buildings play in community life and providing a connection to the past and sense of identity. The amended planning proposal is consistent with this direction as it seeks to protect the heritage value of the Waverley War Memorial Hospital, Vickery Building and gardens as well as provide enhanced connections to these heritage items for the community. The illustrative masterplan seeks to use deliberate design elements to reinstate the original character of the estate, increasing the site's overall sense of identity and connection to the past.

## 1.2 Is the proposal consistent with a relevant local council strategy that has been endorsed by the Department?

### Waverley Local Strategic Planning Statement

Waverley Council are currently in the process of preparing their Local Strategic Planning Statement (LSPS). The Waverley LSPS will build on the vision established in the Waverley Community Strategic Plan 2018-2029, identifying planning priorities, actions and mechanisms for the delivery of the Waverley LSPS. There has been no endorsement of the LSPS by the Department.

The Waverley LSPS will also address the relevant priorities and actions from the Greater Sydney Region Plan and Eastern City District Plan. The Waverley LSPS has not yet been placed on public exhibition, but it is anticipated that it will be submitted to the Waverley Strategic Planning and Development Committee meeting that is scheduled for June 4, 2019.

### **Waverley Economic Development Strategy**

The Waverley Economic Development Strategy 2015, while not formerly endorsed by the Department, provides strategic direction to guide local economic development and ensure economic priorities throughout the local government area are achieved. The plan details four key priorities with individual initiatives to support long-term economic development and nine methods to achieve these priorities. These priorities include:

- *Renew* – facilitated through destination marketing, place management and destination development;
- *Innovate* – facilitated through improving diversity and competitiveness;
- *Collaborate* – facilitated through government and industry partnerships; and
- *Enable* – facilitated through reducing barriers and improving business support.

The amended planning proposal will establish a planning framework to support the future expansion of the health and aged care services currently provided on the site. It will also assist in realising the vision of opening up the site to the local community, while the variety of ancillary commercial and community land uses proposed will further support the renewal of the site as a more active and social destination.

The amended planning proposal will also support innovative growth through the increase of local jobs within Waverley and the improvement of co-working opportunities via the clustering of services. The illustrative masterplan provides one potential framework for this growth, ensuring growth continues to adhere to the local and strategic direction of the area.

The site is positioned in close proximity to Bondi Junction in which has been classified by the State Government as a strategic commercial centre linked to 'Sydney's Global Economic Corridor'. This corridor, which consists of service-based jobs operating in health, finance, insurance, tourism and education is expected to promote growth within Bondi Junction in furthering its role as Waverley's strategic centre. The amended planning proposal will support the renewal of:

- Waverley employment – employment is concentrated in three key destination, one of which being Bondi Junction.
- Five industries account for 50% of jobs, one of which being healthcare. Overall, Waverley holds a higher concentration of health care and social assistance jobs than greater Sydney.

The amended planning proposal will provide health and allied services close to Bondi Junction, therefore contributing to serviced based employment growth adjacent a strategic commercial centre identified within 'Sydney's Economic Corridor'.

### **Waverley Community Strategic Plan 2018-2029**

The Waverley Community Strategic Plan 2018-2029, which was adopted in June 2018, details the long-term priorities of Waverley. The vision for Waverley is for "a welcoming and cohesive community that celebrates and enhances our spectacular coastline, vibrant places, and rich cultural heritage".

The amended planning proposal supports this vision for Waverley as it will enhance the appreciation of significant heritage features, including the Waverley War Memorial Hospital and Vickery Building, by opening up the site to the community and providing building envelopes separated by landscaped areas that improve viewing opportunities to these heritage items.

**Table 3 - Consistency of the amended planning proposal with Waverley Council Community Strategic Plan 2018-2029**

Themes	Comments
Arts and Culture	
1.2 Preserve and interpret the unique cultural heritage of Waverley.	The amended planning proposal will retain the existing items of heritage significance. In addition, by opening the site to the public, the planning proposal will promote appreciation for the cultural heritage of Waverley.
Recreation and Open Space	
3.1 Improve health and quality of life through a range of recreational opportunities and quality open spaces.	The amended planning proposal will increase the amount of high-quality open space available with the Waverley LGA through the creation of a substantial area of public domain at the centre of the site. This area of publicly accessible open space within the illustrative masterplan will be supported by a network of green linkages, which will improve permeability within the site and connected the site to the surrounding area.
3.2 Expand the network of parks and open spaces, sporting and recreational facilities.	
Local Economy	
4.2 Ensure Bondi Junction and Waverley's villages continue to have a diverse range of businesses, local jobs and services.	The amended planning proposal is directly adjacent Bondi Junction and supports the strategic outcomes associated with Bondi Junction. It will contribute to the provision of medical uses, ancillary and complementary health uses, and aged care residential accommodation. This will ensure that Bondi Junction continues to have a diverse range of businesses, local jobs and services.
Planning, Development and Heritage	
5.1 Facilitate and deliver well-designed, accessible and sustainable buildings and public places that improve the liveability of existing neighbourhoods	The amended planning proposal will facilitate the future development of additional health services, seniors housing, ancillary services and open space which will better support the liveability of the existing neighbourhood.
5.2 Value and embrace Waverley's heritage items and places.	The amended planning proposal will retain the existing items of heritage significance and by opening up the site to the public and improve the appreciation of the heritage significance of the site.
5.3 Encourage new developments to achieve design excellence.	Future development in accordance with this amended planning proposal will be capable of achieving design excellence.
Transport, Pedestrians and Parking	
6.2 Build and maintain streetscapes that have a welcoming sense of place.	The sensitive arrangement of built form and the retention of existing development along Carrington Road will ensure that the existing streetscape character is maintained.
Sustainable Environment	
8.3 Protect and increase our local bushland, parks, trees and habitat.	As discussed in <b>Section 2.0</b> , the amended planning proposal will not adversely impact on known biodiversity and enhance vegetation and landscaping.

### 1.3 Is the proposal responding to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognised by existing planning controls?

The Waverley LEP, which this amended planning proposal seeks to amend, was formally gazetted at the end of 2012. Since this time, the Greater Sydney Region Plan and Eastern City District Plan have been prepared by the Greater Sydney Commission. The Region Plan (Objective 10) and the District Plan (Priority E3), using information obtained from the 2016 Australian Census, recognises the forecasted increase in the older population.

The District Plan identifies an 102% increase in people aged 85 and over, and a 64% increase in the amount of people aged between 65-84 by 2036. The strong growth in couple-only households (increasing by 31,750 households by 2036) will also require homes and aged care facilities. Waverley Council have found that the population of Waverley aged over 65 is expected to increase 38% by 2036, to a total of 8,800 residents.

The expected increase in the aged population will result in increased demand for health, social and aged care services within the Waverley LGA. The amended planning proposal has responded to the demographic trend driving the increased demand for aged care services, and will enable the expansion of the existing aged care services on the site. It will support the creation of a holistic community hub where seniors can access a range of aged care and support services across a spectrum ranging from seniors housing to contemporary healthcare.

However, at this time, the planning controls that apply to the site do not adequately recognise the aforementioned demographic trends. Specifically, the land use zoning, maximum floor space ratio and maximum height of building control that apply to the site under the Waverley LEP 2012 preclude the expansion of the Waverley Memorial Hospital to a point where it can provide additional infrastructure and services to support the forecasted increase in the older population.

## Summary of Strategic Merit

As detailed in the proceeding sections of this letter, the amended planning proposal for the site is considered to demonstrate strategic merit on the basis that it:

- gives effect to the directions and priorities of the Eastern City District Plan;
- is consistent with relevant strategies prepared by Waverley Council, which while not formally endorsed by the Department, provide strategic direction on Council's vision for the LGA; and
- responds to changing circumstances within the Waverley LGA, namely the forecasted increase in the aged population of Waverley and the associated need for additional health, social and aged care services to meet the demand associated with this increase.

## 2.0 Site-Specific Merit

### 2.1 Does the proposal have regard to the natural environment (including known significant environmental values, resources or hazards)

The amended planning proposal has considered the natural environmental, and any significant environmental values, resources and or hazards associated with the site.

Other than the heritage significance of the site, the site does not contain land of environmental significance or land of biodiversity value. The environmental assessment undertaken to inform the amended planning proposal has not identified any environmental resources or hazards which would prevent the redevelopment of the site inline with the amended planning proposal, and its vision of creating a holistic health precinct which unifies the site and reconnects the site with the broader community.

More specifically:

- The site and its surrounds is already urbanised, and does not contain any threatened flora and fauna;
- Following a Phase 1 Environmental Site Assessment undertaken for the planning proposal, it has been determined that the site can be suitable for further development from a contamination perspective;
- There are no trees with heritage value on the site that are proposed to be removed (with the exception of the Cottonwood Tree and Kurrajong Tree which are deemed to be in a state of decline (refer to Arborist Report prepared for the planning proposal));
- The trees removed from the site will have replacement planting that will reinforce and reinstate the original estate planting, which is of significant environmental value to the site. The landscape design approach for the future redevelopment includes the introduction of a further layer of estate planting, as well as improvements to the streetscape. Trees that are required to be removed as part of any future development will be replaced with a combination of evergreen and deciduous trees in line with the original estate character of the site.
- The heritage assessment undertaken for the planning proposal (including a Heritage Impact Statement and Conservation Management Plan) provides a conservation framework which will ensure any future development

on the site will respect its existing heritage, and will not generate significant adverse heritage impacts. The CMP will support the reinvigoration and integration of the existing heritage items on the site, and their integration with the local community;

- The amended planning proposal recognises its natural environment in the form of Waverley Park to the north and Queens and Centennial Park to the south. The integrated open space and landscaping proposed will reconnect the site with these green spaces and support a network of green linkages, which will improve permeability within the site and connect the site to the surrounding natural environment. This will also increase community engagement with the site and its unique heritage setting;
- The existing heritage landscapes and gardens have been considered to ensure the original garden character of the estate is reinstated. Notably, the central garden space will be preserved. Future built form which will be scaled in line with the Vickery Building and historic hospital building, and will frame this central garden in line with its original character. Other significant landscape elements including most significant trees and primary root zones will also be retained;
- Important heritage view lines from each street into the site are retained. These include:
  - The palm-lined driveway between heritage buildings from Birrell Street;
  - Views into the Chapel garden from Carrington Road;
  - The pedestrian walk representing the original carriageway from the Bronte Road gates; and
  - Views into the garden adjacent the Morgan hospital building on Church Street.
- An extensive analysis of views has been undertaken from adjacent streets and more distant vistas. It has considered the built form outcomes under the illustrative masterplan in relation to known environmental elements in and around the site including the taller plantings of the site, vistas from Centennial and Queens Park, heritage spaces and vistas through the site, and surrounding streets. The analysis demonstrates that:
  - The distribution of built form will reinforce the traditional heritage vistas across the site, especially the views to the Vickery Building, Norfolk Pines and historical courtyard from Bronte Road and Birrell Street;
  - The distribution and scale of built form across the site ensures the landmark qualities of the Edina (Vickery) tower and Norfolk Island Pines of the site are not challenged; and
  - That any proposed taller buildings in the centre of the site would not have any significant degree of visibility from the broader open space areas and adjoining street frontages, ensuring the existing character of those street frontages and broader area is retained.

## **2.2 Does the proposal have regard to existing uses, approved uses, and likely future uses of land in the vicinity of the proposal**

The site currently provides aged care, health and other key ancillary services which need renewal and in their current state, do not meet universal living standards and the high standard of care Uniting wish to provide.

A specific example is where current aged care residents are mainly living in four-bed rooms with shared bathrooms which are not in line with the contemporary aged care service model Uniting would like to provide.

Other limitations of the existing uses which have informed the amended planning proposal include:

- residential aged care facilities nearing the end of their life;
- limited potential for growth in provision of Independent Living Units and supporting social facilities;
- the need to expand and update the Hospital accommodation and supporting facilities;
- current Independent Living Units are not achieving contemporary standards of accommodation; and
- limited potential for additional and enhancement of other social and health-related services.

The amended planning proposal is intended to facilitate the improvement and enhancement of services and accommodation, and improve the overall level of care Uniting is able to offer the Waverley community.

It will use the size and strategic location of the site to do this in a way which creates a more holistic health precinct, and better integrates the site and its residents with the community. It will reinstate the historic 'grand estate' character of the site, celebrating both the existing buildings and their landscaping, and improve green links to and from the site with improved street edge interfaces and entries which will invite the community in.

The existing zoning surrounding the site is predominately R3, comprising a range of medium density housing, including residential flat buildings, terraces and townhouses. The height of surrounding residential development ranges between one to four storeys.

The amended planning proposal has regard to these residential uses in the vicinity of the site to ensure that future development is compatible with the surrounding built form character and does not result in unreasonable environmental impact.

The proposed heights are strategically positioned across the site. Taller heights are positioned central to the site which utilise its significant size and topography to reduce the perceived scale of development when compared to surrounding development. Heights transition downwards towards adjoining development, providing an appropriate built form interface with the existing scale of development in the site's vicinity.

The amended planning proposal will open the site up to the existing community for their enjoyment, especially for the surrounding residents and students in the vicinity of the site. It will improve their connectivity through the area, improve their access to open space, and increase their enjoyment of the local heritage in their immediate surrounds.

It is noted that stimulation of urban renewal typically requires sufficient amalgamation of land, and permissibility of viable land uses. The delivery of significant and strategic public benefits, such as new areas of public domain, services and infrastructure, can usually only be delivered over the very long term or on large land holdings under single ownership.

The site forms a large and consolidated portion of land under single ownership. It is strategically located directly adjacent to Bondi Junction and its ability to deliver an aged care and health service precinct in the area makes it a rare, and indeed unique opportunity in the context of the strategic need to strengthen and support Bondi Junction, and support aged care and other key services for the Eastern District.

As mentioned above, the site adjoins Bondi Junction, which will continue to increase its role as a strategic centre. Bondi Junction is currently subject to various DA's and planning proposal's which seek to increase uplift inline with this role. The amended planning proposal will capitalise on the opportunity provided by the size and scale of the site and its strategic positioning directly adjacent Bondi Junction, to deliver an integrated aged care and health service precinct that will directly cater to and service the increased commercial and business environment of Bondi Junction.

### **2.3 Does the proposal have regard to the services and infrastructure that are or will be available to meet the demands arising from the proposal and any proposed financial arrangements for infrastructure provision**

The site is well serviced by existing civil and transport infrastructure. Notwithstanding, the amended planning proposal has assessed services and infrastructure required to meet the demand arising from the planning proposal. In particular:

- The Traffic Impact Assessment prepared with the planning proposal confirms that the proposal will have minimal impact on the surrounding road network; and
- The Infrastructure Services Report prepared with the planning proposal confirms that existing civil infrastructure is capable of servicing the future redevelopment of the site, subject to the relevant augmentation of services.

The vision for the site and project overall is of high priority and of organisational significance for Uniting. Uniting is in a fortunate position to be self-funded. It has a sustainable ten-year plan. The future redevelopment of the site is part of this plan and a budget is already in place to ensure the services and infrastructure need to achieve the vision for the site are in place.

Uniting have stated they are willing to enter into a Voluntary Planning Agreement with Council to help provide the services and infrastructure required to meet the demand associated with the amended planning proposal.

Should you have any queries in relation to the above, please do not hesitate to contact the undersigned.



**Arcangelo Antoniazzi**  
*Urban Planner*  
02 9409 4991  
AAntoniuzzi@ethosurban.com



**Gordon Kirkby**  
*Director*  
02 9956 6962  
GKirkby@ethosurban.com