

# SITE COMPATIBILITY REPORT

## 367 Bronte Road - Bronte



April 2013



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## SEPP (HOUSING FOR SENIORS OR PEOPLE WITH A DISABILITY) 2004 DIRECTOR-GENERAL'S SITE COMPATIBILITY CERTIFICATE APPLICATION

Date received: \_\_\_\_/\_\_\_\_/\_\_\_\_

Site compatibility application no. \_\_\_\_\_

### LODGEMENT

#### Instructions to users

This application form is to be completed if you wish to apply to the Director-General of the Department of Planning for a site compatibility certificate under Chapter 3, Part 1A of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (the SEPP).

A site compatibility certificate is required under section 50(2A) of the Environmental Planning and Assessment Regulation 2000 to accompany development applications for certain proposed developments under the SEPP. The types of development applications to which the Regulation applies are listed in clause 24 of the SEPP.

Before lodging this application, it is recommended that you consult with the Department of Planning concerning your development proposal, including whether a site compatibility certificate is required and what application fee will apply.

To ensure that your application is accepted, you must:

- complete **all** parts of this form, **and**
- submit **all** relevant information required by this form, **and**
- provide **3 copies** of this form and attached documentation,
- provide form and documentation in **electronic format** (e.g. CD-ROM).

NB: The Department of Planning may request further information if your application is incomplete or inadequate.

All applications **must be lodged** with the Director-General, by courier or mail. Applications can be lodged with the relevant regional office of the NSW Department of Planning. Please refer to [www.planning.nsw.gov.au](http://www.planning.nsw.gov.au) for contact details.

### PART A — APPLICANT AND SITE DETAILS

#### A1 APPLICANT FOR THE SITE COMPATIBILITY CERTIFICATE

Company/organisation/agency

**Premier Consulting Australia Pty Ltd**

☒ Mr ☐ Ms ☐ Mrs ☐ Dr ☐ Other

First name

**Robert**

Family name

**Goff**

Street address

Unit/street no.

**L5 No. 1**

Street name

**Alfred Street**

Suburb or town

**Sydney**

State

**NSW**

Postcode

**2000**

Postal address  
(or mark 'as above')

PO Box or Bag

Suburb or town

**As above**

State

Postcode

Daytime telephone

**02 8071 4250**

Fax

**-**

Email

**rgoff@premierconsulting.com.au**

Mobile

**0412 036 300**

#### A2 SITE AND PROPOSED DEVELOPMENT DETAILS

Identify the land you propose to develop and for which you seek the Director-General's site compatibility certificate.

NAME OF PROPOSAL

**Loreto Residential Aged care Facility**

STREET ADDRESS

Unit/street no.

**367**

Street or property name

**Bronte Road**

Suburb, town or locality

**Bronte**

Postcode

**2024**

Local government area

**Waverley**

NAME OF PROPERTY

**Loreto**

REAL PROPERTY DESCRIPTION

**A/DP79074, B/DP79074, 1/DP15249, 2/DP15249, 3/DP15249****Attach**—map and detailed description of land.

Note: The real property description is found on a map of the land or on the title documents for the land. If you are unsure of the real property description, you should contact the Department of Lands. Please ensure that you place a slash (/) to distinguish between the lot, section, DP and strata numbers. If the proposal applies to more than one piece of land, please use a comma to distinguish between each real property description.

DESCRIPTION OF PROPOSED DEVELOPMENT (as it is to appear on the Director-General's certificate) Refer to the proposed site layout by title or drawing number to enable reference in the certificate.

**98 bed Residential Aged Care Facility as shown in proposed site layout in Appendix B**

**Attach**—copy of proposed site layout.

## PART B — PROPOSAL'S CONSISTENCY WITH THE SEPP

### B1 THE PROPOSED SITE

Answer the following questions to identify whether the SEPP applies to the land you propose to develop.

1.1. Is the subject site land zoned primarily for urban purposes?

☒ Yes ☐ No

**OR**

1.2. Is the subject site land adjoining land zoned primarily for urban purposes?

☐ Yes ☐ No

**Attach**—copy of zoning extract or other evidence of zoning.

If you have answered **no** to **both** questions 1.1 and 1.2, then the SEPP does not apply to the land and a site compatibility certificate will not be issued.

1.3. Are dwelling houses, residential flat buildings, hospitals or special uses permitted on the site?

☒ Yes ☐ No

**Attach**—copy of development control table.

**OR**

1.4. Is the land being used for the purposes of an existing registered club?

☐ Yes ☐ No

If you have answered **no** to **both** questions 1.3 and 1.4, then the SEPP does not apply to the land and a site compatibility certificate will not be issued.

1.5. Is the subject site excluded from the application of the SEPP under clause 4(6)—*Land to which Policy does not apply*?

- |   |                              |  |
|---|------------------------------|--|
| ▪ Environmentally sensitive land (Schedule 1).  | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| ▪ Land that is zoned for industrial purposes (except Warringah LGA).                        | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| ▪ Land in Warringah LGA located in localities identified in clause 4(6)(c) of the SEPP.     | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| ▪ Land to which Sydney Regional Environmental Plan No. 17—Kurnell Peninsula (1989) applies. | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

If you have answered **yes** to **any** subsection in question 1.5, then the SEPP does not apply to the land and a site compatibility certificate will not be issued.

### SECTION B1 — SUMMARY CHECK

Continue to fill out this application form **only** if you have answered:

- ☒ Yes to questions 1.1 and 1.2, **and**  
☒ Yes to questions 1.3 and 1.4, **and**  
☒ No to **all** subsections in question 1.5.

If you have satisfied the Summary Check—**proceed to Section B2.**

**B2 SITE COMPATIBILITY CERTIFICATE REQUIRED FOR CERTAIN DEVELOPMENT APPLICATIONS**

Identify the reason why you need to apply for a Director-General's site compatibility certificate.

- 2.1. Is the proposed development for the purpose of seniors housing permissible with consent on the land under the zoning of an environmental planning instrument? (See clause 24 [1A].) ☐ Yes ☒ No
- 2.2. Is the proposed development staged development of a kind saved under the savings provisions of the SEPP? (See clause 53.) ☐ Yes ☒ No

If you have answered YES to **either** question 2.1 **or** question 2.2 your proposal does not require a site compatibility certificate. You can submit your application directly to the relevant local council.

2.3. A site compatibility certificate is required because: (see clause 24[1])

- the land adjoins land zoned primarily for urban purposes ☐ Yes ☒ No
- the land is within a zone that is identified as 'special uses' (other than land on which hospitals are permitted) ☐ Yes ☒ No
- the land is used for the purposes of an existing registered club ☐ Yes ☒ No
- the proposed development application involves buildings having a floor space ratio that would require the consent authority to grant consent under clause 45. ☐ Yes ☒ No

If you have answered NO to **all** subsections in question 2.3, your proposal does not require a site compatibility certificate.

**SECTION B2 — SUMMARY CHECK**

Continue to fill out the application form **only** if you have answered:

- ☒ No to **both** question 2.1 and question 2.2, **and**  
☐ Yes to **any** subsection in question 2.3 above.

If you have satisfied the Summary Check—**proceed to Section B3.**

**B3 TYPES OF SENIORS HOUSING**

Does the proposed development include any of the following?

If yes, please indicate in the appropriate space/s provided the number of beds or dwellings that are proposed

- A residential care facility ☒ Yes ☐ No  Beds
- A hostel ☐ Yes ☐ No  Dwellings
- Infill self-care housing (urban only and not dual occupancy) ☐ Yes ☐ No  Dwellings
- Serviced self-care housing ☐ Yes ☐ No  Dwellings
- A combination of these ☐ Yes ☐ No  Beds  Dwellings

If you answered **yes** to serviced self-care housing—**proceed to Section B4.** Otherwise—**proceed to Part C.**

**B4 'GATEWAY' FOR SERVICED SELF-CARE HOUSING ON LAND ADJOINING URBAN LAND**

If the proposed development includes serviced self-care housing on land adjoining land zoned primarily for urban purposes, will the housing be provided:

- for people with a disability? ☐ Yes ☐ No
- in combination with a residential care facility? ☐ Yes ☐ No
- as a retirement village within the meaning of the *Retirement Villages Act 1999*? ☐ Yes ☐ No

If you answered **no** to **all** questions in Section B4, it is unlikely that the proposal will satisfy the council when you submit a development application (see clause 17[2] of the SEPP) and also unlikely that a site compatibility certificate would be issued.



## PART D — CHECKLIST, PAYMENT AND SIGNATURES

### D1 APPLICATION CHECKLIST

Please check that you have provided all the information required for your application.

I have completed all sections of this application form.

☒ Yes ☐ No



I have attached supporting information. If yes, please check boxes below, as relevant.

☒ Yes ☐ No

Map and detailed description of land

☒

A copy of proposed site layout

☒

A copy of zoning extract or other evidence

☒

A copy of development control table

☒

Proposal information—context, proposal and strategic justification

☒

Additional information for statements against site compatibility criteria (optional)

☐

I have addressed the following SEPP site compatibility matters in **section C2** of the form.

☒ Yes ☐ No

1. Existing environment and approved uses

☒

2. Impact on future uses

☒

3. Availability of services and infrastructure

☒

4. Impact on open space and special uses provision

☒

5. Impact of the bulk and scale of the proposal

☒

6. Impact on conservation and management of native vegetation

☒



I have provided **three** hard copies of this form and all relevant supporting information

☒ Yes ☐ No

I have provided the application form and supporting information in electronic format

☒ Yes ☐ No

I have enclosed the application fee (see below for details)

☒ Yes ☐ No

### D2 APPLICATION FEE

You are required to pay a fee for the assessment of an application for the Director General's certificate for site compatibility. This fee is based on the estimated number of beds of the SEPP Seniors Housing Facility. The Department may require that you pay a proportion of the total fee with this application. You should consult with the Department before lodging this application to determine the proportion to be paid. The maximum fee payable is \$5000.

Number of beds or dwellings

**98**

Estimated project cost

**\$27 Million**

### D3 CERTIFICATE APPLICANT'S AUTHORISATION

By signing below, I/we hereby:

- apply, subject to satisfying the relevant requirements under State Environmental Planning Policy ((Housing for Seniors or Persons with a Disability) 2004 for a Director-General's site compatibility application pursuant to clause 50(2A) of the Environmental Planning and Assessment Regulation 2000
- provide a description of the proposed seniors housing development and address all matters required by the Director-General pursuant to clause 25(5)(b) of the State Environmental Planning Policy (Housing for Seniors or Persons with a Disability) 2004
- declare that all information contained within this application is accurate at the time of signing.

Signature(s)

*Bruce Messa*

In what capacity are you signing if you are not the owner of the land

*DIRECTOR GENERAL CONSULTING AGENT*

Name(s)

*BRUCE MESSA*

Date

*5th April 2013*

### D4 LAND OWNER'S CONSENT

As the owner(s) of the land for which the proposed seniors' housing development is located and in signing below, I/we hereby agree to the lodgement of an application for a Director-General's site compatibility certificate.

Signature

*Michael David Moore*

Name

*MICHAEL DAVID MOORE*

Date

*10/4/13*

Signature

*[Signature]*

Name

*ARCHDIOCESE OF SYDNEY*

*THE ROMAN CATHOLIC CHURCH*



*ATTORNEY & SECRETARY TO THE TRUSTEES  
OF THE ROMAN CATHOLIC CHURCH FOR  
THE ARCHDIOCESE OF SYDNEY*



## PART C — SITE COMPATIBILITY OF THE PROPOSED DEVELOPMENT

In this Part, please **attach** documentation to describe the development proposal, its context and strategic justification.

### INTRODUCTION

The subject site has previously been issued a site compatibility certificate (Appendix D), however this certificate expired in May 2012. This report provides justification for the site suitability of a 98 bed residential aged care facility as a more intense development than currently permissible under Waverley LEP 2012 Height and FSR provisions. The proposal also includes dementia places within the facility to address the growing need for these type of places as identified by the Aged Care Assessment Team (ACAT).

The proposal seeks site compatibility certification for a part 3/4/5 storey development up to a maximum height of 78.00 AHD and FSR of 1.4:1 in accordance with the proposed building envelope and design principles outlined in Part C1 of this submission.

### CONTEXT

#### Subject Site

The subject site is 367 Bronte Road Bronte:

Lot A & Lot B in DP 79074

Lots 1, 2 & 3 in DP 15249

The subject site area is approximately 4,653sqm and is currently contains two unoccupied buildings that are up to 3 storeys in height as shown in Figure 1. A copy of the Site Survey can be found in Appendix A.



FIGURE 1 - SUBJECT SITE FROM BRONTE ROAD

#### Site Location

The site is located (Figure 2) in the suburb of Bronte located in Waverley Council LGA. The topography is undulating with a local highpoint located east of the Brae Street and Evans Street intersection, a ridgeline located between Brae Street and MacPherson Street and a gully between Bronte Road and Murray Street.



FIGURE 2 - LOCAL CONTEXT (BASE AERIAL GOOGLE EARTH 2009)



## CONTEXT

### Existing Character & Heritage Items

The immediate area is a mixture of development forms, types and eras. The development land uses are predominately a mix of with residential houses (attached and detached) and residential flat buildings ranging from 2-5 storeys in height.

Estimated floor space ratios and height for three developments in the vicinity of the site (photos see Figure 3) have been calculated as follows:

Address	Estimated Site Area	Estimated GFA / Level	Height	Estimated FSR
361 Bronte Road	861 sqm	327 sqm	3 storey	1.14:1
371 Bronte Road	627 sqm	219 sqm	4 storey	1.39:1
373 Bronte Road	836 sqm	298 sqm upper levels, 120 sqm lower levels	3/4 storey	1.21:1

There are also the following Heritage listed buildings, in the immediate vicinity of the site as shown in Figure 6:

- 369 Bronte Road (Item 1274) adjoining the site (Figure 4)
- 424 Bronte Road (Item 1277) directly opposite the subject site (Figure 5).
- Properties on Evans Street adjoining the southern portion of the site (Items 1301-1303).



FIGURE 3 - 371 & 373 BRONTE ROAD (L)  
361 BRONTE ROAD (R)



FIGURE 4 - 369 BRONTE ROAD



FIGURE 5 - 424 BRONTE ROAD



FIGURE 6 - SITE CONTEXT WITH WAVERLY LEP HERITAGE MAP OVERLAY  
(BASE AERIAL GOOGLE EARTH 2009)



## CONTEXT

### Access to Services, Facilities, Transport & Open Space

Bronte Road Neighbourhood shops 100m from site and includes corner shop, hairdresser/massage, drycleaner. (Figure 7)

Waverly (Charing Cross) shops 400m from site offers a range of retail and commercial premises.

Macpherson Road Neighbourhood shops located approximately 300m from the subject site include but not limited to mixed business, doctors surgery, dentist and pharmacy. Public Open Space is located adjacent to these shops.

Bondi Junction located approximately 2km from the subject site.

Randwick Junction and Prince of Wales Hospital located approximately 3km from the subject site

A bus stop is accessible within 200m of the site (Murray Street), buses operate between Bondi Junction and North Clovelly daily.



FIGURE 7- BRONTE ROAD NEIGHBOURHOOD SHOPS



FIGURE 8 - SITE CONTEXT FACILITIES  
(BASE AERIAL GOOGLE EARTH 2009)





# BUILDING ENVELOPE

The proposal is for a part 3 / 4 / 5 storeys building, with a maximum height up to RL 78.00 AHD, see indicative site sections (Figure 6), this is greater than allowable under the maximum height zoning J2 (9.5m) in Waverley LEP 2012. The height breaching the LEP maximum height is located towards the centre of the site where the impact is less substantial when viewed from adjoining properties and Bronte Road.

The proposed building envelope comprises the following parameters.

- Provide side setbacks of a minimum of 3m.
- Provide a rear setback a minimum of 3.5m.
- Provide a front setback a minimum of 8m.
- Maximum building height RL 78.00 AHD.
- The proposed building envelope can accommodate an FSR of 1.4:1.

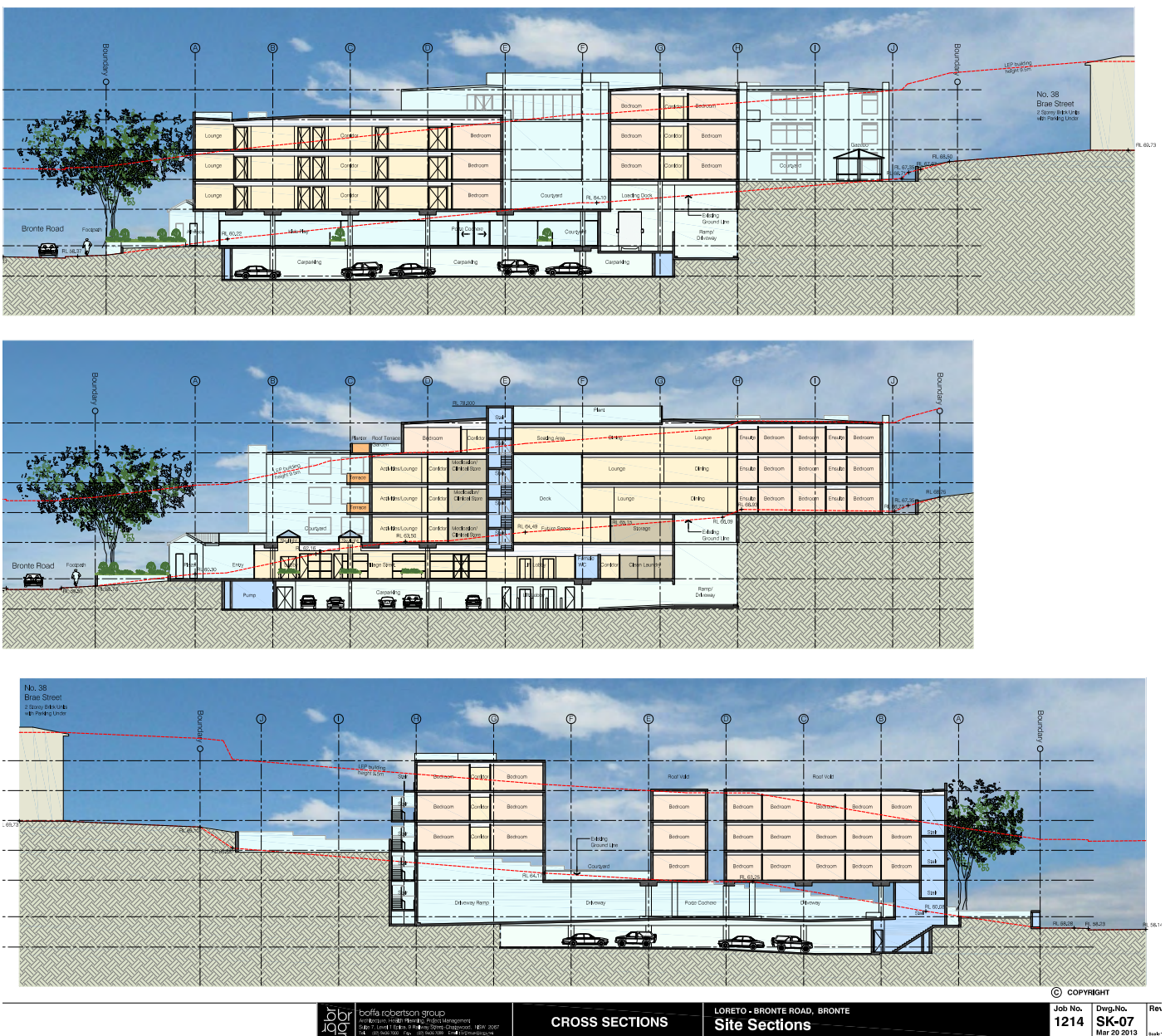


Figure 8- Indicative Site Sections (BRG)



# DESIGN PRINCIPLES

In addition to the addressed through the following design principles:

## Built Form

- Limit building height at the rear of the site to a maximum three storeys.
- Setback the rear elevation of the building from the south eastern corner to accomodate adequate building seperation from adjoining properties.
- Articulate built form to reduce apparent bulk and scale on all facade.
- Adopt a built form that facilitates view sharing with adjoining properties.
- Provide an upper level setback from the front facade to reduce scale of the building when viewed from Bronte Road.

## Open Space & Landscape

- Provide landscape areas with retention of existing trees where possible.
- Provide a front landscape setback with accessible access to the main entry of the building.
- Provide courtyards for amenity of residents, separation from boundary and to provide breaks in the building.

## Access

- Provide a single vehicular access to drop off area and parking along the western edge of the site, the location of the existing driveway.
- Access is to be provided in accordance with the relivant Australian Standards.
- Provide a well defined pedestrian entry that can be seen from the street and is accessible.

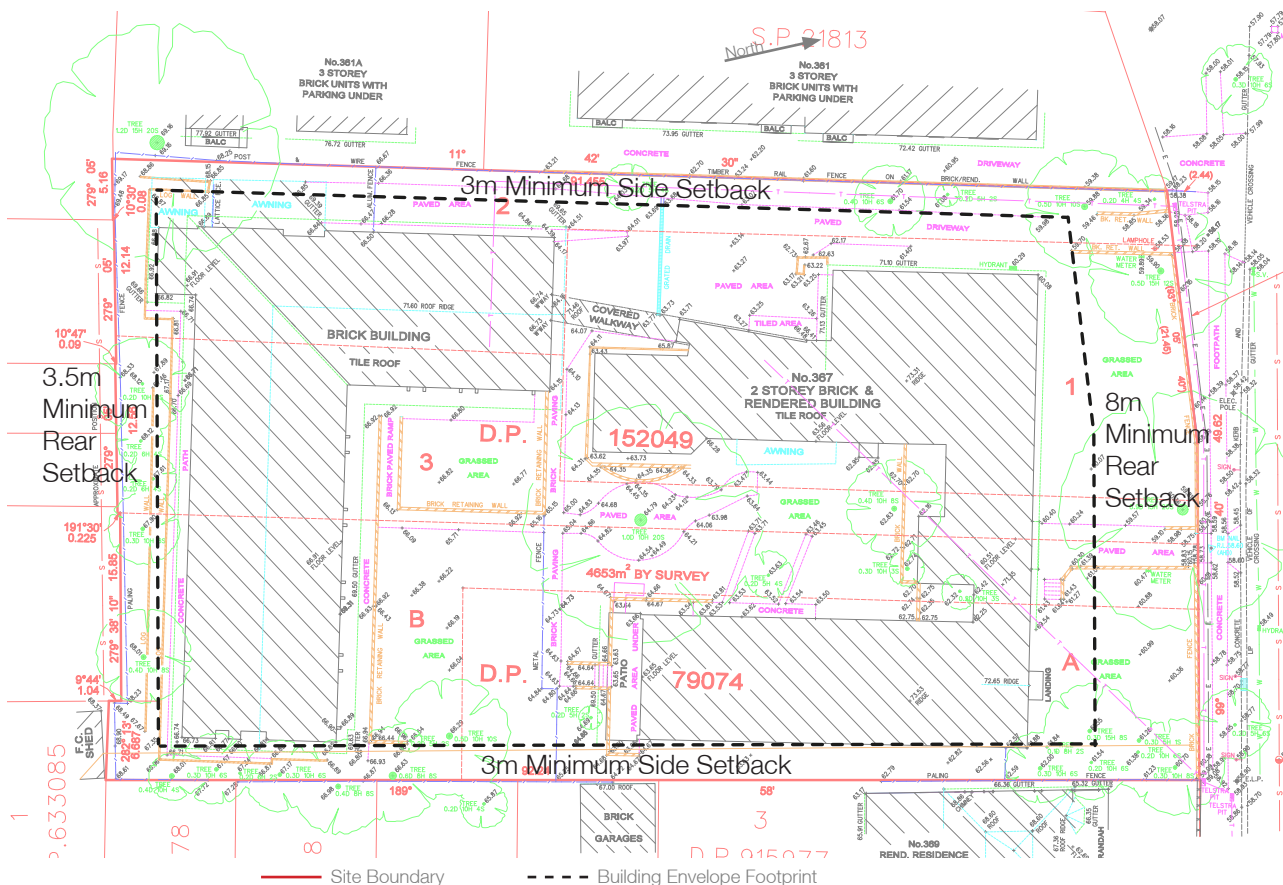


Figure 9- Survey Plan (Rygate & Company 2008) with building envelope overlay

# STRATEGIC JUSTIFICATION

## Background

The site was formally used as 98 bed Nursing home, the site has also been subject to a previous proposal for which a site compatibility certificate was issued, however has since expired. The current proposal provides a reduction in bulk, scale and density when compared to the previous scheme that which a site compatibility certificate was issued.

There is a need for Residential Aged Care Facilities with dementia places in the region as identified by Waverly Council and the ACAT. The proposal has the ability to provide new facilities to assist in addressing this growing demand.

## Location and Site Conditions

The locality offers attractive amenity for seniors housing in terms of accessibility to retail, medical services, transport and community services. There are no known on-site conditions that inhibit the development of the proposed scheme.

There is a underlying need for residential aged care facilities in the Waverly LGA with an aging population and approximately 22% of existing residents over the age of 55 (Waverley Council 2013). The provision of this facility will assist by accommodating low care, high care and dementia beds to allow residents to 'age in place'.

## Building Envelope

The building envelope adopts a front setback consistent with adjoining properties and is broadly consistent with the eastern side setback of the existing buildings. Setbacks at the rear of the site in accordance with the design principles will provide separation from existing development to the south and west.

The building envelope accommodates a density marginally greater than existing residential developments located along the southern side of Bronte Road as identified in the site context section of this submission all of which appear to be greater than what is currently permissible under Waverly LEP 2012.

The proposed density of the current proposal (FSR up to 1.4:1) is less than the proposal that which a site compatibility certificate was previously provided (FSR 1.61:1)

With regards to building height, there is significant elevational level change north-south accross the site which allows greater building height towards the centre of the site without significantly impacting adjoining properties.

## Permissibility under Waverley LEP 2012

Seniors Housing is permissible within the R3 Medium Density Residential Zone in Waverly LEP 2012 however the proposed building height, up to 14.46m above existing ground level, is greater than the maximum building height zone is J2 9.5m under the LEP. The proposed Floor Space Ratio is also greater than allowable under the Maximum Floor Space Ratio zone F (0.6:1) in the LEP.


The proposed development will address potential impacts created by additional height by locating carefully towards the centre of the site so that not to create unreasonable overshadowing or view loss.

## Pre-Lodgement Consultation

A Pre-DA meeting was held with Waverly Council on 7th February 2013, minutes of the meeting are located in Appendix E.

Wayne Williamson from the Department of Planning & Infrastructure was contacted with regards to seeking clarity on whether a site compatibility certificate was required.

## C2 STATEMENT ADDRESSING SEPP SITE COMPATIBILITY CRITERIA

 Applicants should provide a statement demonstrating whether the site is suitable for more intensive development and is development for the purposes of seniors housing of the kind proposed in the application compatible with the surrounding environment, having regard to (at least) the following matters for consideration outlined under clause 25(5)(b) of the SEPP:

**1. THE NATURAL ENVIRONMENT (INCLUDING KNOWN SIGNIFICANT ENVIRONMENTAL VALUES, RESOURCES, OR HAZARDS), AND THE EXISTING USES AND APPROVED USES OF LAND IN THE VICINITY OF THE PROPOSED DEVELOPMENT.**

The site is currently underutilised medium density residential zoned land which permits seniors living. As the site and immediate area is urban and developed, primarily for residential uses, the natural environment design considerations include:

- Existing trees on site are to be retained where practicable.
- District and ocean experienced from private domain are to be shared and no public domain views to notable features will be impacted.
- The proposed development is to be built into the slope of the site to allow efficient vertical circulation and minimise building height impacts. Provision is to be made to ensure excavation has no unreasonable impact on adjoining properties.

The proposed development is anticipated to have a positive impact on the small neighbourhood centre located within 100m of the site, resulting from the usage generated by the proposed development residents and employees. The location to this small neighbourhood centre and the residential flat buildings in the vicinity makes the site more suitable for the proposed development which is of comparable scale but greater than the Waverly LEP 2012 FSR and height controls.

**2. THE IMPACT THAT THE PROPOSED DEVELOPMENT IS LIKELY TO HAVE ON THE USES THAT ARE LIKELY TO BE THE FUTURE USES OF THE LAND IN THE VICINITY OF THE DEVELOPMENT.**

The land in the vicinity of the development is well established. On the basis of strata title, heritage and condition of development there is limited likelihood for surrounding development to change. Additionally a number of sites in the vicinity are developed to height and density greater than which is permissible under the current LEP.

**3. THE SERVICES AND INFRASTRUCTURE THAT ARE OR WILL BE AVAILABLE TO MEET THE DEMANDS ARISING FROM THE DEVELOPMENT (PARTICULARLY, RETAIL, COMMUNITY, MEDICAL, AND TRANSPORT SERVICES HAVING REGARD TO THE LOCATION AND ACCESS REQUIREMENTS SET OUT IN CLAUSE 26 OF THE SEPP) AND ANY PROPOSED FINANCIAL ARRANGEMENTS FOR INFRASTRUCTURE PROVISION.**

The services and infrastructure in the vicinity of the site are adequate and accessible as required in Cl. 26 of the SEPP. Additionally the site was previously used as a 98 bed nursing home.

The MacPherson street retail currently has medical facilities including GP, dentist and pharmacy. More significant medical facilities are located in Bondi Junction. In addition to existing services and infrastructure a cafe and general store will be provided on site along with rooms for GP and Allied health professionals.

Existing public bus stops are located on Murray Street and MacPherson Street 360 Route Bondi Junction - North Clovelly operates daily. Additionally it is proposed that the facility will provide transport for residents using its own bus.

The proposed land use results in a low traffic generation and would not have significant effects on the operation of the surrounding road network.

**4. IN THE CASE OF APPLICATIONS IN RELATION TO LAND THAT IS ZONED OPEN SPACE OR SPECIAL USES—THE IMPACT THAT THE PROPOSED DEVELOPMENT IS LIKELY TO HAVE ON THE PROVISION OF LAND FOR OPEN SPACE OR SPECIAL USES IN THE VICINITY OF THE DEVELOPMENT.**

Not applicable, land is currently zoned residential. The site and adjoining properties are developed for residential purposes.

## C2 STATEMENT ADDRESSING SEPP SITE COMPATIBILITY CRITERIA



Applicants should provide a statement demonstrating whether the site is suitable for more intensive development and is development for the purposes of seniors housing of the kind proposed in the application compatible with the surrounding environment, having regard to (at least) the following matters for consideration outlined under clause 25(5)(b) of the SEPP:

5. WITHOUT LIMITING ANY OTHER CRITERIA, THE IMPACT THAT THE BULK, SCALE, BUILT FORM AND CHARACTER OF THE PROPOSED DEVELOPMENT IS LIKELY TO HAVE ON THE EXISTING USES, APPROVED USES AND FUTURE USES OF LAND IN THE VICINITY OF THE DEVELOPMENT.

The existing buildings on the site have a facades that are homogenous in appearance and including a wide front facade spanning the majority of the width of the site. The proposal will improve the appearance of built form on the site by retaining well defined landscape setbacks for all boundaries, replacing existing homogenous built form with a new building containing well articulated facades to reducing the apparent bulk and scale of the building.

The proposed building height is consistent with other buildings along Bronte Road and the proposed design also reduces the apparent building scale by utilising the topography of the site. The topography, along with the building orientation assists in limiting the impact of shadowing adjoining properties.

The retention of trees in the front setback contribute to the appearance of the streetscape and reduces the apparent bulk and scale of the proposed built form on the streetscape and for residents viewing the site from the north.

The proposed development will be visible when viewed from development located immediately to the south, however the apparent scale of the proposal is reduced due to their higher elevation.

The proposed development will not result in any substantial adverse impact on the heritage values of the precinct, including those listed as heritage items under Waverly LEP 2012.

6. IF THE DEVELOPMENT MAY INVOLVE THE CLEARING OF NATIVE VEGETATION THAT IS SUBJECT TO THE REQUIREMENTS OF SECTION 12 OF THE *NATIVE VEGETATION ACT 2003*—THE IMPACT THAT THE PROPOSED DEVELOPMENT IS LIKELY TO HAVE ON THE CONSERVATION AND MANAGEMENT OF NATIVE VEGETATION (NB: *THIS CRITERIA DOES NOT APPLY TO LAND IN URBAN LOCAL GOVERNMENT AREAS OR URBAN ZONES LISTED UNDER SCHEDULE 1 OF THE NATIVE VEGETATION ACT 2003*).

No native vegetation clearing is proposed.

## CONCLUSION

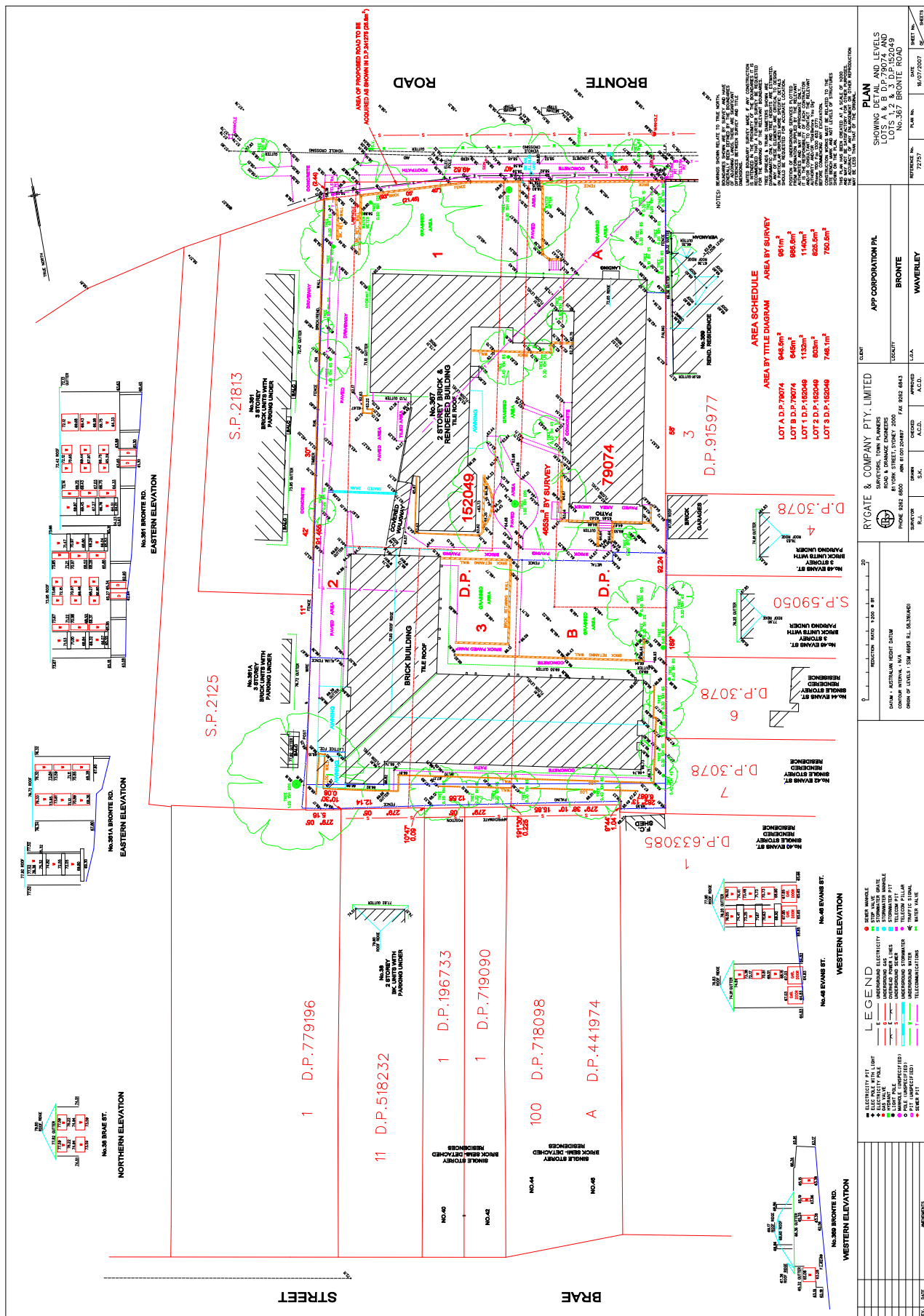
The proposal addresses potential impacts of a development greater than what is allowable under the current Environmental Planning Instrument by providing a building envelope and design principles to form the basis for a development application. The scale of this proposal is similar to existing developments in the vicinity of the site that exhibit a built form greater than allowable under the current environmental planning instrument.

Based on the need for this type of facility in this locality, desirable existing conditions and proposed design principles that limit impacts on existing development, the proposed scale is highly suitable for this site and will offer an improvement to the existing streetscape.

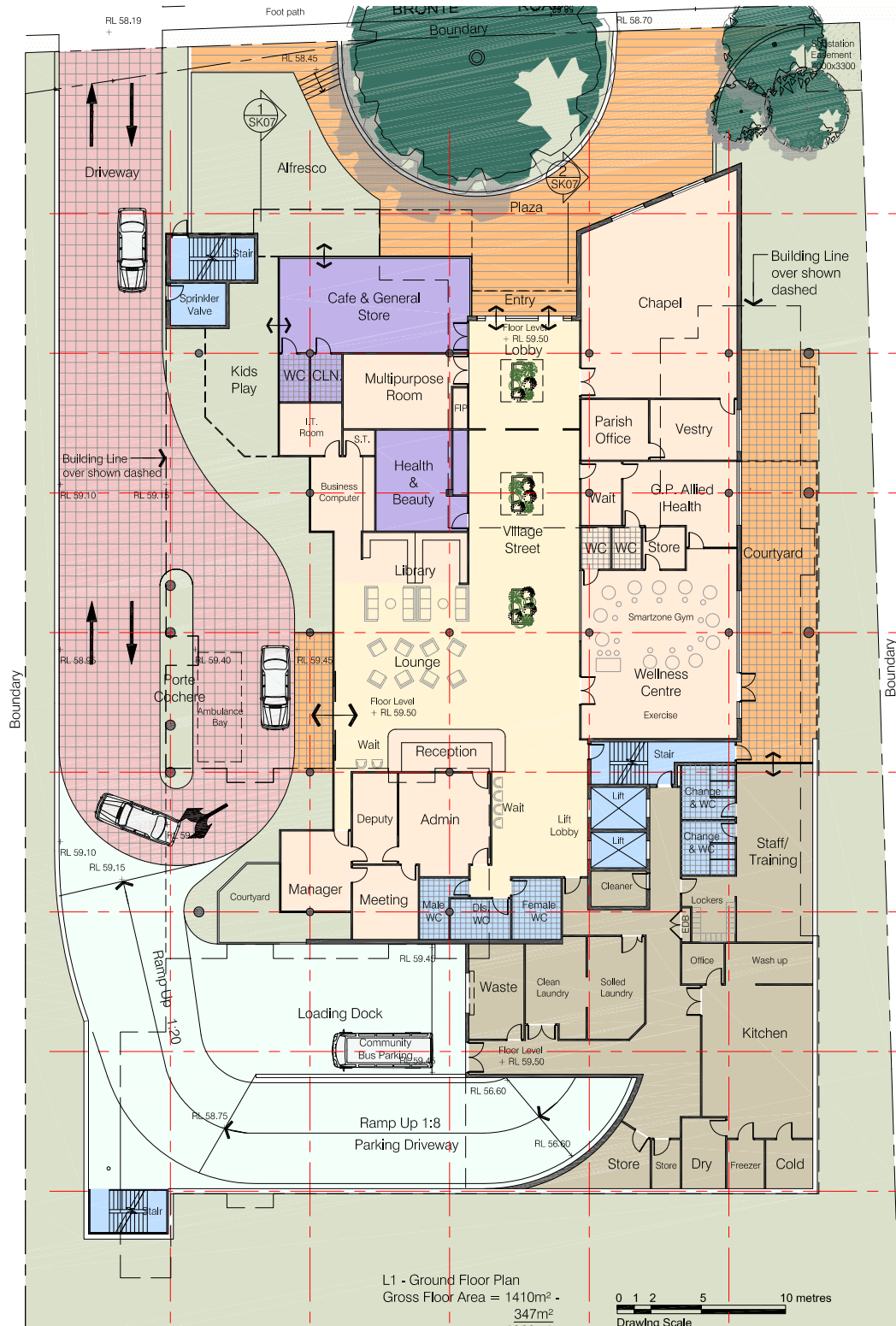
In addition to addressing all of the criteria of CI25(5)b of the the SEPP, the building envelope accommodating a building with an FSR up to 1.4:1 utilising a stepped building height up to a maximum 78.00 AHD is suitable for the site and meets the SEPP criteria for site compatibility certification.



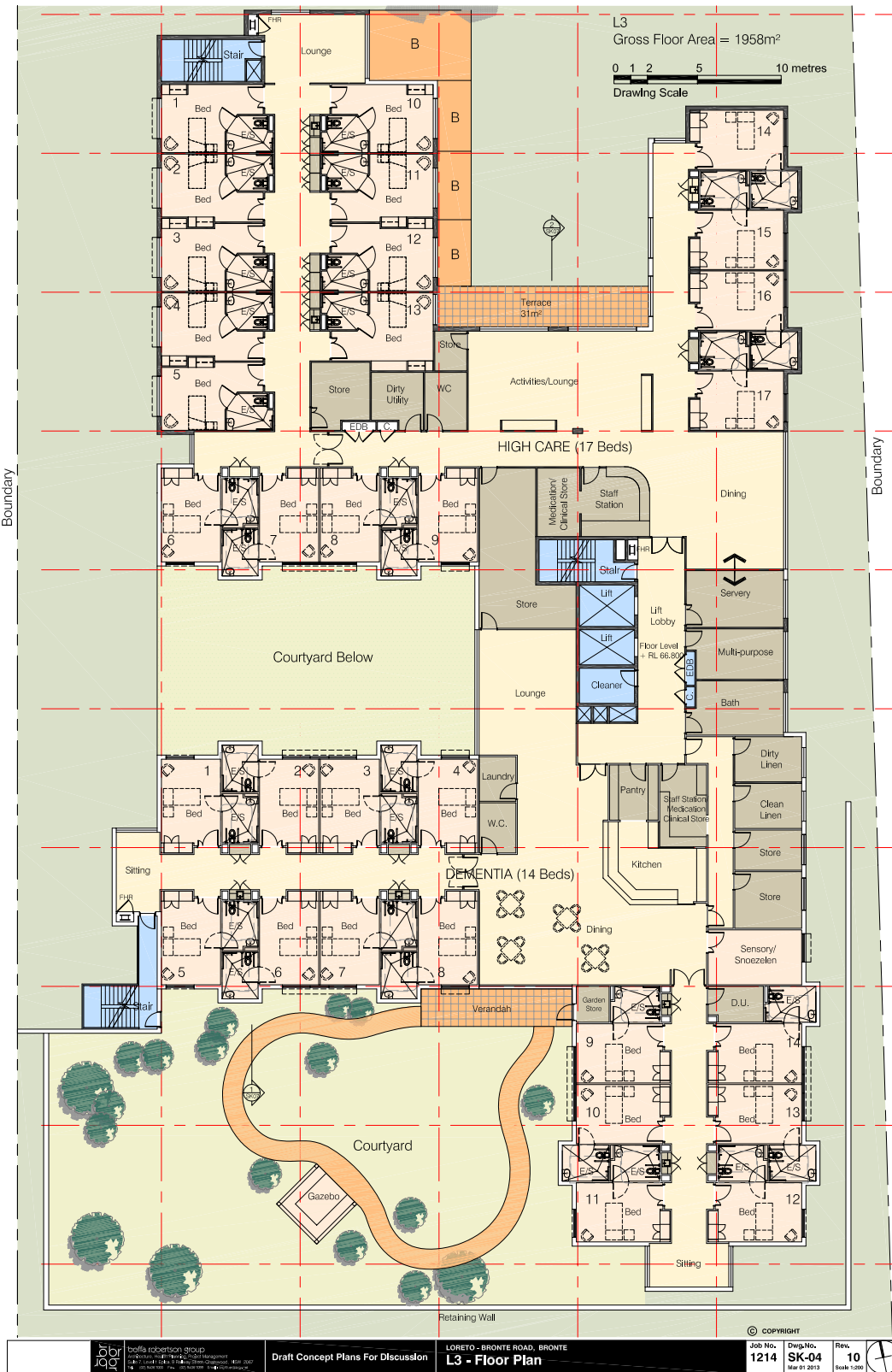
# Appendix A - Site Survey



# Appendix B - Concept Design Layout





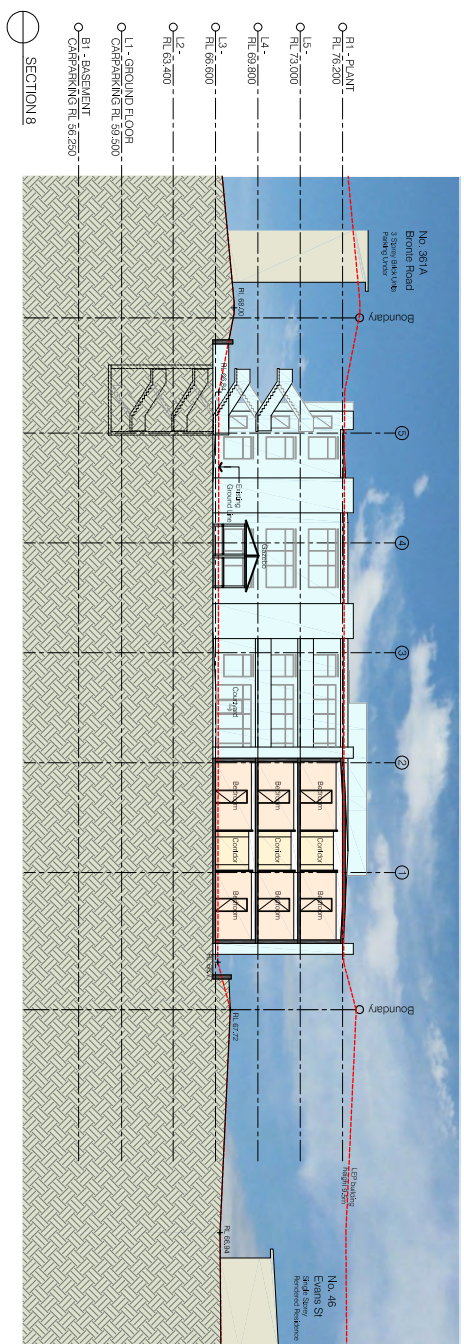
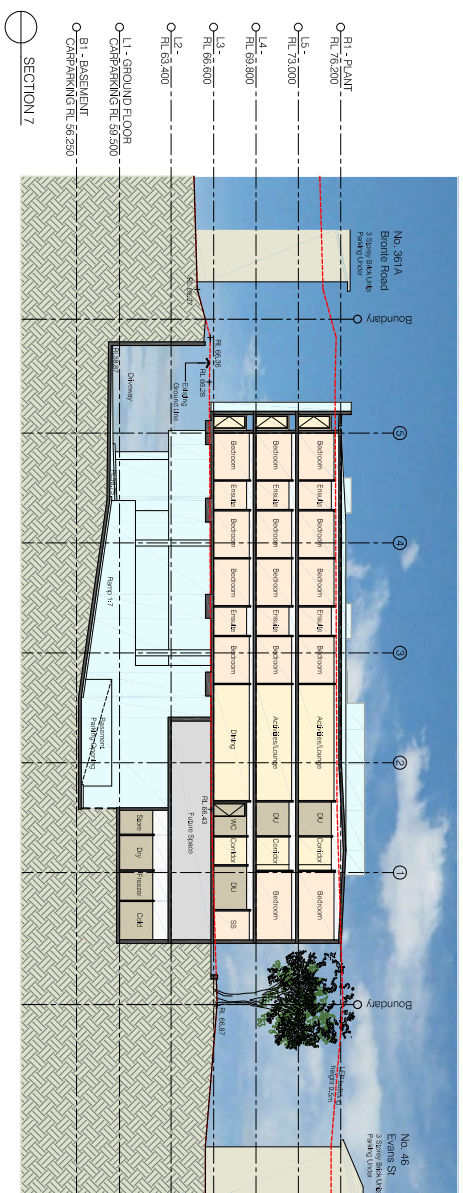






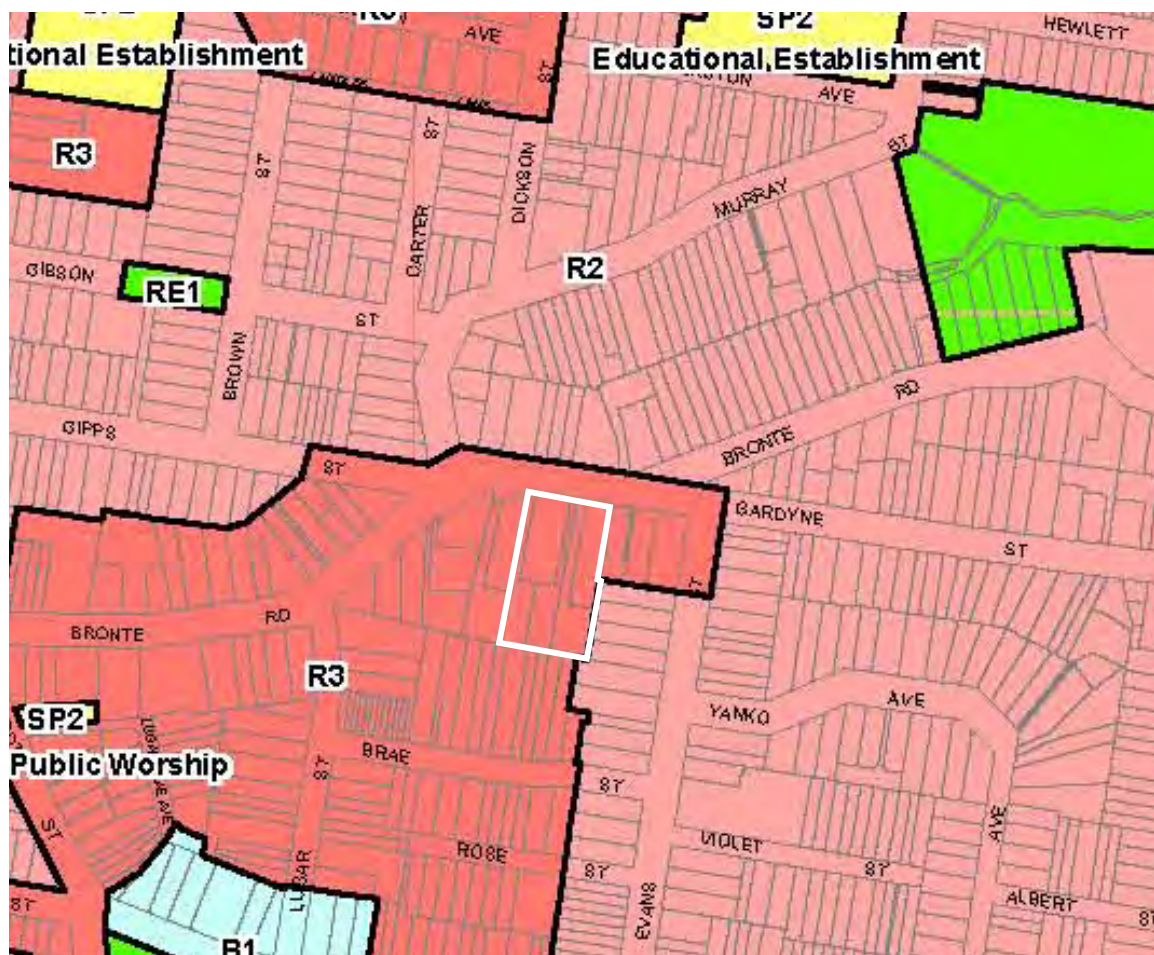








# Appendix C - Waverley LEP 2012 - Zoning extracts & Development Control Table



Extract Waverley LEP 2012 - Land Zoning Map LZN\_004

## R3 - Medium Density Residential Objectives & Land Use Table

### Zone objectives:

- To provide for the housing needs of the community within a medium density residential environment.
- To provide a variety of housing types within a medium density residential environment.
- To enable other land uses that provide facilities or services to meet the day to day needs of residents.

### Permitted without consent

#### Home occupations

### Permitted with consent

Attached dwellings; Bed and breakfast accommodation; Boarding houses; Building identification signs; Business identification signs; Child care centres; Community facilities; Group homes; Home industries; Kiosks; Markets; **Multi dwelling housing**; Neighbourhood shops; Places of public worship; Respite day care centres; Roads; **Seniors housing**; Any other development not specified in item 2 or 4

# Appendix D - Previous Site Compatibility Certificate



## Office of the Director General

Mr Peter Lee  
Project Director  
APP Corporation Pty Limited  
Level 6, 53 Berry Street  
NORTH SYDNEY NSW 2060

Our ref: PCU001451

File: S09/01494

Dear Mr Lee

**Subject: Determination of Application for a Site Compatibility Certificate, State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004**

I refer to your application of 11 December 2009 for a site compatibility certificate under clause 25 of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 ('the SEPP') in relation to the proposed seniors housing development at 367 Bronte Rd, Waverley.

I have made the determination to issue the site compatibility certificate under clause 25 (4) (a) of the SEPP on the basis that the site of the proposed development is suitable for more intensive development and that development for the purposes of seniors housing of the kind proposed in the application is compatible with the surrounding environment, having had regard to the criteria specified in clause 25 (5) (b). Please find the Determination of Certificate of Site Compatibility attached.

Whilst I have decided to issue the certificate, I have imposed requirements on the determination to highlight the need for suitable design amendments to be made to the proposed development. This is in order to address issues relating to the design of the residential care facility. The requirements also aim to ensure an appropriate physical separation of the residential care facility and the self contained dwelling complex, in order to improve the residential amenity for residents of each building. In addition, I have required that pedestrian safety and adequate vehicular access to and from the site being satisfactorily resolved.

I note that Waverley Council has deferred the assessment of the development application for the proposal, until numerous issues have been addressed. I have arranged for Michael File, A/Regional Director, Sydney Region East to advise Waverley Council of the outcome of the Site Compatibility Certificate application and to request that Council deal expeditiously with the development application, following your submission of amended plans which resolve the issues as outlined in the attached certificate and this letter.

Should you have any further enquiries about this matter, I have arranged for Ms Rosalind Louis, Team Leader, Sydney Region East, to assist you. Ms Louis may be contacted at the Department's Bridge St Office on telephone number (02) 9228 6419.

Yours sincerely

*SHaddad*  
**Sam Haddad** —  
Director General

6/5/2010

## Seniors Housing Determination of Certificate of Site Compatibility

Part 1A of *State Environmental Planning Policy* (Housing for Seniors or People with a Disability) 2004

I, the Director-General of the Department of Planning, pursuant to clause 25(4)(a) of the *State Environmental Planning Policy* (Housing for Seniors or People with a Disability) 2004, determine the application made by APP Corporation on 11<sup>th</sup> December 2009 by issuing this certificate.

I certify that in my opinion :

- the site described in Schedule 1 is suitable for more intensive development; and
- the development described in Schedule 2 is compatible with the surrounding environment, having had regard to the criteria specified in clause 25(5)(b).

Under clause 25(7), this certificate is only valid in relation to development that satisfies the requirements specified in Schedule 2 of this certificate.

  
**Sam Haddad**  
Director-General  
Department of Planning

Date certificate issued: 6<sup>th</sup> May 2010

**Please note:** This certificate will remain current for 24 months from the date of issue.

### SCHEDULE 1

**Site description:** Lot A DP79074, Lot B DP79074, Lot 1 DP152049, Lot 2 DP15049, Lot 3 DP15049 at 367 Bronte Road, Waverley NSW 2024 (Waverley LGA)

### SCHEDULE 2

**Application made by:** APP Corporation on behalf of Catholic Archdiocese of Sydney

**Project description:** Calvary Aged Care Facility for Calvary Loreto Retirement Community - Demolition of existing buildings on site and the development of a new seniors housing complex comprising:

- a building containing a 99 bed Residential Care Facility, and
- the construction of a new building containing 14 self-contained dwellings.

### Requirements imposed on determination:

1. Design amendments be made to the proposed development generally consistent with the built form, open space, landscaping and elevational treatment principles outlined in the Urban Design Review (February 2009) undertaken by LFA (Pacific) Pty Ltd to address:
  - a. the massing and bulk of the RAC building;
  - b. the impact on adjoining properties with regard to the potential for overshadowing and overlooking;
  - c. the location of the buildings on the site and the appropriate physical separation of the buildings to improve the plaza area and the residential amenity for the future occupants.
2. Pedestrian safety and adequate vehicular access to and from the site being satisfactorily resolved.



# Appendix E - Pre-DA Minutes Waverley Council

PD-32/2012  
25 February 2013

Premier Consulting Australia Pty. Ltd.  
c/- Mr Robert Goff  
Level 5, Gold Fields House  
1 Alfred Street  
Sydney NSW 2000



Dear Sir

**363-367 BRONTE ROAD, BRONTE, NSW 2024**

**NEW AGED CARE LIVING DEVELOPMENT**

I refer to our recent meeting on 7 February 2013 regarding your proposal to demolish buildings on the site, construct a 4-5 storey aged care development comprising of 98 beds, chapel, café and ancillary services with basement and ground level parking for 46 vehicles at 363-367 Bronte Road, Bronte.

The advice provided below is based on the plans and documentation prepared by 'Boffa Robertson Group', Job No: 1214 dated May 21 2012, received to Council on 5 December 2012.

A preliminary review of the scheme was undertaken including a site inspection. The issues considered below are for your assistance in the preparation of any future development application for the site.

The advice in no way restrains the discretion of Council in the assessment and determination of any future development application/s for the site. Other issues may arise which were not identified in this correspondence due to public consultation, specialist review and consideration of a complete development application.

This advice is the professional opinion of those present at the meeting and in no way represents the view of the elected Council. Further, as the cost of works is likely to exceed \$20m, the determination will be made by the Joint Regional Planning Panel (JRPP).

If you have any further queries in relation to this matter, please contact me on 9369 8052.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Angela Rossi'.

**Angela Rossi**  
Senior Assessment Planner

## **CONSIDERATION OF THE SCHEME**

The following assessment has been made without notifying the adjoining or affected properties and does not take into account future objections which may arise. The proposal is still in the early design stages with guidance sought primarily regarding the building envelope controls for the site. The advice provided below is intended to assist the applicant in further developing the design scheme for the site ensuring key elements are considered and incorporated into such project.

Overall, the proposal in seeking 98 beds for low – high care aged care patients is compatible with the former use of the site and provides a much needed service to the community. In theory, the proposal for an aged care facility is supported.

### **Planning Controls**

#### ***1. State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004***

It is noted that the application will be submitted and assessed under the above Policy and that you have undertaken a preliminary assessment of the proposal in regard to the Policy. As such, the lodgement of the application will require a detailed analysis of the proposal against the Policy and will be more thoroughly assessed at that time.

Notwithstanding this, it is understood based on the information provided, that the proposal is sought as a 'Residential Care Facility'. However, as the proposal seeks a FSR of approximately 1.35:1 (applicant's figure) and the R3 zone has a control of 0.6:1 FSR, the proposal is also considered to be a 'Vertical Village' as outlined in clause 45 of the SEPP. According, clause 24 of the SEPP is also relevant in that a Site Compatibility Certificate is required.

Should this issue need further clarification, it is recommended you seek your own legal advice on the matter.

#### ***2. State Environmental Planning Policy SEPP 55 and Contaminated Land Management Act***

The provisions of the SEPP will need to be considered to whether the land is contaminated. As such, consideration to the hierarchy of assessment is necessary and may include, though not limited to:

- Preliminary Environmental Site Assessment (PESA);
- Detailed Environmental Site Assessment (DESA);
- Remediation Action Plan (RAP);
- Validation Assessment;
- Site Audit Statement (SAS)

If the site is found to be contaminated, then the above specialist reports are required to be submitted with any future development application.

#### ***3. Waverley Local Environmental Plan 2012***

- Land Use Table
  - R3 Medium Density Residential zone – Seniors housing is permissible in the zone.

- Clauses 4.3(2) – Building Height
  - R3 zone: Maximum height of 9.5m.

Overall, the proposal exceeds the height control. However, the controls contained in the SEPP will need to be considered in this respect as the higher statutory power.

- Clause 4.4 – Floor Space Ratio
  - R3 zone: Maximum FSR of 0.6:1

Overall, the proposal exceeds the FSR control. However, the controls contained in the SEPP will need to be considered in this respect as the higher statutory power.

- Clause 4.6 – Exceptions to development standards
  - If an exceedance in development standards is sought, then an exception would be required under this clause. The scheme would need to satisfy the public interest and/or public benefit test to support the exceedance.
- Part 5 – Miscellaneous provisions
  - Clause 5.3 – Development near zone boundaries, Clause 5.9 – Preservation of trees or vegetation, Clause 5.10 – Heritage Conservation and Schedule 5 – Environmental heritage apply.
  - The trees located at the front of the site are listed on Council's Significant Tree Register and should be retained and protected.
  - The site is not heritage listed nor located within a heritage conservation area, however does directly adjoin both. Accordingly, consideration to the heritage provisions is required to ensure the works do not impact on the heritage significance of the adjoining sites.
- Part 6 – Additional Local Provisions
  - Clause 6.2 'Earthworks' and Clause 6.5 'Active Street Frontages' apply.

#### ***4. Waverley Development Control Plan 2012***

- Part A - Preliminary Information: provides details on submission requirements.
- Part B – General Design Provisions: provides details on various other design considerations relevant to any application.
- Part C2 - Multi Unit and Multi Dwelling Housing: provides controls for the residential components of the application.



## **Merit considerations**

### ***Building size, separation, setbacks, height etc.***

The documentation submitted for review is very limited in detail and offers little information about the context of surrounding properties and existing vegetation on the site. It is therefore difficult for Council to make informed decisions based on the limited information provided. Nonetheless, the scale of the proposal is considered to respond more favourably to the site than previous development proposals sought. The setbacks appear reasonable and the scale of the development employing a transition in height along the slope of the land is positive.

Upon further developing the scheme, it is recommended that a detailed contextual analysis including review of adjacent heritage significant lots, view analysis from adjoining properties and consideration to the existing vegetation of the site occur. It would also be useful if the relative height and siting of existing buildings on the site were transposed onto proposed elevations and site plan.

These matters are fundamental in the next stages of the design process to ensure an acceptable bulk and scale of the development results.

Any proposal to exceed the height and gross floor area controls outlined in the LEP will require justification against the exceptions clauses (cl 4.6) of the LEP to allow a variation to development standard.

### ***Overshadowing***

The adjoining buildings must receive solar access per Part C Clause 2.15(d) which states that direct sunlight to north facing windows of habitable rooms and private open space areas of adjacent dwellings should not be reduced below 3 hours between 9am and 3pm in mid winter. Elevational shadow diagrams will also be required.

As per DCP Part C Clause 2.15(a) direct sunlight must be attained to the living rooms and private open spaces of 70% of apartments within the development for a minimum of 3 hours between 9am and 3pm in mid winter.

A step effect to the rear of the building should be considered to provide a transition to the heritage conservation area and minimise the overshadowing impact of the proposal or maintain the status quo of the existing buildings.

### ***Architectural resolution***

Advice from Council's Heritage Architect and Urban Planning Advisor is attached for your perusal to this letter and should be considered in the progressing of the design stages of the proposal.

### ***Older People and Access Provisions***

Advice from Council's Senior Community Worker (Older People and Access) is attached for your perusal to this letter and should be considered in the progressing of the design stages of the proposal.

provide a mini ecosystem within the urban environment; therefore it is beneficial to retain as many mature plantings as possible.

- Any proposed design shall be mindful of the distance that fig tree roots can travel and the damage that can occur. Any proposal shall therefore incorporate design methods to reduce any damage to the fig tree at the rear of 361 Bronte Rd and protect the proposed building from future damage.
- Trees at the rear of the property are considered a weed species but they are well established and provide a screening between the properties at the rear in Brae St. Any construction on this site should be designed to retain the trees (selected) along this rear boundary. It is recommended that the proposed building envelop (for above or below ground construction) does not extend past the existing rear wall of this building.
- Selected trees on the western boundary are to be retained to allow for screening between the 2 boundaries to occur. The size of the garden bed along this boundary should not be reduced in width at all and plantings could also be extended in a southerly direction. Ground levels of this garden should also be retained. (This garden could remain undisturbed during development process)
- The Eucalyptus species at the front of the property is to be retained and protected throughout this development. Any proposed design shall ensure that there is no mechanical work conducted within 8 metres from the middle of the trunk of the tree (both above and below ground). Soil levels are also not to be changed around the base of this tree. If the existing path on the eastern side of the tree is to be removed there will be a requirement to fill the area with a structural soil to arboricultural specifications.
- Soil levels shall not be changed around any of the trees to be retained. Any design must take this factor into account.
- It will be required that a tree management plan be presented as part of this development application to detail the care and maintenance of the trees to be retained during the course of demolition/construction and their continued maintenance after the process is completed. Any report shall also outline tree protection zones and protection measures for the trees to be retained. A consulting arborist is retained for the length of the project
- It is preferable that all vehicle access to the buildings and underground parking is limited to one side of the property. Any entry on the western side of the property should allow for the retention of the *Grevillea robusta* situated on the front boundary, western side.
- The height of the existing retaining wall at the front of the property is not to be altered. If it is to be replaced a management plan to protect any existing trees on the site is to be presented to Council for approval. The plan shall describe the work processes/method involved in the replacement of the wall in relation to the care and maintenance of the trees.

It is also recommended you review the previous redevelopment proposal for the site (DA 485/2008) in relation to the comments received by Council's Tree Management Officer to further assist with the landscape provisions for the site (copy attached for your perusal).

## ***Privacy***

Sightlines to the principal living and sleeping areas of adjoining properties is to be considered and demonstrated in any future application, as well as sightlines to and from the existing main building form.

The provision and design of balconies and roof terraces should consider potential privacy and overlooking impacts and utilise screening where possible. Furthermore, new openings should be designed to be offset from neighbouring properties, to minimise privacy concerns (particularly to east and south elevations).

The proposed roof terraces need to carefully consider associated privacy impacts, particularly with overlooking and acoustic impacts where setbacks and planting will assist to minimise such impacts.

## ***Vehicular access / Parking / Bicycles***

Details are required to be shown on plan, clearly indicating the facilities for residential parking, café and chapel parking, accessible parking, visitor parking, loading facilities and bicycle parking that meet the standards of the SEPP, DCP and BCA.

Car parking should be located underground. While it may be acceptable for the inclusion of loading bays, ambulance parking and drop off zones at ground level, all café, chapel, residential and visitor parking should be located in the basement carpark. If no physical resolution is achievable, a minimal parking requirement would be accepted.

A traffic and parking report, prepared by a suitably qualified and experienced traffic engineering consultant will need to accompany any development application.

Carpark layout is to comply with AS 2890.1:2004 Off Street car parking.

The plan shall indicate service vehicle size and show swept wheel path when entering and exiting the loading dock.

The ramp leading to the Plaza is to serve pedestrian access only.

Further, the car parking allocations dedicate a significant amount of parking to the residential component, and less so for visitor uses. In this respect, compliance with services and visitor parking should be demonstrated with the reduction in parking occurring to the residential component of the development.

## ***Stormwater***

An on-site detention system is required and details prepared by a suitably qualified expert should be prepared as part of any future application, addressing the provisions in Part B5 of the DCP.

## ***Environmental Health***

### ***Noise***

Acoustic report for proposed use is required.

All plant and equipment to be in an acoustically treated plant room and not located on the roof.

Noise management plan is required for construction sites (demolition, excavation and construction).

#### *Food Provisions/Café*

Grease trap locations are not to be in areas where food, equipment or packaging materials are handled or stored. Comply with Sydney Water requirements.

Comply with AS 4674-2004 "Design, Construction and Fitout of food premises".

Adequate provisions shall be made for the installation of a mechanical exhaust system for cafe where food is prepared, including provisions of a shaft that complies with the BCA, to the roof for the ductwork and the flue of the system

#### *Medical waste, Clinical waste & Sharps*

Authorised waste disposal contractor to dispose of medical waste and sharps.

#### **Waste**

- The applicant must provide 3 x 660L bins for garbage, 1 x 660L bin for paper recycling and 1 x 660L bin for commingled recycling for collection twice per week.
- The basement carpark store must provide adequate storage space to accommodate these bins;
- The applicant must enter into a commercial waste collection contract for the collection of these bins.
- The waste storage areas must be banded to the sewer and be equipped with a supply of hot and cold water mixed through a centralised mixing valve with a hose cock.
- The waste and recycling storage areas must be able to accommodate all bins, with all bins simultaneously accessible.

#### ***Ecologically Sustainable Development (ESD)***

The significant redevelopment proposed for the site presents an opportunity for ESD principles to be utilised beyond the requirements of BASIX and Green Star Environmental Rating Scheme and should be investigated. There are no details shown on the initial plans reflecting how the environmental footprint of the building is being reduced.

#### ***Public Art***

Consideration should be given to incorporating Public Art into the new development. The 'Public Art in the Private Domain Guidelines' can be viewed on Council's website and by liaising with Council's Cultural Development Officer.

#### ***Attachments:***

- Referral advice from Council's Heritage and Urban Design Advisor on the proposal.
- Referral advice from Council's Senior Community Worker (Older People and Access) on the proposal.
- Referral advice from Tree Management Officer's in relation to the previous development application for the site (DA 485/2008).



- List of general requirements for the Tree Impact Assessment report.
- Copy of the assessment for the Significant Tree Register of the large Eucalypt tree at the front of the site.

**End of Advice**

**Memo**

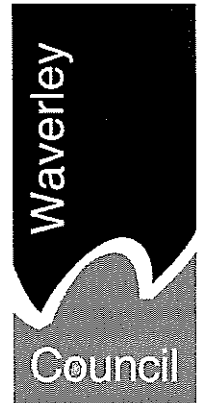
**TO:** Angela Rossi - Development Assessment

**FROM:** Chris Bath, Senior Community Worker (Older People & Access)

**SUBJECT** Pre DA Loreto 363-367 Bronte Rd, Bronte

**FILE:** PD 032/12

**DATE:** 1/2/12



The following is offered by way of comment on the above referenced Pre-DA for Loreto – Residential Aged Care facility.

The application proposes replacing the existing vacant, 99 bed, residential aged care facility with a new 98 bed residential facility over four levels with a basement car park. The facility will consist of 66 beds for high and low care and 32 beds which can provide dementia specific accommodation.

**Background**

Waverley has an ageing population. The 2011 census data shows that the number of retirees in Waverley's has grown and the proportion of the frail aged remains higher in comparison to other areas.

- 6.6 % of Waverley residents are aged 70 -84 years compared to 7.2 % in Greater Sydney
- 2.2% of Waverley residents are aged 85 years and over compared to 1.8% in Greater Sydney
- Community demand is for greater choice and flexibility in relation to aged care to meet individual needs, cultural needs and preferences. Whilst in recent years, there has been an increased demand for and availability of in-home care services, the retention of both low and high care residential places in the eastern suburbs remains important to support older residents who need both care and accommodation to remain living in the Waverley LGA or close by.
- The Aged Care Assessment Team (ACAT) report a high and growing need for specialist, secure dementia places within residential facilities in the eastern suburbs
- There is also a high need for respite beds, offering short stay and longer term respite to support carers looking after people with increasing care needs in the community.
- Whilst many people will be in a financial position to afford a range of extra services, affordable accommodation and support is consistently identified by the community as a concern for many older people in Waverley. The Aged Care Assessment Team (ACAT) also continues to report the need for more concessional places for lower income residents in the area.

**Support services and management**

- An ageing in place approach to care which includes low, high and dementia care places is noted and supported.
- The potential to provide a day respite centre is also noted and supported
- Consideration of options to provide affordable accommodation and support for people with limited income would be most welcomed.

- It is suggested that the applicant provide a social impact statement detailing their service. For example, information about proposed staffing arrangements (ratios and facilities) should reflect the higher needs of residents with dementia.

### **Building plan, amenities and facilities and design**

- The plan and social impact statement should reference best practice design for aged and dementia care in residential facilities, such as: safety and security, ease of mobility, provision of clear visual cues to minimise disorientation, a home-like environment, appropriate privacy, facilities for visitors, provision for planned and safe wandering, access to facilities and activities, and opportunities for socialisation with other residents.
- It is important that residents and their visitors have access to intimate spaces for privacy in both private and communal spaces both indoors and outdoors. The design should also allow for people with dementia to safely wander and easily find their way.
- Direct access to nature and green space is important for people's health and wellbeing, in addition to the ability to view the natural environment in the distance. The inclusion of outdoor spaces on each floor and walking circuits is noted and supported.

### **Disability access**

- The proposal is required to meet relevant Australian standards for disability access and mobility. The DA should be assessed against requirements for adaptability and accessibility in Council's DCP, the BCA and Access to Premises Standards
- It is recommended that an Access Specialist is engaged to conduct an access audit and to provide advice on detailed design elements, such as bathroom fit outs, outdoor areas and safe pedestrian pathways. Key design features for accessibility include:
  - Level access from the footpath to the primary entrance of the building.
  - Accessible entrances, adequate circulation spaces within rooms, and a continuous path of travel to and from essential amenities and facilities to meet the needs of people who use wheelchairs or mobility scooters.
  - Ensuring adequate widths of pathways and corridors to enable passing and turning spaces for users of wheelchairs or mobility scooters.
  - Doors that are easy to open and enter such as installation of automatic doors and accessible lift to connect each floor
  - Provision of accessible toilets in communal areas, and accessible toilets and showers within accessible bedrooms.

### **Amenities and facilities**

- Facilities such as meetings rooms available for use by community groups is most welcomed
- The wellness centre, library area, and hair and beauty salon are noted and supported. These facilities are important to support the health and wellbeing of residents.
- The inclusion of a café and outdoor seating area is noted and supported, such areas support social interaction and assist to entertain visitors
- A GP / allied health room will enable visits from health specialists such as podiatrists and dieticians and this is supported



**Location and access to community services, facilities and transport**

- The location of the facility is in close proximity to public transport, shops, cafes and other community facilities, which could be accessed by mobile residents of the facility, and their visitors.
- Retail, community and medical services are available in Bondi Junction and a pharmacy, newsagent and post office are located in the nearby Charing Cross village.

**Parking**

- Parking space located close to the community use area and entrance which is wide enough for pick up and drop off by a community bus or wheelchair taxi is noted and supported
- Two mobility car parking spaces with a shared area in the basement area noted and supported. The location close to the lift entrance to the building is well placed.
- Separate pedestrian and vehicle access is noted and supported.

Yours sincerely

Chris Bath

Senior Community Worker Older People and Access



**ae**design partnership  
architecture + environment

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