APPENDIX C: CONSIDERATION AGAINST EPIS

SEPP 65 Design principles and ADG

An assessment of the proposal against the design principles in SEPP 65 is provided in **Table 1** below.

Table 1: Compliance with the Principles of SEPP 65

Key Principles of SEPP 65	Department Response
Principle 1: Context	The proposed modifications to the Concept Plan and Project Approval are consistent with the height controls outlined in the SPP SEPP and provide an appropriate response to the varied built form in the locality. In addition, subject to the recommended conditions of approval, the proposed modifications will not have any detrimental impacts on the amenity of the adjoining buildings.
Principle 2: Scale	The proposed modifications are consistent with the height limits outlined in the SPP SEPP and respond to the height and scale of buildings in the locality and the desired future character of the area.
Principle 3: Built Form	The buildings have been deigned to exhibit design excellence as discussed in **Section 5.2.2** of this report.
Principle 4: Density	As discussed in **Section 2.2 and Section 5.1** of this report, the proposed modifications will: • contribute to the long-term dwelling targets outlined in *a Plan for Growing Sydney* and the *Revised Draft Eastern City District Plan* • provide an indicative 40 – 60 affordable rental housing dwellings which will assist with the delivery of 10,500 new affordable rental dwellings required to achieve Council's 7.5 % affordable rental housing target as set out in Sustainable Sydney 2030 • continue to provide an appropriate dwelling mix to respond to local housing needs. The site is within an existing inner city suburb with excellent access to transport, services and facilities and is highly suitable for accommodating increased density to provide affordable housing. The Department therefore supports the increase in density on the basis of the significant contribution to affordable housing. In addition, the proposed modifications to the building height have been designed to respond to the requirements of the CMP and the character of the adjoining heritage conservation area.
Principle 5: Resource, Energy and Water Efficiency	A revised BASIX Certificate has been provided and demonstrates the proposed modifications are consistent with the relevant water and energy efficiency targets.
Principle 6: Landscape	The proposed modifications comply with the minimum communal open space and deep soil requirements of the ADG. In addition, the proposed revisions to the approved Landscape Strategy provide an appropriate response to the character of the site
Principle 7: Amenity	The proposed modifications generally comply with the requirements of SEPP 65 and the ADG in terms of achieving appropriate levels of amenity. All variations to the standards recommended in the ADG are discussed in detail in **Section 5.2.3** of this report. In summary, this assessment concludes the proposed development will achieve appropriate levels of solar access, natural ventilation and privacy.
Principle 8: Safety and Security	All buildings have been designed to provide passive and active surveillance of the public domain and communal open space. Further, all apartments have been provided with secure storage and private open space. Secure access is also provided to each building.
Principle 9: Social Dimensions and Housing Affordability	The proposed modifications to the applications will continue to provide a suitable mix of 1, 2 and 3 bedroom apartments and will provide 3,993 m^2 of affordable rental accommodation to provide accommodation for a range of households.
Principle 10: Aesthetics	The proposed revisions to the architectural plans improve the references to the Inter-War Functionalist design of the former Rachel Forster Hospital and provide a more sympathetic response to the scale and character of Albert Street in comparison to the approved project.

An assessment of the proposal against the ADG best practice design principles is provided in **Table 2** below:

Table 2: Compliance with the Design Standards Recommended in the ADG

Relevant Criteria	Design response	Consistency
Part 1: Identifying the Context		
Part 1B Local character and context		
Good design responds and contributes to its context. Context is everything that has a bearing on an area and comprises its key natural and built features. Context also includes social, economic and environmental factors.	• The subject site is a Heritage Item and is located within a local heritage conservation area. Subject to the conditions recommended in Section 5.2 of this report, the proposal is capable of being designed to respond to the heritage values of the site and the adjoining heritage conservation area. • In addition, the proposed modifications will provide publicly accessible open space and new affordable rental accommodation that responds to the site's inner-city location.	Yes
Part 3: Siting		
3A Site analysis		
Site analysis illustrates that design decisions have been based on opportunities and constraints of the site conditions and their relationship to the surrounding context.	The proposal is informed by an analysis of the impacts of the additional built form on the heritage values of the site and the adjoining heritage conservation area. In addition, the Proponent's site analysis considered the amenity impacts of the additional built form on buildings within and external to the site.	Yes
3B Orientation		
Building types and layouts respond to the streetscape and site while optimising solar access within the development.	• Buildings A, C and D are visible from the Pitt and Albert Street streetscapes. • Building D is directly accessible from Albert Street and Building C is orientated toward Pitt Street to provide passive surveillance of the public domain. • Buildings A and D also incorporate small scale retail uses to activate the publicly accessible open space proposed along the site's Pitt Street frontage. • The applications are generally consistent with the approved setbacks from Pitt and Albert Streets, however the applications seek approval to increase the height of Building C from 4 to 6 storeys and amend the approved façade designs for Buildings A, C and D. • The Department considers the proposed modification to the height of Building C responds to the character of the Pitt Street streetscape on the basis that it will not adversely impact on the heritage view corridor toward the site when travelling from the north along Pitt Street. • The application complies with the solar access provisions of the ADG.	Yes
Overshadowing of neighbouring properties is minimised during mid-winter.	• The proposal will result additional overshadowing of courtyards and roofs at 150 Pitt Street and 153 George Street.	Yes

	• Although the residential apartments at the adjoining sites will receive additional overshadowing, this only occurs before 11 am in mid-winter and is considered minor by the Department.	
3C Public domain interface		
Transition between private and public domain is achieved without compromising safety and security.	• Passive surveillance is available from balconies and windows which overlook the public domain and the communal open space. • The communal open space adjacent to Buildings A, C and D has been designed to provide opportunities for casual interaction between residents and the public domain. • Suitable landscape treatments are also proposed for the lower ground and ground floor apartments fronting Albert Street (Building D) to ensure an appropriate transition between the private and public domain.	Yes
Amenity of the public domain is retained and enhanced.	• The proposed modifications are generally consistent with the street setbacks identified in the Concept Plan and Project Approval. The Department has concluded these setbacks are sufficient to offset the two additional storeys proposed on Building C which are visible from the public domain. • The proposed modifications to Building D provide a more sympathetic response to the terrace forms immediately north and west of the site along Albert Street in comparison to the approved project. • The applications seek to retain the forecourt along the site's Pitt Street frontage, as per the existing approvals.	Yes
3D Communal and public open space		
An adequate area of communal open space is provided to enhance residential amenity and to provide opportunities for landscaping: • Communal open space has a minimum area equal to 25% of the site; and • Developments achieve a minimum of 50% direct sunlight to the principal usable part of the communal open space for a minimum of two hours between 9 am and 3 pm on 21 June (mid-winter).	• Ground level communal open space is provided, equivalent to 51.85 % (3,590 m^2) of the overall site area. • The site's principal open space is located along the Pitt Street frontage of the site. Direct sunlight will be provided to more than 50 % of this area between 9 am and 1 pm (4 hours) at the winter solstice.	Yes
Communal open space is designed to allow for a range of activities, respond to site conditions and be attractive and inviting.	• Communal open space has been designed for passive use, with seating proposed within the private and publicly accessible areas. • The communal open space incorporates a range of hard and soft landscape treatments and is well laid out to encourage use and maximise amenity.	Yes
Communal open space is designed to maximise safety.	• The landscape design, including the locations of the lifts and stairs, promote visibility across the space. • With the exception of the forecourt area along Pitt Street, communal open space is only accessible to residents.	Yes
Public open space, where provided, is responsive to the existing pattern and uses of the neighbourhood.	• No public open space will be provided on-site, however the landscaped	Yes

<table>
<tr><td></td><td>forecourt adjacent to Pitt Street is proposed to be publicly accessible.
• The publicly accessible open space has been designed to interpret the forecourt of the former Rachel Forster Hospital, as per the intent of the CMP.</td><td></td></tr>
<tr><td>3E Deep soil zones</td><td></td><td></td></tr>
<tr><td>Deep soil zones are to meet the following minimum requirements: 7% deep soil zone and a minimum dimension of 6 m.</td><td>13.1 % of the site has been nominated as a deep soil zone. This area exceeds the minimum 6 x 6 m dimensions.</td><td>Yes</td></tr>
<tr><td>3F Visual privacy</td><td></td><td></td></tr>
<tr><td>Separation distances from building to boundary:
<table><tr><th>Height</th><th>Habitable rooms</th><th>Non-habitable rooms</th></tr><tr><td>Up to 12 m (4 storeys)</td><td>12 m</td><td>6 m</td></tr><tr><td>Up to 25 m (5-8 storeys)</td><td>12 m</td><td>9 m</td></tr></table>
Separation distances between buildings on the same site should combine required building separations depending on the type of room.</td><td>• The Concept Plan and Project Approval permit separation distances below the ADG requirements. The approved separation distances are as follows:
▪ 5.5 m – 6.5 m between Buildings A and C;
▪ 6.5 m between Buildings A and B;
▪ 9 to 11 m between Buildings B and C
▪ 7 m between Buildings B and D
▪ 6.5 - 8.5 m between Buildings C and D
▪ 7 to 14.5 m between Building A and the adjoining residential flat building to the south
▪ 6.5 m between Building A and the adjoining residential flat building to the west.
• These setbacks were permitted on the basis that appropriate levels of privacy could be provided via the use of highlight/frosted windows, landscape planting and privacy screens.
• The proposed modifications generally increase the separation distances between the first four floors of Buildings A to D. However, whilst proposed separation distances remain below the standards outlined in the ADG, the applications continue to provide suitable mitigation measures to manage visual and acoustic privacy. As such the proposed variations to the separation distances between the first four levels of Buildings A to D are supported.
• Similarly, the applications propose variations to the separation distances for levels 5 and above, as recommended in the ADG. As the applications propose suitable mitigation measures to provide visual and acoustic privacy between Buildings A and B, A and C and B and C, the Department has concluded the proposed variations to the ADG standards should be supported.
• These issues are discussed in greater detail in **Section 5.2.3** of this report.</td><td>Is consistent with aims of ADG, refer to **Section 5.2.3**.</td></tr>
<tr><td>Site and building design elements increase privacy without compromising access to light and air and balance outlook and views from habitable rooms and private open space.</td><td>• Direct overlooking between buildings within and adjacent to the site is mitigated through the orientation of the</td><td>Yes</td></tr>
</table>

	apartments and the inclusion of highlight and screened windows. • The proposed rooftop terraces have been designed to incorporate screen planting to manage visual privacy. • Notwithstanding, the Department has recommended new conditions of Project Approval to: ▪ require the Proponent to design and install a transparent acoustic wall with associated landscaping on the northern elevation of Building D and the western elevation of Building B, to the satisfaction of the Secretary to manage potential noise impacts at existing residences ▪ prohibit the installation of lighting on the outdoor terraces to manage potential noise impacts within the site during the evening.	
3G Pedestrian access and entries		
Building entries and pedestrian access connects to and addresses the public domain	• Pedestrian entrances to Buildings A, B and C are located either side of the publicly accessible forecourt along Pitt Street. Pedestrian access to Building D is available via the Pitt Street forecourt, or via one of three building entrances along Albert Street. • All building entrances connect to and address the public domain.	Yes
Access, entries and pathways are accessible and easy to identify.	• Universal access to Buildings A to D is provided via a series of ramps and lifts along the Pitt Street frontage of the site. The accessible entries are readily identifiable from the public domain. • Pedestrian access to Building D is also available via Albert Street. • A wayfinding strategy has also been provided to ensure each building entrance is readily identifiable within the internal areas of the development.	Yes
Large sites provide pedestrian links for access to streets and connection to destinations.	• No through-link is required.	N/A
3H Vehicle access		
Vehicle access points are to be designed and located to achieve safety, minimise conflicts between pedestrians and vehicles and create high quality streetscapes.	• Vehicle access will be retained on Pitt Street away from pedestrian access points to minimise potential vehicle and pedestrian conflicts and create a high quality streetscape, as per the requirements of the existing approvals.	Yes
3J Bicycle and car parking		
Car parking is provided based on proximity to public transport in metropolitan Sydney and centres in regional areas. Apply the minimum car parking requirement in RMS' *A Guide to Traffic Generating Developments* or the relevant local standards, whichever is less.	• The Sydney LEP is used as a guide, given it has a lower parking requirement than the RMS' *A Guide to Traffic Generating Developments.* • The application proposes the creation of 160 car parking spaces, consistent with the car parking maxima outlined in the Sydney LEP.	Yes.
Parking and facilities are provided for other modes of transport.	• A total of 245 bicycle parking spaces and 11 motorcycle spaces are proposed for residents and visitors within the basement car park, consistent with the rates identified in the Sydney LEP 2012.	Yes

Car park design and access is safe and secure.	• The car park will have a secure entry. In addition, the car park has been set out to maximise sight lines and minimise spaces for concealment.	Yes
Visual and environmental impacts of underground car parking are minimised.	• The proposed car park layout is well designed, with a logical and efficient structural grid. • The car park does not protrude above existing ground level.	Yes
Visual and environmental impacts of on-grade car parking are minimised.	• At-grade car parking is not proposed.	Yes
Visual and environmental impacts of above ground enclosed car parking are minimised. Positive street address and active frontages should be provided at ground level.	• All car parking is proposed within the basement. • Access to the driveway is located at the south-east corner of the site along Pitt Street to maximise activation along the main site frontage and provide safe pedestrian access and movement along Pitt and Albert streets.	Yes
Part 4: Building		
4A: Solar and daylight access		
To optimise the number of apartments receiving sunlight to habitable rooms, primary windows and private open space: • At least 70% of apartment living rooms and private open spaces receive a minimum of 2 hours direct sunlight between 9 am and 3 pm in mid-winter • a maximum of 15% of apartments receive no direct sunlight between 9 am and 3 pm in mid-winter.	• 151 apartments (71 %) achieve a minimum of 2 hours of direct sunlight between 9 am and 3 pm in mid-winter. • 28 apartments (13.2 %) receive no direct sunlight between 9 am and 3 pm at mid-winter.	Yes
Daylight access is maximised where sunlight is limited.	• The applications incorporate the use of slots and skylights to maximise sunlight to south facing apartments.	Yes
Design incorporates shading and glare control, particularly for warmer months.	• The eastern and western elevations of Buildings B and C incorporate shading devices to manage glare and provide thermal comfort. The northern elevations of Buildings A and D have also been designed to incorporate suitable shading devices. • Cladding materials with a maximum visible light reflectivity of 20 % are incorporated to decrease glare.	Yes
4B Natural ventilation		
All habitable rooms are naturally ventilated.	• All habitable rooms are naturally ventilated.	Yes
The layout and design of single aspect apartments maximises natural ventilation.	• Single aspect apartments have been designed to maximise natural ventilation.	Yes
The number of apartments with natural cross ventilation is maximised to create a comfortable indoor environment for residents: • at least 60% of apartments are naturally cross ventilated in the first nine storeys (apartments 10 storeys or greater are deemed to be cross ventilated) • overall depth of a cross-over or cross-through apartment does not exceed 18 m, measured from glass to glass.	• Subject to the conditions outlined in **Section 5.2.3** of this report, the applications are capable of achieving compliance with the cross-ventilation requirements of the ADG. • Apartment depths do not exceed 18 m (17 m proposed) when measured from glazing line to glazing line.	Capable of compliance, see **Section 5.2.3**.

<table>
<tr><td>4C Ceiling heights</td><td></td><td></td></tr>
<tr><td>Ceiling height achieves sufficient natural ventilation and daylight access.</td><td>• All apartments have a floor to floor height of 3.1 m to ensure a minimum ceiling height of 2.7 m can be achieved.</td><td>Yes</td></tr>
<tr><td>Ceiling height increases the sense of space in apartments and provides for well-proportioned rooms.
Ceiling heights contribute to the flexibility of building use over the life of the building.</td><td>• The hierarchy of internal spaces is emphasised through higher ceilings to habitable rooms and lower ceilings (e.g. bulkheads) to non-habitable rooms.</td><td>Yes</td></tr>
<tr><td>4D Apartment size and layout</td><td></td><td></td></tr>
<tr><td>The layout of rooms within an apartment is functional, well organised and provides a high standard of amenity.
• studio apartments are required to have a minimum internal area 35 m^2
• one-bedroom apartments are required to have a minimum internal area of 50 m^2
• two-bedroom apartments are required to have a minimum internal area of 70 m^2
• three-bedroom apartments are required to have a minimum internal area of 90 m^2
• every habitable room must have a window in an external wall with a total glass area of not less than 10% of the floor area. Daylight and air may not be borrowed from other rooms.</td><td>• All apartments comply with the minimum internal areas.
• Habitable rooms have a window on an external wall or a door / window onto the balcony and windows achieve the 10% requirement.</td><td>Yes</td></tr>
<tr><td>Environmental performance of the apartment is maximised:
• Habitable room depths are limited to a maximum of 2.5 x the ceiling height (6.75 m).
• In open plan layouts the maximum habitable room depth is 8 m from a window.</td><td>• The applications comply with the room to ceiling depth ratios, and open plan layouts have a maximum room depth of 8 m from a window.</td><td>Yes</td></tr>
<tr><td>Apartment layouts are designed to accommodate a variety of household activities and needs:
• Master bedrooms have a minimum area of 10 m^2 and other bedrooms have 9 m^2 (excluding wardrobe space).
• Bedrooms have a minimum dimension of 3 m (excluding wardrobe space).
• Living rooms or combined living / dining rooms have a minimum width of 3.6 m for studio and one bed apartments and 4 m for two and three bed apartments.
• The width of cross-over or cross-through apartments are at least 4 m internally to avoid deep narrow apartment layouts.</td><td>• Master bedrooms have a minimum area of 10 m^2, with all other bedrooms achieving a minimum area of 9 m^2.
• Bedrooms have minimum dimensions of 3 m.
• Living areas widths and the widths of cross-through apartments satisfy the design criteria in all apartments.</td><td>Yes</td></tr>
<tr><td>4E Private open space and balconies</td><td></td><td></td></tr>
<tr><td>Apartments provide appropriately sized principal private open space and balconies to enhance residential amenity:

<table><tr><th>Dwelling type</th><th>Minimum area</th><th>Minimum depth</th></tr><tr><td>Studio</td><td>4 m^2</td><td>-</td></tr><tr><td>1 bedroom</td><td>8 m^2</td><td>2 m</td></tr><tr><td>2 bedroom</td><td>10 m^2</td><td>2 m</td></tr><tr><td>3+ bedroom</td><td>12 m^2</td><td>2.4 m</td></tr></table>
Minimum depth to count towards area is 1 m.</td><td>• All apartments provide open space in the form of balconies or private gardens.
• All balconies meet the minimum recommendations for depth and area.
• 36 of 38 of the ground level apartments (94 %) do not achieve the minimum private open space requirements (15 m^2 required, between 5.2 m^2 and 19.3 m^2 m proposed).
• The proposed variations to the minimum private open space requirements for the ground level apartments are considered acceptable on the basis the applications</td><td>No, see Section 5.2.3 of this report</td></tr>
</table>

<table>
<tr><td>Private open space on the ground level has a minimum area of 15 m^2 and a minimum depth of 3 m.</td><td>exceed the minimum communal open space requirement (1,730 m^2 required, 3,590 m^2 proposed), and 64 upper level apartments (46 %) exceed the minimum private open space requirements.</td><td></td></tr>
<tr><td>Primary private open space and balconies are appropriately located to enhance liveability for residents.</td><td>• Primary private open space areas are located adjacent to the living space in all apartments.</td><td>Yes</td></tr>
<tr><td>Private open space and balcony design is integrated into and contributes to the overall architectural form and detail of the building.</td><td>• Balconies have been integrated into the overall architectural form and detail of the building.</td><td>Yes</td></tr>
<tr><td>Private open space and balcony design maximises safety.</td><td>• Balconies are oriented to maximise surveillance of the communal open space and the Pitt and Albert Street streetscapes.
• Communal open space has been designed in accordance with crime prevention through environmental design (CPTED) principles.</td><td>Yes</td></tr>
<tr><td>4F Common circulation and spaces</td><td></td><td></td></tr>
<tr><td>Common circulation spaces achieve good amenity and properly service the number of apartments:
• Maximum number of apartments off a circulation core is eight (or no more than 12 apartments).

Common circulation spaces promote safety and provide for social interaction between residents.</td><td>• The maximum number of apartments off a circulation core is 7.
• Corridors will receive natural light and ventilation.</td><td>Yes</td></tr>
<tr><td>4G Storage</td><td></td><td></td></tr>
<tr><td>Adequate, well designed storage is provided in each apartment. In addition to storage in kitchens, bathrooms and bedrooms, the following storage is provided:

<table><tr><th>Dwelling type</th><th>Storage size volume</th></tr><tr><td>Studio</td><td>4 m^3</td></tr><tr><td>1 bedroom</td><td>6 m^3</td></tr><tr><td>2 bedroom</td><td>8 m^3</td></tr><tr><td>3+ bedroom</td><td>10 m^3</td></tr></table>
With at least 50% located within the apartment.
Additional storage is conveniently located, accessible and nominated for individual apartments.</td><td>• Residential storage is located within the apartments and the basement and is provided in accordance with the minimum rates specified in the ADG (a minimum of 50 % of the required storage volume is provided within the apartments).</td><td>Yes</td></tr>
<tr><td>4H Acoustic privacy</td><td></td><td></td></tr>
<tr><td>Noise transfer is minimised through the siting of buildings and building layout

Noise impacts are mitigated within apartments through layout and acoustic treatments.</td><td>• The Department has recommended conditions of approval to:
▪ preclude the installation of lighting of the roof top terraces to minimise</td><td>Yes</td></tr>
</table>

	opportunities for late night use ▪ require the installation of a transparent acoustic screen along the northern elevation of Building D and the western elevation of Building B to manage potential noise impacts associated with the outdoor terraces. • Subject to these conditions, the Department is satisfied the noise impacts associated with the operation of the roof top terraces can be managed.	
4K Apartment mix		
A range of apartment types and sizes is provided to cater for different household types now and into the future. The apartment mix is distributed to suitable locations within the building.	• A variety of apartment sizes and types suitable for the housing needs of the area are accommodated and appropriately located within the building • Each building is provided with a suitable mix of studio, 1, 2 and 3 bedroom apartments.	Yes
4L Ground floor apartments		
Street frontage activity is maximised where ground floor apartments are located. Design of ground floor apartments delivers amenity and safety for residents.	• Active spaces are provided adjacent to the ground floor apartments proposed in Buildings A to D. • The orientation of the buildings allows for surveillance of the public domain and communal open space.	Yes
4M Facades		
Building facades provide visual interest along the street while respecting the character of the local area.	• The design provides visual interest on the street level and respects the heritage significance of the former Rachel Forster Hospital and the character of the adjoining heritage conservation area. The design of the façade is discussed in further detail in **Sections 5.2.1** and **5.2.2** of this report.	Yes
Building functions are expressed by the façade.	• The retail and residential components are externally expressed in the design of the building	Yes
4N Roof design		
Roof treatments are integrated into the building design and positively respond to the street.	• The roof treatments are defined by the landscaped roof gardens. The gardens for Buildings B and D are not visible from street level.	Yes
4O Landscape design		
Landscape design is viable and sustainable. Landscape design contributes to the streetscape and amenity.	• Landscaping includes a mixture of native and exotic plants that require little water and will survive in the exposed conditions of the roof garden. • Planting and furniture is provided within the rooftop garden.	Yes

	• The landscaped forecourt along the Pitt Street frontage of the site has been designed to interpret the historic plantings associated with the former Rachel Forster Hospital and respond to the character of the Pitt Street streetscape.	
4P Planting on structures		
Appropriate soil profiles are provided. Plant growth is optimised with appropriate selection and maintenance. Planting on structures contributes to the quality and amenity of communal and public open spaces.	• Suitable soil depths are proposed to accommodate the plant species identified in the landscape plan. • Plants have been selected to provide a suitable level of screening and shading and minimise the need for maintenance. • Appropriate rooftop planting is proposed.	Yes
4Q Universal design		
Universal design features are included in apartment design to promote flexible housing for all community members (Developments achieve a benchmark of 20% of the total apartments incorporating the Liveable Housing Guidelines silver level universal design features). A variety of apartments with adaptable designs are provided. Apartment layouts are flexible and accommodate a range of lifestyle needs.	• 45 apartments (21%) achieve a silver level performance rating (Liveable Housing Guidelines, Liveable Housing Australia) • 34 (15%) of apartments are adaptable, which complies with the Sydney DCP 2012.	Yes
4S Mixed use		
Mixed use developments are provided in appropriate locations and provide active street frontages that encourage pedestrian movement.	• The development addresses the street and active frontages are provided. • Small scale neighbourhood shops are proposed at ground level to activate the publicly accessible forecourt located along the site's Pitt Street frontage.	Yes
Residential levels of the building are integrated within the development, and safety and amenity is maximised for residents.	• Residential circulation areas are clearly defined and access to communal open space is provided.	Yes
4T Awning and signage		
Signage should be integrated with an awning or street wall without obscuring or dominating important views.	• The Department has recommended a new condition of Concept Approval to ensure future building signage is integrated with the design of the buildings.	Yes
4U Energy efficiency		

Development incorporates passive environmental design. Development incorporates passive solar design to optimise heat storage in winter and reduce heat transfer in summer. Adequate natural ventilation minimises the need for mechanical ventilation.	• The development meets the BASIX water, thermal and energy efficiency targets. • The buildings have been orientated to maximise solar access and achieve natural ventilation, where possible.	Yes
4V Water management and conservation		
Potable water use is minimised. Urban stormwater is treated on site before being discharged to receiving waters. Flood management systems are integrated into site design.	• Water efficient fittings and appliances will be installed. • The applications incorporate water sensitive design initiatives such as rainwater storage and re-use, and native planting.	Yes
4W Waste management		
Waste storage facilities are designed to minimise impacts on the streetscape, building entry and amenity of residents. Domestic waste is minimised by providing safe and convenient source separation and recycling.	• Waste chutes and storage rooms are located on each level with waste storage provided in the basement. • Waste requires transport from the basement to the bin storage area adjacent to the eastern elevation of Building A, with collection to occur via a loading bay on Pitt Street. • The double handling of waste and waste collection via the street is not supported. The Department has recommended conditions of approval requiring the redesign of the basement area to ensure waste collection can occur within the basement car park.	Yes/Compliant subject to conditions
4X Building maintenance		
Building design detail provides protection from weathering. Systems and access enable ease of maintenance. Material selection reduces ongoing maintenance costs.	• Building entrances and balconies have been designed to provide weather protection. • With the exception of the lifts within the communal open space areas, manually operable systems have been selected to reduce maintenance costs. • The materials selected are low maintenance, recyclable and have a long life-cycle.	Yes

Planning Circular 'Using the Apartment Design Guide'
On 29 June 2017, the Planning Circular '*Using the Apartment Design Guide*' was issued by the Secretary. The Circular emphasised the ADG is not intended to be applied as a set of strict development standards and where it is not possible to satisfy the design criteria, the consent authority is to consider how, through good design, the objective can be achieved.

The Circular supports the Department's approach to assessing the residential amenity of the proposed building in that all proposed units are not reasonably required to achieve every amenity design criteria in the ADG and that this is not the intention of the ADG. As demonstrated in the analysis above and in **Section 5.2.3**, the Department considers all unit types will achieve an acceptable level of amenity and concludes the proposed building satisfies the intent of the ADG.

APPENDIX D: COMPLIANCE WITH THE CMP FOR THE FORMER RACHEL FORSTER HOSPITAL

CMP Principle/Policy	Department Comment	Compliance
Principle A – Recognise and retain heritage values		
The assessment of significance contained in this CMP provides the basis for the future management of the site and its setting. It recognises the history of a site where significance lies partially in built elements, and their relationships with each other, but primarily in use, association and meaning.	The proposed modifications, as amended by the recommended conditions of approval, provide an appropriate response to the significance of the northern and eastern elevations of Buildings A and C and the landscape forecourt as well as their historic relationships with each other.	Yes
Principle L – Maintain the setting		
Two aspects of setting need to be considered: • the setting in which the site is located • the setting within the site. New work should enhance or, at the very least, not diminish or mask significance.	The Department notes the CMP concludes the understanding of the hospital as a large-scale complex in the context of the surrounding area has been diminished by the construction of the high rise residential flat buildings beyond the site to the south and south west, and the construction of three to six storey residential flat buildings immediately south of the site. Further, the Department notes the built form controls outlined in the SSP SEPP recognise context of the site in its immediate surroundings, as well as the spatial relationships of the buildings within the site. Based on these relationships, a height limit of 6 storeys has been applied to the portion of the site to the south of Building D, and a height limit of 3 storeys has been applied to the section of the site that housed the former outpatients block. The proposal complies with the height limits identified in the SSP SEPP and has been designed to preserve views to the northern elevation of Building A from the Pitt Street view corridor, and retain the spatial relationship between Buildings A, C and the landscape forecourt. Given the above, the Department is satisfied the proposal would maintain the setting of the former hospital.	Yes
Policy A – Retain identified heritage values and avoid adverse heritage impacts		
Respond to the significance of the place, including its significant relationships with the surrounding area and people	The conditions of the Concept Plan and Project Approval require the preparation and implementation of a Heritage Interpretation Plan to identify the significance of the place and its relationship with the surrounding area and people. The applications do not seek approval to alter these conditions.	Yes
Recognise the contribution of all phases of the site's history to its significance	The Interpretation Plan must be prepared in accordance with the requirements of the CMP and will need	Yes

	to recognise the contribution of all phases of the site's history.	
Have regard to relative significance as determined in Section 5.5	The CMP concludes the northern and eastern elevations of Building A, and the eastern elevation of Building C have exceptional significance (Category A) and form part of the iconic views of the site from the northern view corridor along Pitt Street. These views are categorised as iconic as they have been used to identify the hospital since its completion in 1941. The CMP concludes the remaining elevations of Buildings A and C are of moderate significance (Category C). In addition, the CMP concludes the northern and eastern elevations of Building D have a high to moderate significance (B/C), with the remaining buildings and elevations on site having moderate to neutral significance (C to D). Whilst the primary significance of the Former Rachel Forster Hospital Site is historic, social and associative, the Concept Plan and Project Approval require the full retention of the eastern elevation of Building A and the colonnade to retain the spatial relationship between the former hospital buildings and the landscaped forecourt, and enable an appreciation of these elements from the historic view corridor within Pitt Street. It is important to note that whilst the CMP identifies the northern elevation of Building A as being of exceptional significance, the Concept Plan and Project Approval permit the demolition of the northern and southern elevations, as well as non-significant fabric on the eastern elevation of this building. In addition, with the exception of the colonnade, the Concept Plan and Project Approval permit the demolition of the remaining buildings on-site. The applications seek approval to increase the height of Buildings B and C, modify the facades of the northern and eastern elevations of Building A, demolish the section of the colonnade between Building A and C and C and D, and reconstruct the portion of the colonnade abutting Building C. The Department has assessed the proposed modifications to the building heights and façade designs and has concluded:	Yes, subject to conditions

	• the proposed modifications to the northern elevation of Building A provide a sympathetic interpretation of the Inter-War Functionalist style of the former surgery building. • the proposed modifications to the eastern elevation of Building A retain the majority of the significant fabric. However, modifications are proposed to the windows on levels 2 and 4 of the building. These modifications are unsympathetic to the existing building fabric (powder coated aluminium frames) and are not supported. The Department has recommended a new condition in the Project Approval to ensure the design of these windows will be sympathetic to the existing building fabric • the incorporation of face brick and simple vertically proportioned fenestration on levels 1 and 2 of the eastern elevation of Building C provides a sympathetic interpretation of the architecture of the former administration block, particularly when compared to the architectural design of the approved project. In addition, the introduction of upper level setbacks along the southern and eastern elevations of Building C will ensure the additional building height will be read as a new architectural element from the public domain in Pitt Street • the demolition and partial reconstruction of the colonnade is not supported. This issue is discussed in greater detail in **Section 5.2.2**.	
Policy E – Maintain and understanding of the form and scale of Buildings A and C and the relationships between them		
Maintain appropriate setbacks to Pitt and Albert Streets	The primary setbacks to Pitt Street (nil setback from Building A and 24 m from Building C) are maintained. Minor changes are proposed to the building setback along Albert Street. These setbacks are generally consistent with the Concept and Project approvals. In particular, the setback from Albert Street aligns with the face wall of the terrace adjacent to the eastern boundary of the site.	Yes

Retain the eastern and northern elevations of Building A and the colonnade to Building C, including the form of the intersection between the Buildings A and C	As outlined above, the demolition of the northern elevation of Building A was permitted under the Concept and Project approvals. The applications seek approval to delete Condition B1 of the Project Approval to permit the demolition of the portion of the colonnade between Buildings A and C and Buildings C and D. The Department notes the colonnade has been demolished in full and this matter is the subject of an on-going compliance investigation. The Department considers the partial reconstruction of the colonnade is inconsistent with the recommendations of the CMP. This issue is discussed in greater detail in **Section 5.2.1**.	Yes
Retain an understanding of the scale of the eastern elevation of Building A in relation to Pitt Street	The proposed design incorporates architectural treatments to differentiate the old and new building fabric. Notwithstanding, to provide an understanding of the height of the former surgery building the Department has recommended a condition of approval requiring the proposal to be redesigned to ensure the new level (level 5) is not read as an original building element from significant vantage points in the Pitt Street view corridor.	Yes, subject to conditions
The courtyard and circular entrance to the front of the Hospital support the view corridor to the colonnade and the northern elevation of Building A	The courtyard remains in its original location along Pitt Street. Paving and plantings have been provided to interpret the form and function of the original courtyard.	Yes
Policy L – An appropriate setting for the site should be maintained		
Opportunities for landscaping exist in the front of the buildings and in the two rear courtyards. Information found to date indicates the landscaping of the front of the building was of importance to the Hospital in terms of its presentation to the street and as a place where patients, staff and visitors could relax	As outlined above, the courtyard remains in its original location along Pitt Street and paving and plantings have been provided to interpret the form and function of the original courtyard.	Yes
All future landscaping works should respect the significance of the site. Works should not compete with or be incompatible in character with significant elements or the site as a whole.	The proposed landscape works incorporate large plantings along the Pitt Street frontage to respond to the significance of the site and maintain the historic relationships between Buildings A, C and the landscaped courtyard. The remaining landscape treatments will not complete, or be incompatible with, the building fabric proposed for retention/reconstruction on the eastern elevations of Buildings A and C.	Yes
Landscaping should take into consideration issues such as: • historic layout and view corridors, particularly the view towards the intersection of Buildings A and C	The proposed revisions to the landscape strategy seek to maintain an understanding of the original form of the landscape forecourt and its relationship with the former hospital buildings.	Yes

• the requirements of the users of the site • interpretative opportunities • the proper separation of garden beds from walls • ground levels relative to walls • the appropriateness of ground surfaces.	In addition, the revised strategy will provide opportunities for passive recreation for building occupants, and will remain publicly accessible as per the intent of the Concept Approval.	
Policy L – The use of significant elements, spaces and areas should be consistent with their level of relative significance and their assessed heritage values		
When considering changes to elements identified as being of 'Exceptional or High Significance': • consider all available options to determine the best course of action • avoid work with an adverse heritage impact • consider the reinstatement of historic use, spaces etc where appropriate • facilitate the interpretation of the history of the site, its context, its use and/or individual buildings • carefully consider the cumulative impact of a series of minor changes • ensure that an appropriate setting is retained, including significant views • commission a Heritage Impact Statement prepared by a qualified heritage consultant.	As outlined above, the current approvals permit the demolition of the northern elevation of Building A, as well as the full demolition of the remaining buildings on-site. Notwithstanding, the existing approvals require the retention of the colonnade structure connecting former Buildings A, C and D. The Department has recommended conditions of approval to ensure the significant sections of the colonnade are reconstructed, and the architectural treatments proposed on the eastern elevation of Building A are sympathetic to the original building fabric.	Yes, subject to conditions
Changes to other elements that will have an impact on elements ranked A and B in Section 5.6 should be subject to a similar process	The applications seek approval to introduce new window frames on the eastern elevation of Building A and reconstruct the former colonnade structure along the eastern elevation of Building C. Subject to the conditions outlined above, the proposed modifications will not result in any adverse impacts to this fabric.	Yes
Uses that would introduce irreversible modifications to significant elements and have an adverse impact on significance are not acceptable	Subject to the removal of the waste storage room adjacent to the eastern elevation of Building A, the proposed modifications will not result in the introduction of new uses that will cause irreversible changes to significant fabric associated with Building A.	Yes
Record the changes made.	With the exception of Building A, the buildings associated with the former Rachel Forster Hospital have been demolished. Archival recording of the buildings was undertaken prior to demolition as per the requirements of Condition B12 of the Project Approval.	Yes