



**MODIFICATION REQUEST TO CONCEPT APPROVAL
AND PROJECT APPROVAL:**

**Former Rachel Forster Hospital (134-144 Pitt Street,
Redfern)**

MP 07_0029 MOD 1 and MP 09_0068 MOD 1



Secretary's Environmental Assessment Report
Section 75W of the *Environmental Planning and
Assessment Act 1979*

March 2018

ABBREVIATIONS

CIV	Capital Investment Value
Concept Plan	Approved Concept Plan for the redevelopment of the site (MP 07_0029)
Council	City of Sydney Council
Commission	Planning Assessment Commission
Department	Department of Planning and Environment
EA	Environmental Assessment
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPI	Environmental Planning Instrument
FSR	Floor Space Ratio
GFA	Gross Floor Area
LEP	Local Environmental Plan
LGA	Local Government Area
Minister	Minister for Planning
OEH	Office of Environment and Heritage
Part 3A	Part 3A of the <i>Environmental Planning and Assessment Act 1979</i>
Project Approval	Approved Project for redevelopment of the site (MP 09_0068)
Proponent	Kaymet Pty Ltd
RtS	Response to Submissions
SEARs	Secretary's Environmental Assessment Requirements
Secretary	Secretary of the Department of Planning and Environment
SEPP	State Environmental Planning Policy
TfNSW	Transport for NSW

Cover Photograph: Forecourt to Buildings A & C (Source: Applicant's RtS)

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EXECUTIVE SUMMARY

Kaymet Corporation (the Proponent) has lodged two concurrent section 75W applications to modify the Concept Plan (MP 07_0029 MOD 1) and Project Approval (MP 09_0068 MOD 1) for the redevelopment of the former Rachel Forster Hospital, in Redfern in the Sydney local government area. The Proponent seeks to introduce affordable rental housing within the development by increasing the height of two of the four buildings on site and increasing the overall density of the development. In particular, the proposals seek approval to:

- modify the Concept Plan to increase the height of Buildings B and C from four to six storeys, increase the maximum floor space ratio (FSR) from 2.0:1 to 2.252:1, and permit neighbourhood shop uses on the site
- modify the Project Approval to increase the height of Buildings B and C, reconfigure the internal layouts and external facades of Buildings A, B, C and D, increase the number of apartments from 158 to 213, increase the number of parking spaces from 138 to 160, introduce 3,993 m² of affordable rental housing floor space and provide two neighbourhood shops on the ground floor of Buildings A and D fronting Pitt Street.

The Department exhibited the applications between 19 January 2017 and 6 March 2017 (47 days) and received 47 submissions, comprising six submissions from public authorities, and 41 public submissions, including 39 objections.

The City of Sydney Council (Council) objects to the applications primary on the grounds of height, density, heritage impacts, residential amenity, the introduction of retail uses on site, and the traffic and transport impacts of the proposal. The key issues raised in public submissions include the impacts of the additional height and density, heritage impacts, proposed non-residential uses, amenity, traffic and car parking impacts, and existing construction management issues.

The Department has considered the issues raised by Council and the community in its assessment.

The Department supports the introduction of affordable rental housing on the site and notes that while State Environmental Planning Policy (Affordable Rental Housing) 2009 does not apply as the site contains a heritage item, the proposal provides an excellent opportunity to deliver a significant amount of affordable housing with good access to public transport, community facilities and services. The Department is satisfied the increase in height and floor space to accommodate the affordable housing will not adversely impact on the heritage values of the site, subject to conditions as outlined in this report.

The increase in height of Buildings B and C aligns with the maximum height permitted under the State Environmental Planning Policy (State Significant Precincts) 2005 and is considered compatible with the desired future character of the area. The Department is satisfied the building height and form maintains an appropriate relationship with other buildings on the site, and will continue to provide an acceptable level of amenity to neighbouring properties and within the site.

The Department has recommended a number of conditions to preserve key heritage features, including minor design changes to Building A and the reinstatement of the colonnade fronting Pitt Street in its entirety. Subject to these amendments, the Department is satisfied the proposal is consistent with the Conservation Management Plan for the site.

The Department supports the proposed non-residential uses which are limited to two small scale neighbourhood shops which will serve the local community without adverse impacts on residential amenity. The Department also supports the proposed car parking provision, which is consistent with the Sydney Local Environmental Plan 2012 and Sydney Development Control Plan 2012 and is unlikely to cause adverse traffic or on-street parking impacts in the locality.

The Department concludes the impacts of the applications can be mitigated and/or managed to ensure an acceptable level of environmental performance, subject to the recommended conditions of approval.

The proposal is consistent with directions and actions in the Greater Sydney Region Plan and the Eastern City District Plan and is justifiable on the grounds of the substantial contribution it will make to the affordable rental housing stock in Redfern. The Department therefore concludes the applications are in the public interest and are approvable, subject to conditions.

1. BACKGROUND

This report provides an assessment of two concurrent section 75W applications to modify the Concept Approval (MP 07_0029 MOD 1) and Project Approval (MP 09_0068 MOD 1) for the redevelopment of the former Rachel Forster Hospital site, Redfern.

The proposals seek approval to:

- modify the Concept Approval to increase the height of Buildings B and C from four to six storeys, increase the maximum floor space ratio (FSR) from 2.0:1 to 2.31:1, and introduce neighbourhood shops and food and drink premises
- modify the Project Approval to introduce 3,993 m² of affordable rental housing floor space, increase the height of Buildings B and C, reconfigure the internal layouts and external facades of Buildings A to D, increase the number of apartments from 158 to 213, increase the number of parking spaces from 138 to 160 and provide two neighbourhood shops on the ground floor of Buildings A and D fronting Pitt Street.

1.1 Site location and context

The site is located at 134-144 Pitt Street, Redfern on the corner of Pitt and Albert Streets approximately two kilometres south of the Sydney CBD. The site has an area of 6,922.9 m² and is within the City of Sydney Local Government Area (LGA) (Figures 1 and 2).

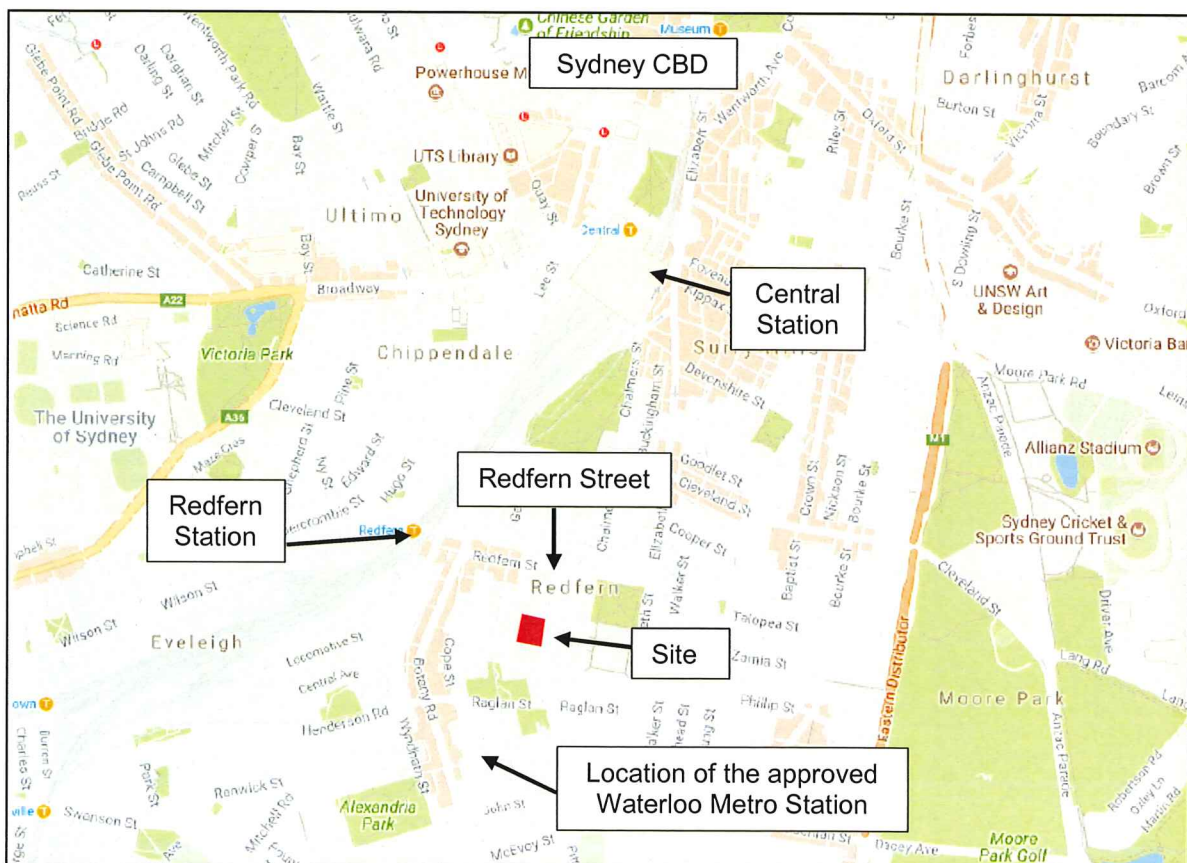


Figure 1: The Concept Approval site location and surrounding context (Base source: Nearmap)

The site formerly housed the Rachel Forster Hospital which operated between 1941 and 2000. The hospital comprised five buildings, which were constructed between 1940 and 1978. Building 1, the main five storey building, remains on site. All other buildings were demolished between 2010 and 2014 (Figure 3 and 4).



Figure 2: Aerial photo of the site and surrounding locality (site outlined in red) (Base source: Nearmap)

The site is located in an established inner-suburban / city fringe location. The surrounding development is predominantly residential and includes two storey terrace houses to the north and east, and contemporary two to six storey townhouses and residential flat buildings to the west and south. The wider locality features residential towers in the Waterloo Estate, commercial and retail development along Redfern and Regent Streets, and contemporary residential/commercial towers on Regent and Gibbons Streets.



Figure 3: Building A – retained hospital building



Figure 4: Existing partially excavated subject site with retained Building A to the left.

1.2 Approval history

On 9 October 2007, the then Minister for Planning approved a Concept Plan (MP 07_0029) for the redevelopment of the site for a mix of residential and public open space uses. Key aspects of the Concept Approval (**Figure 5** and **6**) include:

- 13,846 m² gross floor area (equating to a FSR of 2:1)
- maximum building heights (from 3 to 6/7 storeys) and envelopes for each of the four residential development blocks (Buildings A - D)
- retention and adaptive reuse of the existing heritage building and colonnade on the site
- public domain and landscape concept, including communal open space, public open space and pedestrian connections.

On 1 July 2013, the then Planning Assessment Commission granted Project Approval (**Figure 7**) for:

- demolition of Buildings B, C and D and tree removal
- adaptive reuse of the former surgery building (Building A) for residential housing and construction of three residential buildings comprising a total of 158 residential apartments
- two levels of basement car parking for 138 car spaces
- provision of publicly accessible communal open space
- strata subdivision.

2. PROPOSAL

2.1 Description of the proposals

The proposals seek to amend the Concept and Project Approvals to increase the residential floor space provided on site, principally to accommodate affordable rental housing in the development. The approved building footprints are retained, with two storey additions proposed to Buildings B and C to accommodate the increase in floor space.

In particular, the proposals seek to:

- modify the Concept Approval to increase the height of Buildings B and C from four to six storeys, increase the maximum floor space ratio (FSR) from 2.0:1 to 2.252:1, and permit neighbourhood shop uses on the site
- modify the Project Approval to:
 - introduce 3,993 m² of affordable rental housing floor space
 - increase the total maximum gross floor area by 1,746 m² from 13,846 m² to 15,592 m² (13%)
 - increase of 55 apartments from 158 to 213
 - increase the height of Buildings B and C by two storeys (from four to six storeys)
 - reconfigure the internal layouts and external facades of Buildings A, B, C and D
 - introduce neighbourhood shops on the ground floor of Buildings A and D
 - increase of 22 parking spaces from 138 to 160.

The key components and features of the proposals (as amended by the Proponent's Response to Submissions outlined in **Section 4.2**) are summarised at **Table 1** and shown in **Figure 8**. **Appendix A** contains a link to the Proponent's modification request documents and the RtS.

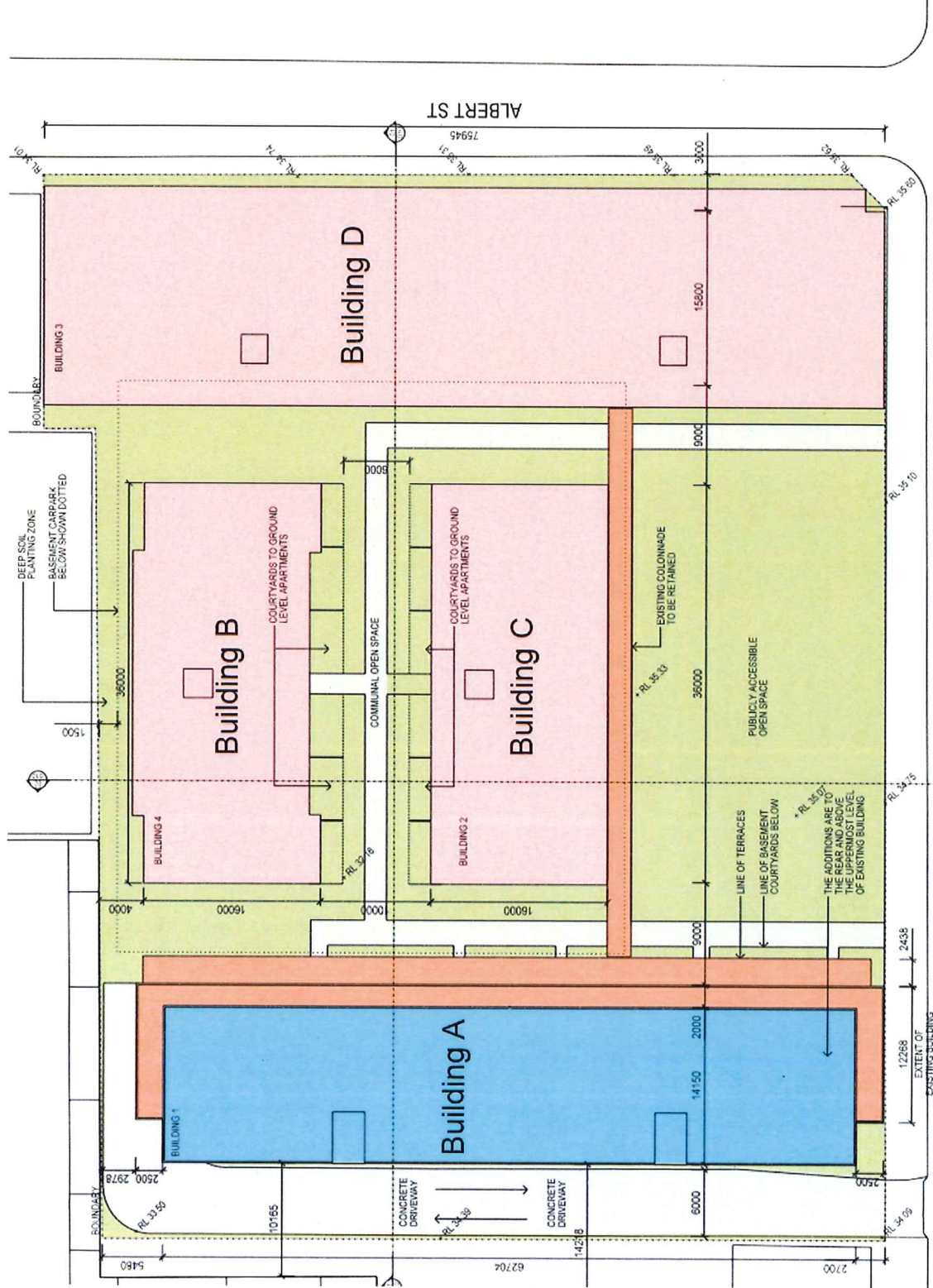


Figure 5: Approved Concept Plan layout (Base Source: MP07_0029)

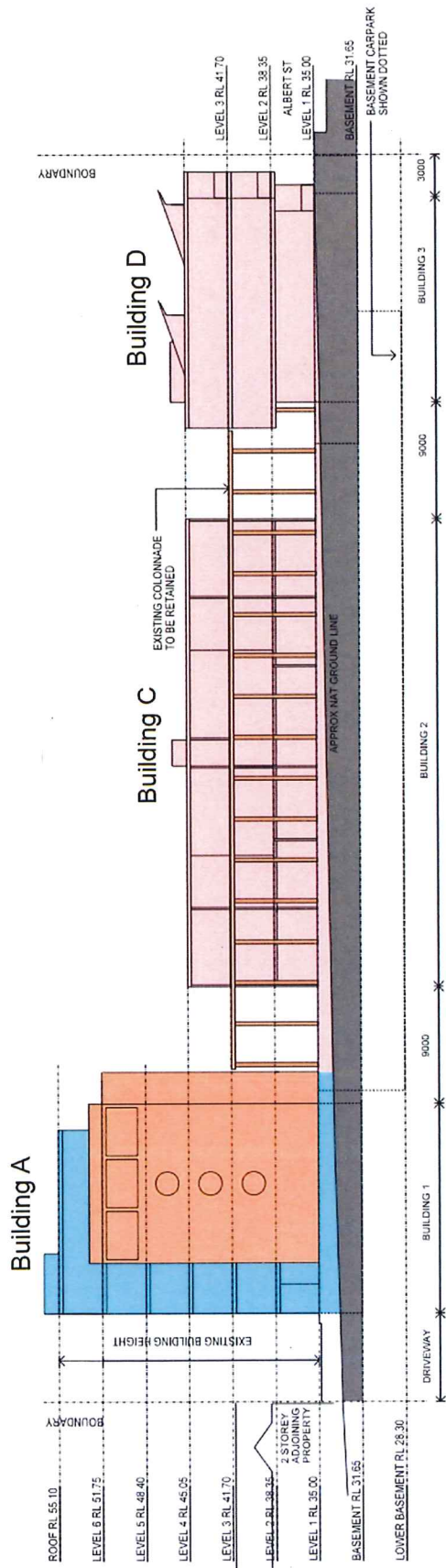


Figure 6: Approved building envelopes as viewed from Pitt Street (Base Source: MP07_0229)

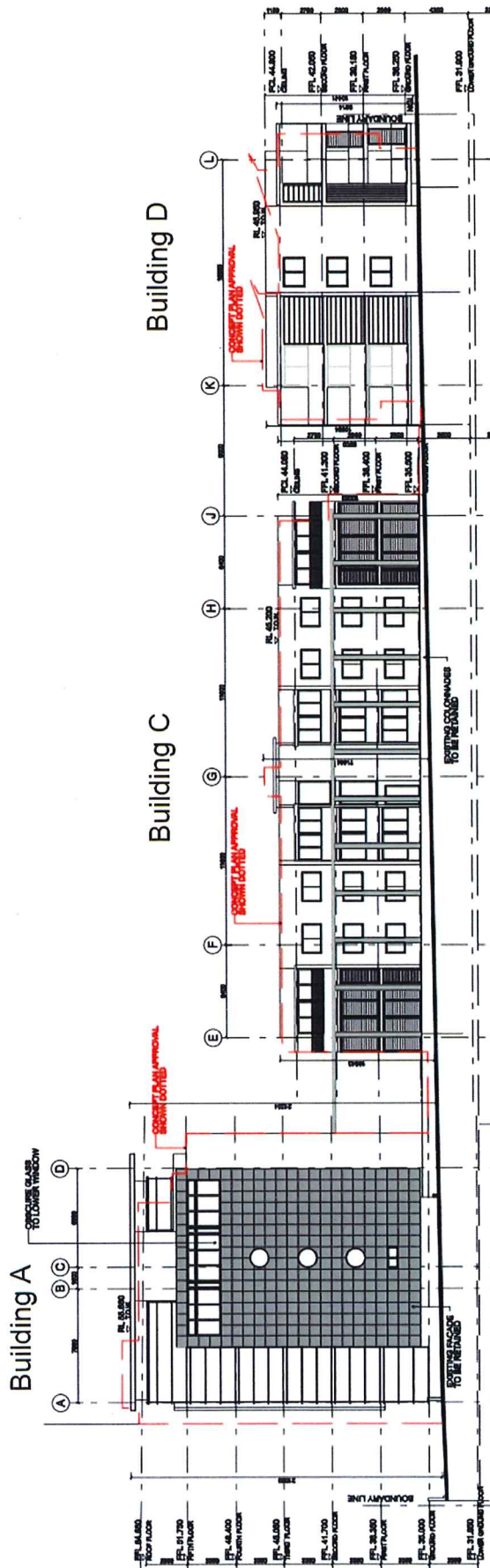


Figure 7: Approved eastern elevation (Pitt Street frontage) (Base Source: MP09_0068)

Table 1: Key components of the modification requests

Concept Plan Modification	
Aspect	Description
Built form	<ul style="list-style-type: none"> • Changes to approved building envelopes, including: <ul style="list-style-type: none"> ○ increase in the height of Building B from four to six storeys ○ increase in the height of Building C from four to six storeys ○ increase in the maximum FSR from 2:1 to 2.252:1.
Land use	<ul style="list-style-type: none"> • Introduction of 'neighbourhood shop' uses.
Project Approval Modification	
Aspect	Description
Built form	<ul style="list-style-type: none"> • Increase the height of Buildings B and C from four to six storeys (RL 45.2 m to RL 51.5 m), excluding lift overruns • Alterations to the façade design and materials and finishes.
Gross floor area	<ul style="list-style-type: none"> • Increase in the GFA by 1,746 m² from 13,846 m² to 15,592 m², comprising: <ul style="list-style-type: none"> ○ 15,451 m² residential GFA including 3,993 m² (25%) as affordable rental housing ○ 140 m² of 'neighbourhood shop' GFA.
Residential use	<ul style="list-style-type: none"> • Increase of 55 residential apartments from 158 to 213 comprising: <ul style="list-style-type: none"> ○ 6 studio apartments (3 %) ○ 95 1-bedroom apartments (45 %) ○ 94 2-bedroom apartments (44 %) ○ 18 3-bedroom apartments (8 %). • Of the total 213 apartments, 40-60 apartments will be dedicated as affordable rental housing.
Access	<ul style="list-style-type: none"> • Retention of the vehicle access point on the southern boundary of the site on Pitt Street • pedestrian access to the site from Pitt and Albert Streets.
Car parking	<ul style="list-style-type: none"> • Increase of 22 car parking spaces (from 138 to 160) located on two basement levels, comprising: <ul style="list-style-type: none"> ○ 134 residential spaces (including 32 accessible spaces) ○ 16 visitor spaces ○ 5 retail spaces ○ 2 car share spaces ○ 3 service spaces • A total of 14 motorcycle spaces.
Bicycle parking	<ul style="list-style-type: none"> • 245 bicycle parking spaces comprising: <ul style="list-style-type: none"> ○ 213 residential spaces ○ 21 residential visitor spaces ○ 11 retail spaces.
Heritage	<ul style="list-style-type: none"> • Adaptive reuse of the main hospital building with revised façade details (compared to current approval) • Reconstruction of the two storey colonnade along the eastern frontage of Building C
Capital investment value (CIV)	A \$19.39 million increase in investment on the site (total CIV \$67,544,484)

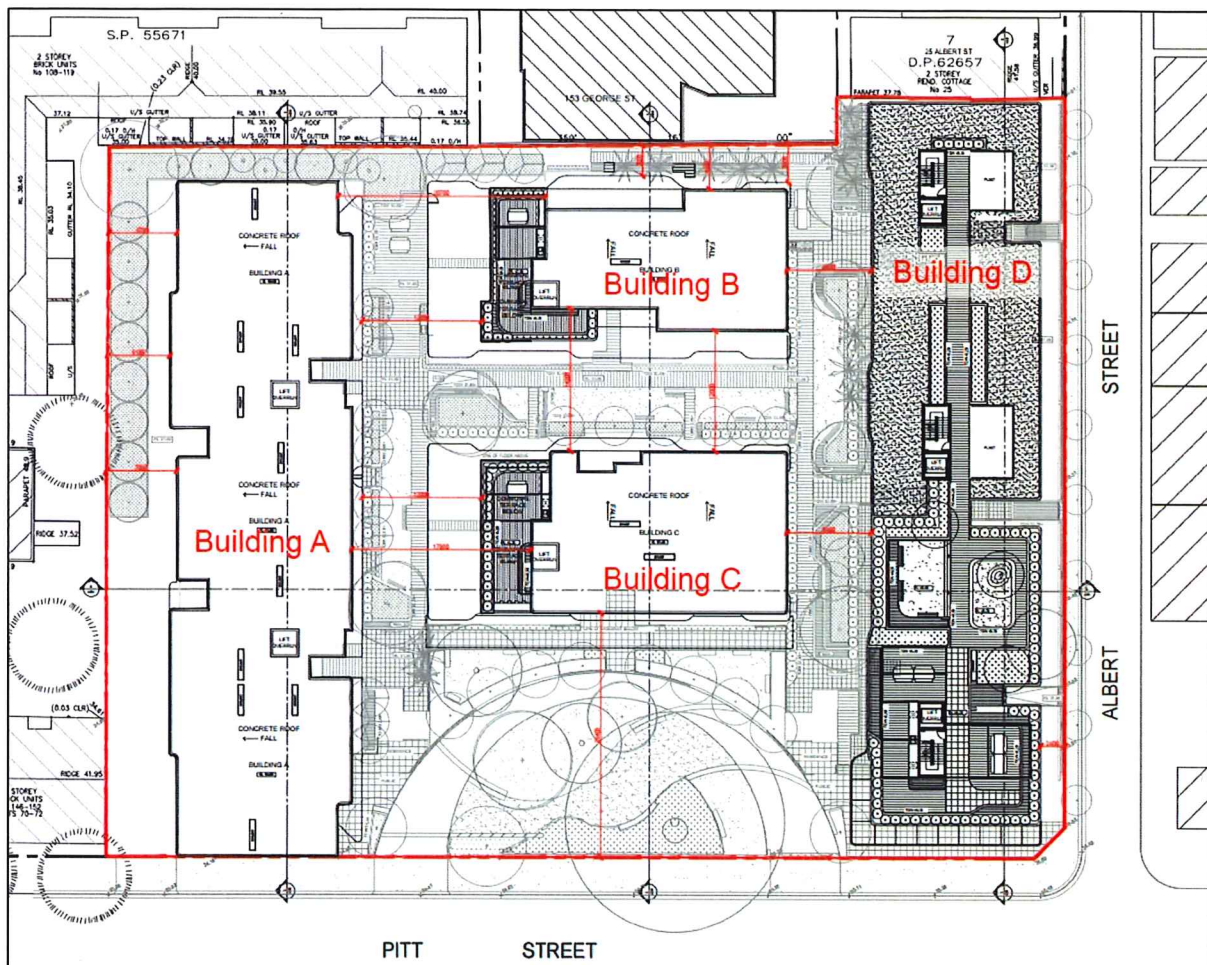


Figure 8: Proposed Site Plan (Base Source: Proponent's RtS)

2.2 Project need and Justification

The Proponent notes that since the original Concept and Project Approvals, a number of legislative, policy and demographic changes have occurred which support the introduction of affordable rental housing at a higher density and non-residential uses on the site. In addition, the Proponent has identified the opportunity to internally reconfigure apartments to provide a more efficient layout. These changes, together, provide the opportunity to provide increased housing density in close proximity to infrastructure and to include provision for affordable rental housing in an accessible location.

The Department considers the proposal is strategically well justified noting it is consistent with the aims and objectives of State, regional and local planning policies and strategies as it:

- will provide an increase of 55 apartments within Redfern which is well served by public transport, services and facilities consistent with the Premiers and State's priorities and the directions and actions of the Greater Sydney Region Plan and the Eastern City District Plan
- will provide 40-60 apartments (of the additional 55 apartments) as affordable rental housing for a minimum period of 10 years which will contribute to the renewal of affordable housing stock in Redfern and is consistent with the aims of State Environmental Planning Policy (Affordable Rental Housing) 2009 (ARH SEPP)
- will contribute to the 10,500 new affordable rental dwellings required to achieve Council's 7.5 % affordable rental housing target as set out in Sustainable Sydney 2030.
- is located within the 'area of influence' of the Central to Eveleigh Urban Transformation Strategy and will contribute to the revitalisation of the Redfern and Waterloo area

3. STATUTORY CONTEXT

3.1. Continuing Operation of Part 3A to Modify Approvals

The project was originally approved under Part 3A of the EP&A Act. The project is a transitional Part 3A project under Schedule 2 to the EP&A (Savings, Transitional and Other Provisions) Regulation 2017. The power to modify transitional Part 3A projects under section 75W of the Act as in force immediately before its repeal on 1 October 2011 is being wound up – but as the request for this modification was made before the 'cut-off date' of 1 March 2018, the provisions of Schedule 2 (clause 3) continue to apply.

Consequently, this report has been prepared in accordance with the requirements of Part 3A and associated regulations, and the Minister (or his delegate) may approve or disapprove the carrying out of the project under section 75W of the EP&A Act.

3.2. Modification of a Minister's Approval

Section 75W provides for the modification of a Minister's approval including revoking or varying a condition of the approval, or imposing an additional condition on the approval.

The Minister's approval for a modification is not required if the project, as modified, will be consistent with the existing approval. As this proposal seeks to make changes to the approved building envelopes and modify specific conditions of approval, further assessment and approval is required.

3.3. Delegated Authority

In accordance with the Minister's delegation of 14 February 2011, the Independent Planning Commission may determine the applications as Council has objected and more than 25 public submissions in the nature of objection have been received in response to the applications.

3.4. Environmental Planning Instruments

The following EPIs are relevant to the application:

- State Environmental Planning Policy (State Significant Precincts) 2005 (SSP SEPP)
- State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP)
- State Environmental Planning Policy 55 – Remediation of Land (SEPP 55)
- State Environmental Planning Policy No. 65 - Design Quality of Residential Apartment Development (SEPP 65)
- State Environmental Planning Policy (Affordable Rental Housing) 2009 (ARH SEPP).

With the exception of the ARH SEPP, the Department undertook a comprehensive assessment of the redevelopment against the abovementioned EPIs in its original assessment. The Department is satisfied the proposal remains consistent with all relevant EPIs. The Department has undertaken a detailed assessment of the proposal against SEPP 65 in **Appendix B**.

The Department has considered the provisions of the ARH SEPP in **Section 5.1** of this report and notes while it does not apply to the site, (insofar as allowing an uplift in floor space) it provides a relevant policy consideration in the context of the proposed modification.

3.5. Secretary's Environmental Assessment Requirements

Section 75W(3) of the EP&A Act provides that the Secretary may notify the Proponent of Secretary's Environmental Assessment Requirements (SEARs) with respect to a proposed

modification, and that the Proponent must comply with the SEARs before the matter will be considered by the Minister.

In this instance, following an assessment of the modification request, it was not considered necessary to notify the Proponent of SEARs, as suitable information was provided to the Department to consider the application.

4. CONSULTATION AND SUBMISSIONS

4.1. Exhibition

In accordance with section 75X(2)(f) of the EP&A Act, the Department publicly exhibited the applications for 47 days from 19 January 2017 until 6 March 2017 on the Department's website, at the Department's Information Centre and at Council's office and the Redfern Neighbourhood Service Centre.

The Department placed a public exhibition notice in the Central Sydney newspaper on 18 January 2017 and notified landowners and the relevant State and public authorities in writing.

The Department received a total of 47 submissions, comprising six submissions from public authorities and 41 submissions from the general public, including 39 objections. Copies of the submissions may be viewed at **Appendix A**. A summary of the issues raised in the submissions is provided at **Tables 2** and **3** below.

4.1.1. Public authority submissions

Table 2: Summary of public authority submissions to exhibition

City of Sydney (Council)
<p>Council objected to the modifications, on the following grounds:</p> <ul style="list-style-type: none"> • the proposed FSR uplift given the ARH SEPP does not apply to the site as it contains a heritage item • impacts of proposed additional height to Buildings B and C • inconsistencies with the Apartment Design Guide. <p>Council also raised additional concerns relating to:</p> <ul style="list-style-type: none"> • reliance on retail uses, food and drink premises within the development • insufficient building separation between the upper storeys of Buildings B and C and the surrounding buildings • heritage concerns with the retention of the colonnade and Building A • wayfinding and building expression • landscaping, deep soil area and communal open space • transport and carparking.
Heritage Division, Office of Environment and Heritage
<p>The Heritage Division did not object to the modifications. It also advised the proposed modifications would have a neutral impact on historic heritage compared to the current approval. However, it raised concerns in relation to the amended scheme's potential impact on historical archaeology, and requested a revised archaeological assessment to address this impact.</p>
Regional Operations Group, Office of Environment and Heritage
<p>The Regional Operations Group raised no issues with regard to biodiversity or flooding matters and noted that the Heritage Branch provided comment on Aboriginal cultural heritage issues.</p>
Sydney Water
<p>Sydney Water reviewed the proposed modifications and advised it had no further comments.</p>

Roads and Maritime Services of NSW (RMS)
Roads and Maritime Services (RMS) raised no objection to the proposed modifications and advised the proposal would result in a minimal impact to the classified road network.
Transport for NSW (TfNSW)
TfNSW did not object to the modifications. However, it raised concerns in relation to the: <ul style="list-style-type: none"> • proposed on-street loading, and recommended all loading and unloading occur within the site • recommended the Proponent prepare a Construction Pedestrian and Traffic Management Plan that considers the cumulative impact of major transport construction projects in the Sydney CBD and CBD fringe prior to the commencement of works on-site.

4.1.2. Public submissions

A total of 41 public submissions were received in response to the exhibition of both modification applications, comprised of 39 objections and two submissions providing comments. 77% (30) of submissions raising objections were received from residents of Redfern. The key issues raised in submissions are summarised in **Table 3**.

Table 3: Summary of key issues raised in public submissions to the modification requests

Issue	Proportion of submissions
Incompatibility with the scale of the surrounding built form	59%
Solar access and overshadowing	44%
Adverse increase in density	32%
Impact on heritage buildings	27%
Affordable housing should be within approved GFA	29%
Visual privacy impacts	37%
Acoustic privacy impacts	32%
Traffic impacts	51%
Impact on on-street parking availability	27%
Oppose non-residential uses	34%
Alleged unlawful demolition of colonnade and tree removal	24%
Delays in developing the site	24%

The Department's assessment of the key issues raised in public submissions is presented in **Sections 5.1 to 5.4** and a summary of the key issues considered by the Department is presented in **Table 9** in **Section 5.5**.

Other issues raised in public submissions (less than 20%) included:

- quality of façade details, building setbacks and the visual bulk of the buildings
- view, outlook and visual impacts
- poor amenity within site
- health impacts of substation
- impacts of the use of the roof terrace and access to Albert Street from Building D
- proposed affordable housing is not a long-term solution
- request additional acoustic assessment in relation to traffic noise and entertainment areas
- adequacy of parking, support increased parking rates and flaws in traffic assessment
- support non-residential uses although café space privatises public land
- request amended landscaping / planting
- developer's reputation on other developments and poor community consultation
- property damage / dust impacts of demolition activities and request for certain construction methodologies
- adequacy of bicycle parking
- concerns over waste collection.

4.2. Response to Submissions

Following the public exhibition of the applications, the Department placed copies of all submissions received on its website. The Department also requested the Proponent address the issues raised in the agency and public submissions, as well as several specific issues relating to built form, solar access, residential amenity, heritage, affordable housing, non-residential uses, and traffic impacts.

The Proponent provided a Response to Submissions (RtS) (**Appendix A**), which responds to the issues raised in submissions and contains amendments, further information and clarification of the key issues raised by the Department and in the agency and public submissions. The RtS includes the following key amendments to the proposals:

Table 4: Key amendments to the proposals outlined in the RtS

Aspect	Proposal as exhibited	Proposal as amended in the RtS	Difference
Concept Plan Modification			
Floor Space Ratio	2.31:1	2.252:1	- 058:1
Land Use	Introduction of food and drink premises and neighbourhood shops	Introduction of neighbourhood shops	
Project Approval Modification			
Gross Floor Area	15,972.4 m ² including: <ul style="list-style-type: none"> 4,790 m² (31%) affordable rental housing 	15,592.1 m ² including: <ul style="list-style-type: none"> 3,993 m² (25%) affordable rental housing 	- 385 m ² overall - 797 m ² affordable housing
Residential uses	An increase of 60 apartments to provide a total of 218 apartments comprising: <ul style="list-style-type: none"> 4 studio apartments (2 %) 102 x 1-bedroom apartments (47 %) 92 x 2-bedroom apartments (42 %) 20 3-bedroom apartments (9 %). Of the increase of 60 apartments, an indicative 60-80 apartments (4,790 m ²) will be dedicated as affordable rental housing.	An increase of 55 apartments to provide a total of 213 apartments comprising: <ul style="list-style-type: none"> 6 studio apartments (3 %) 95 x 1-bedroom apartments (45 %) 94 x 2-bedroom apartments (44 %) 18 x 3-bedroom apartments (8 %). Of the increase of 55 apartments, an indicative 40-60 apartments (3,993 m ²) will be dedicated as affordable rental housing.	- 5 apartments - 20 affordable rental housing apartments
Car parking	Increase of 33 car parking spaces (from 138 to 171) comprising: <ul style="list-style-type: none"> 137 residential spaces (including 36 accessible spaces) 16 visitor spaces 10 retail spaces 3 car share spaces 5 service spaces. 	Increase of 22 car parking spaces (from 138 to 160) comprising: <ul style="list-style-type: none"> 134 residential spaces (including 32 accessible spaces) 16 visitor spaces 5 retail spaces 2 car share spaces 3 service spaces. 	- 11 spaces

The Department made the RtS publicly available on its website and referred the RtS to the Council and the OEH for comment.

Council advised it maintained its objection on the basis the RtS did not address the issues raised in its original submission.

The **OEH** recommended conditions to:

- clarify the archaeological potential within the eastern and southern areas of the site and quantify the level of impact the proposed works would have on surviving archaeological resources
- require archaeological monitoring for excavation of more than 300mm depth within the eastern and southern portions of the site
- require an unexpected finds procedure elsewhere on the site.

The Department has recommended the OEH's conditions are incorporated in any modification of the Project Approval.

Copies of the submissions to the RtS may be viewed at **Appendix A**. The Department has considered the comments raised in the agency and public submissions during the assessment of the applications and has given specific consideration to the key issues raised in **Section 5** of this report and/or by way of recommended conditions in the draft instruments of modification at **Appendix B**

5. ASSESSMENT

The Department has considered the environmental assessments, the issues raised in the agency and public submissions, and the Proponent's RtS in its assessment of the proposals. The Department considers the key assessment issues are:

Concept Approval modification:

- density
- built form
- introduction of neighbourhood shops

Project Approval modification:

- heritage and archaeology
- design excellence
- residential amenity
- traffic, parking and travel demand.

The Department has considered the modification to the Concept Approval and Project Approval in **Sections 5.1** and **5.2**. A number of other issues have also been considered in **Section 5.3**.

5.1. Concept Approval modification

5.1.1 Density

The proposal seeks approval to amend the Concept Approval to increase the approved:

- gross floor area (GFA) from 13,846 m² to 15,592 m² (1,746 m²)
- FSR from 2:1 to 2.25:1.

The proposed additional GFA exceeds the 2:1 FSR limit identified for the site in the SSP SEPP. However, noting the additional floor space comprises affordable rental housing, the

Proponent is seeking this additional density in a manner consistent with that provided for under the ARH SEPP.

The ARH SEPP aims to facilitate the delivery of new affordable rental housing across NSW, and includes FSR bonuses where at least 20% of a development comprises affordable housing (for a period of ten years). The ARH SEPP broadly applies to all land where residential development is permitted except, as in the case on this site, where the site contains a heritage item.

Council and public submissions also raised concern with the use of the ARH SEPP, in particular:

- the ARH SEPP does not apply to sites containing a heritage item
- any affordable housing should be provided within a compliant scheme
- the additional floor space and increase in height of Buildings B and C, will have a negative impact on the heritage values of the former hospital site and the adjacent heritage conservation area
- the Proponent may not actually deliver the proposed affordable housing
- the proposal does not offer a long term solution to housing affordability.

The Department has carefully considered the concerns raised by Council and in the public submissions and acknowledges (given the presence of the heritage listed Building A on the site) the ARH SEPP does not apply in this case. Notwithstanding, the presence of a heritage item as one of the four approved buildings on the site should not derogate proper consideration of how the development may contribute to the broader planning objective of the ARH SEPP, being the delivery of affordable housing in locations with good access to transport and services.

The Department considers it is appropriate to consider the proposed modification request to the Concept Plan against the objectives of the ARH SEPP in conjunction with the concerns raised in the local community having regard to the relevant planning policy guidance.

The Department considers the site is highly suitable for accommodating additional density, being within 500 m walking distance of Redfern Station and 550 m of the future Waterloo Metro Station. Further, the creation of additional housing in this location is consistent with the NSW Government's commitment to provide new housing within close proximity to jobs, public transport and community facilities and services, as outlined in the Eastern District Plan.

The Department considers increasing the density of the development is acceptable for the following reasons:

- subject to the conditions of approval recommended in **Section 5.2.1**, the additional floor space would not adversely impact on the curtilage of the heritage item, or the values of the adjoining conservation area
- the proposal will provide affordable rental dwellings for a period of ten years consistent with the ARH SEPP which would provide accommodation for key workers within close proximity to public transport, employment opportunities, and existing community services and facilities. In addition, it would 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
- the proposal is compatible with the built form in the locality, and (subject to conditions) will not generate any unacceptable off-site amenity impacts (see **section 5.1.2**)
- the proposal is consistent with the aims, objectives and design quality principles of SEPP 65, and subject to the conditions of approval recommended in **Section 5.2.3**, is capable of complying with the relevant standards provided in the Apartment Design Guide (ADG).

5.1.2 Built form

The modification seeks to increase the height of Buildings B and C from four storeys to six storeys. Minor reductions are also proposed to the roof heights of Buildings A and D. These changes are summarised in **Table 5**.

Table 5: Comparison of the Approved (Concept Approval) and Proposed Building Heights

Building	Approved heights		Proposed heights		
	Building Height*	Visible from Street (storeys)	Building Height*	Visible from Street (storeys)	Difference
A	RL 55.10	6	RL 54.85	6	- 0.25 m
B	RL 45.05	Nil	RL 50.90	Nil	+ 5.85 m
C	RL 45.05	3	RL 51.40	5	+ 6.35 m
D	RL 46.05	3	RL 45.20	3	- 0.85 m

* excluding plant

Council and public submissions raised the following concerns with the proposed changes to the height of Buildings B and C:

- the additional storeys visually compete with the height of the former surgery building (Building A) which is a local landmark and heritage item
- the additional height would result in three medium rise buildings on the site rather than one as currently approved. This is inconsistent with the context of the site which is primarily comprised of two storey dwellings
- the additional height will be visible from the public domain.

The Department has considered the changes to Buildings B and C, as well as Buildings A and D below.

Buildings B and C

The Department notes the proposed increase in height of Buildings B and C, while two storeys greater than approved by the Concept Plan, is consistent with the maximum height of six storeys allowed in the SSP SEPP. In addition, the Department considers heights ranging up to six storeys on the site is compatible with the character of the surrounding area which similarly includes a variety of building forms including cottages, terraces, townhouses and apartment buildings ranging in height from two to six storeys (as outlined in **Section 1.1**).

The Department has considered the concerns raised in submissions and is satisfied the proposed increase in height of Building C will not be overbearing in the context of the existing Pitt Street streetscape noting that it:

- presents as a five storey building as the lowermost storey is located below ground level (**Figure 9** and **10**) and maintains an appropriate transition from Building D stepping up to Building A
- remains approximately 3.5 metres (m) (one storey) lower than the heritage listed Building A when viewed from Pitt Street, which in conjunction with the stepped upper level setbacks of 12 m to 16.9 m maintains its landmark qualities and visual dominance over Buildings B, C and D on the site (**Figure 9**)
- is setback approximately 24 m from the Pitt Street frontage behind the landscaped forecourt, which maintains the prominence of Building A (which has a zero setback to the Pitt Street frontage) in its current setting (**Figure 8**). This generous setback, along with retained trees and new landscaping toward the Pitt Street frontage, will reduce any potential visual prominence of the additional two storeys on the streetscape
- will include the former two storey colonnade as a key design element which assists in the heritage interpretation of the site and emphasises a two storey human scale along the eastern Pitt Street frontage.

Building B is located at the rear of the site, and is screened from view from Pitt and Albert Streets by Buildings C and D located along these frontages. The Department is also satisfied that Building B responds in a positive manner to Building A, being approximately 4 m lower in height and providing a setback of 12 to 20.7 m to the upper two levels (Figure 11).

The Department has also considered the impacts to neighbouring properties in terms of building separation, privacy and solar access and is satisfied the proposed increase in height of Building B will not cause any material impacts to the amenity of neighbouring properties, in comparison to the approved four storey building form (Section 5.2.3).

The Department also notes the proposed increase in height will provide for the provision of affordable housing on the site, without adverse impacts on the heritage building (Section 5.2.1) and is consistent with the objectives of the ARH SEPP and Sustainable Sydney 2030.

The Department therefore supports the proposed modifications to Buildings B and C, and concludes the increase in height maintains an appropriate scale relationship Building A on the site and the surrounding area.



Figure 9: Eastern elevation of Building C, with Building A to the left and Building D to the right (Source: Proponent's RtS)

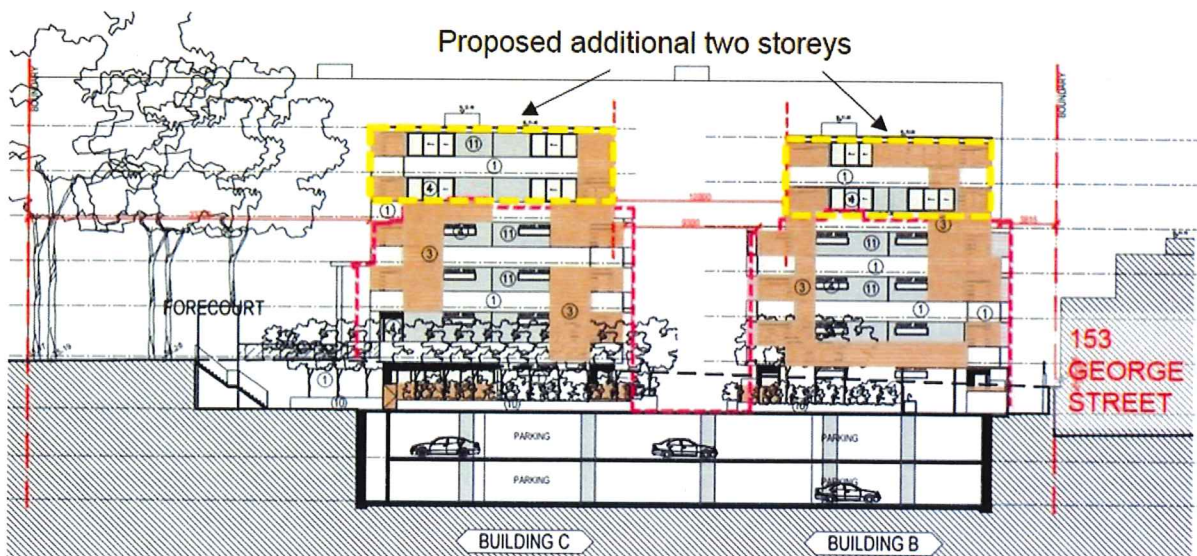


Figure 10: North/South cross section showing Buildings B C and the neighbouring property 153 George Street to the right (Base Source: Proponent's RtS)

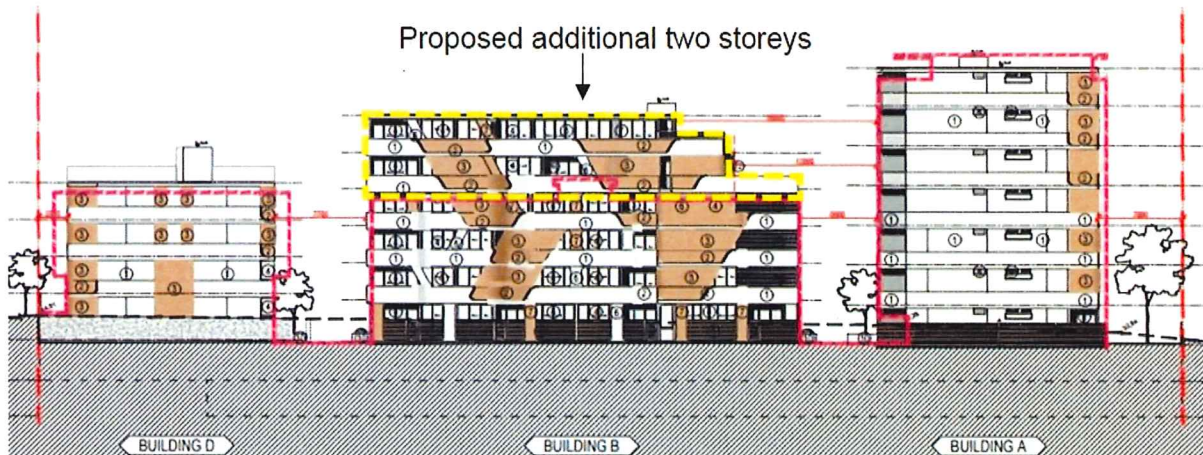


Figure 11: Western elevation of Building B, with Building D to the left and Building A to the right (Source: Proponent's RtS)

Building A

The Concept and Project Approvals allow for a one storey addition to Building A to accommodate a total of six storeys. The Project Approval required the uppermost level of the building be setback an additional 2.6 m from the main façade to the western site boundary to:

- reduce the visual bulk of Building A
- manage the potential overshadowing impacts of the development at the residential properties immediately west of the site.

The proposed modifications to Building A will marginally reduce the overall height of the building in comparison to the approved project. However, the proposal is inconsistent with the requirements of the Project Approval, as level 5 of the western elevation of Building A is not set in 2.6 m from the main façade.

The Department recommends, for the same reasons which applied in the assessment of the original Project Approval that an additional setback should be provided to the uppermost level to minimise the bulk of the additional storey and maintain acceptable solar access.

The Department therefore recommends a new requirement on both the Concept and Project Approvals requiring amended plans showing a 2.6 m setback to the uppermost level of Building A to western boundary of the site.

Building D

The proposed modifications to Building D would result in a minor (0.25 m) increase in the height of the approved building (compared to the Project Approval) but remains 0.85 m lower than the maximum allowable maximum height within the Concept Approval (**Table 5**).

The Department supports the proposed minor changes to Building D, which remain consistent with the Concept Approval and provide an appropriate transition in form and scale from the surrounding low scale development on Albert Street to the taller buildings within the site.

The Department has considered the concerns raised by Council and the community about the architectural design and façade detailing of Building D and location of building entrances as part of its assessment of the modification to the Project Approval in **Sections 5.2.2** and **5.2.3**.

5.1.3 Introduction of neighbourhood shops

The proposal seeks to introduce neighbourhood shops as a permissible use within the Concept Approval.

Council and public submissions raised concern with the introduction of retail uses within a residential area.

The Proponent responded to the issues raised in submission by removing the previously proposed food and drink premises given the potential impact these uses may have on the amenity of the surrounding residential area. However, the Proponent considers a small amount of neighbourhood shops (140 m²) will activate the publicly accessible landscaped forecourt located along the site's Pitt Street frontage and also provide local services to residents.

The Department supports the introduction of neighbourhood shops on the site as:

- neighbourhood shops are permissible both on the site and within the surrounding residential area under the SSP SEPP and SLEP 2012
- neighbourhood shops will cater for the day-to-day needs of both future residents and the surrounding community who live or work in the local area
- the nature and proposed scale of neighbourhood shops is unlikely to cause amenity impacts on the surrounding area in terms of noise, traffic, odour etc
- the amount of retail floor space will not compete with the more substantial retail offering in Redfern Town Centre.

5.2. Project Approval modification

5.2.1 Heritage and Archaeology

The five storey former Rachel Forster Hospital surgery building (Building A) and the two storey former administration block (Building C) are collectively identified as a heritage item in the SSP SEPP. The surrounding area is a heritage conservation area within the SLEP 2012, including a local heritage item immediately to the north at 130-132 Pitt Street.

The site also contains potential archaeological significance.

The proposed modification retains Building A, however seeks approval for changes to architectural expression of Buildings A and C and removal and re-construction of part of the colonnade, rather than retention of the colonnade in its entirety as required by the Project Approval.

Council and public submissions raised the following concerns with the proposal:

- the impact of the additional building height on the heritage conservation values of the former Rachel Forster Hospital and the adjoining heritage conservation area
- the impacts of the additional building height on the historic view corridors along Pitt Street
- the removal of sections of the colonnade associated with the former administration block (Building C)
- the changes to the architectural expression of Buildings A, C and D
- the potential impact of construction work on significant fabric within Building A.

The Proponent has made a number of design amendments in response to concerns raised by Council and the community including:

- redesigning the northern elevation of Building A to reference the horizontal banding created by the balcony structures of the former surgery building (**Figure 13**)
- redesigning the eastern elevation of Building C to reference the Inter-War Functionalist design of the former administration block and increase the prominence of the colonnade (**Figure 14**).
- providing an increased setback of 12 m between Buildings B and C and Building A to retain its visual prominence from significant vantage points within the Pitt Street view corridor (**Figure 9**)

- redesigning the elevations of Building D to respond to the verticality of the terrace forms along Albert Street.

The Proponent also provided a Structural Report, demolition plans, and a revised Heritage Impact Statement to justify the unauthorised demolition of the colonnade, and assess the heritage impacts of the revised architectural scheme.

The Department has considered the concerns raised by Council and in public submissions, as well as the recommendations of the endorsed Conservation Management Plan (CMP) for the site as part of its assessment.

The Department considers the key issues are:

- consistency with the CMP
- archaeological heritage

Consistency with the Conservation Management Plan

The CMP sets out the primary significance of former Rachel Forster Hospital site is historic, social and associative. The CMP identifies the key attributes of the site that identify it as the former Rachel Forster Hospital (**Figure 12**) are:

- the northern and eastern elevations of Building A
- the colonnade fronting Pitt Street
- the landscaped forecourt on Pitt Street.

The CMP concludes that preserving the site's significance is not dependent on preserving the existing layout and fabric of the site in its entirety. The CMP outlines future changes to the site's physical layout should be assessed in accordance with the principles and policies of the CMP.

The Department has considered the proposal against the CMP in detail in **Appendix D** and concludes, with the exception of the proposed changes to the colonnade adjacent to Building C, the proposed modifications are consistent with the CMP. The Department has considered the impact of the proposal on key site attributes outlined in the CMP below.

Building A

The CMP identifies the northern and eastern elevations of Building A have exceptional significance (Category A) and form part of the iconic views to the site from the Pitt Street view corridor (**Figure 16**). The CMP also notes the remaining elevations of Building A are of moderate significance (Category C).

The Department notes the eastern elevation of Building A has been retained in generally good repair but the northern elevation in particular is largely dilapidated. In addition, the Project Approval permits the full reconstruction of the northern elevation of Building A, as well as minor demolition and re-construction works on the eastern elevation.

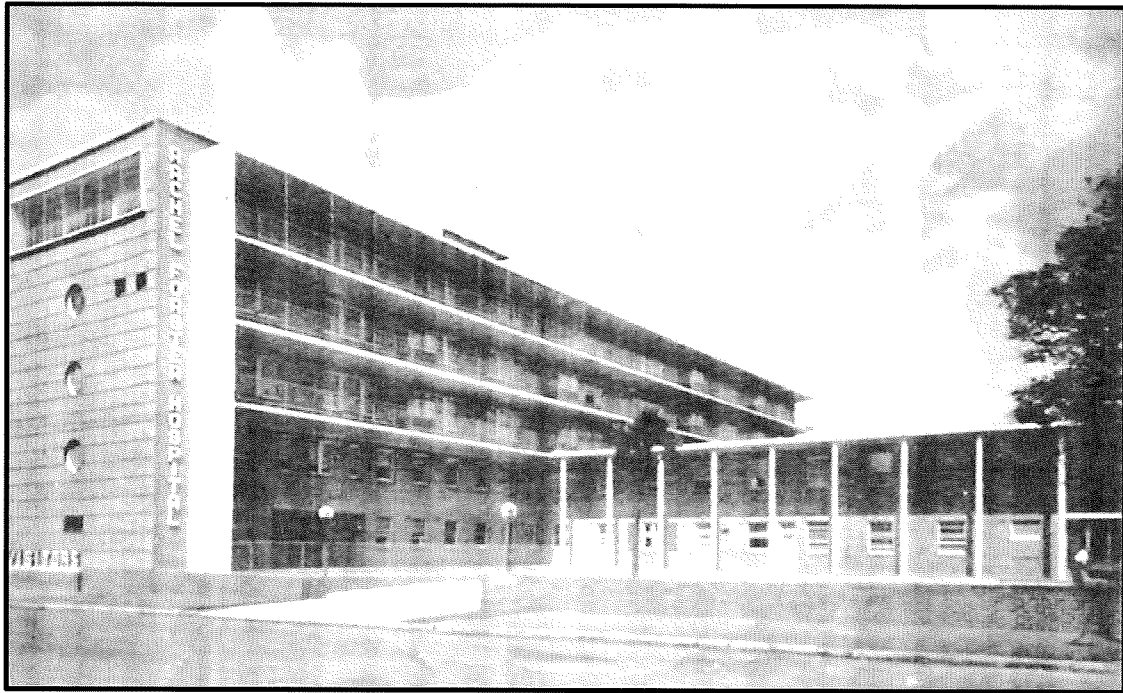


Figure 12: Northern and eastern elevation of the former surgery building (Building A) and eastern elevation of the former Administration Block (Building C) and the forecourt as viewed from Pitt Street (Source: Rachel Forster Hospital CMP)

The proposed modification seeks to revise the design of the northern and eastern elevations of Building A (**Figure 13**).

The Department has assessed the proposed modifications to the northern elevation of Building A and notes the design has been revised to incorporate horizontally proportioned balcony structures to reference the architecture of the former surgery building. The Department supports this design revision as it will enable the interpretation of the former Rachel Forster Hospital from within the Pitt Street view corridor.

The Department notes the uppermost level of Building A (level 5) reads as an extension to the building when viewed from Pitt Street. The Department considers this is less successful than the currently approved design for Building A which provides a visually recessive uppermost floor which reads as a lightweight building element compared to the dominant building form below (**Figure 13**).

To address this, the Department recommends a condition requiring the redesign of the northern and eastern elevations of level 5 to incorporate suitable architectural treatments (which could include varied building materials, colours and/or setbacks) to ensure level 5 is visually recessive and can be read as a new building element when viewed from Pitt Street. The proposal retains the majority of the significant fabric on the eastern elevation as per the recommendations of the CMP. The Department however considers the proposed powder coated aluminium window frames on the eastern elevation are unsympathetic to the existing predominantly brick and concrete fabric of this elevation. The Department therefore recommends a condition requiring the window treatments on the eastern elevation of Building A be redesigned to be sympathetic to the existing building fabric.

The Department supports the architectural changes to Building A subject to further refinement as outlined in the recommended conditions above.



Figure 13: Comparison perspectives of the approved northern and eastern facades of Building A (above) and the proposal (below)

Building C

The CMP identifies the eastern elevation of the former administration block (Building C) has exceptional significance (Category A) with particular reference to the two storey colonnade which runs along the entire frontage of Building C and connects to Building A and D.

The Project Approval permits the full demolition of the former administration block, with the exception of the colonnade structure, which is to be retained in full. The approval also permits the construction of a new four storey building in this location.

The modification seeks approval to:

- increase the height of Building C from four to six storeys
- change the architectural expression, detailing and materiality of Building C
- reconstruct the section of the colonnade adjacent to the eastern elevation of Building C.

The Department has considered the increase in height of Building C in **Section 5.1.2** and concludes the increase in height maintains an appropriate scale relationship Building A and the upper level setbacks maintain an appropriate visual separation between Building C and the heritage item, opening up important views from Pitt Street.

The two remaining key issues associated with the modifications to Building C are:

- changes to the colonnade
- architectural changes to the eastern elevation of Building C.

Colonnade

The eastern elevation of Building C previously featured a two storey colonnade running along the entire elevation of the building connecting the former administration block with the surgery building (Building A) and the outpatient building (Building D).

The Concept and Project Approvals require the retention of the entire colonnade in its entirety (**Figures 5 and 6**).

The Proponent has demolished the former administration block (Building C) and also dismantled the colonnade, which contravenes the conditions of the Concept and Project Approvals. The Department notes Council and public submissions raised concerns that the colonnade had been demolished without approval and commenced an investigation into the unauthorised removal of the colonnade in 2017. This issue remains under investigation by the Department's compliance team.

The Proponent has justified the removal of the colonnade on the basis that the demolition of the building left the colonnade columns unstable, and it was impractical to brace them. It therefore dismantled the colonnade and stored it on site for future re-construction. The application was supported by advice from Weir Phillips Heritage which outlines the requirements to properly store and conserve the columns prior to reinstatement.

The modification therefore seeks approval to reconstruct the section of the colonnade adjacent to the eastern elevation of Building C. However, it seeks not to reconstruct the sections of the colonnade between Buildings A and C and C and D (**Figure 5 and 6**).

The Department has considered the proposal, in light of the requirements of the Concept and Project Approvals, the concerns raised by Council and the community and advice provided by the Heritage Division in relation to the management of the dismantled colonnade structures.

The Department agrees with the comments provided by Council and the community and considers the reinstatement of the colonnade in its entirety is critical to the interpretation of the former administration block in this location and appreciation of the historic significance of the former Rachel Forster Hospital. The Department therefore recommends the Proponent reconstruct the colonnade in its original location, connecting to both Buildings A and D, consistent with the requirements of the current Concept and Project Approvals.

The Department also recommends conditions to ensure the columns of the colonnade are stored in a suitable location and preserved for the duration of the construction works, consistent with the recommendations of the Proponent's heritage consultant and the Heritage Division. The Department also notes that any approval will not compromise the ability for the

Department's compliance team to enforce the conditions of approval in relation to the unauthorised removal of the colonnade.

Architectural changes

The proposed modification seeks to revise the design of the eastern elevation of Building C (**Figure 14**). In response to concerns raised by Council, the Proponent has designed the eastern elevation of Building C to:

- introduce face brick and simple vertically proportioned fenestration on levels 1 and 2 to respond to the scale of the former colonnade and the architecture of the former administration block
- introduce upper level setbacks along the southern and eastern elevations of Building C to ensure the additional building height can be read as a new element from the Pitt Street view corridor.

The Department has assessed the proposed modifications to the eastern elevation of Building C and supports the architectural changes to the eastern elevation for the following reasons:

- the revised design provides for the interpretation of the scale and architecture of the former administration block
- the upper level setbacks to Building A enable the relationship between the former surgery building and administration blocks to be interpreted from within the Pitt Street view corridor, as per the intent of the CMP
- subject to the conditions outlined above, the two storey colonnade will remain the key defining element of Building C as viewed from Pitt Street consistent with the CMP.

Archaeology

The proposed modification also involves minor adjustments to the approved building footprints. Whilst these modifications are minor, they have the potential to disturb parts of the site containing locally significant archaeological resources.

The Proponent provided a Revised Historical Archaeological Assessment (HAA) which notes the potential for historical archaeological resources in the eastern and southern portions of the site. The HAA recommends:

- the preparation of an Archaeological Research Design report identifying the excavation methodology proposed to conduct archaeological investigations on-site
- all excavations greater than 300 mm in depth should be monitored in the eastern and southern margins of the site
- an unexpected finds protocol for the remainder of the site
- identified protocols for the on-going management of potential archaeological resources, if they are encountered during construction works, including interpretive opportunities, storage and reporting.

The OEH has reviewed and supports the recommendations of the Proponent's HAA. It also recommends the Proponent prepare an Archaeological Research Design and Methodology Statement to:

- clarify the extent of archaeological potential in the eastern and southern portions of the site
- quantify the level of impact on surviving archaeological resources.

The Department has recommended changes to Condition B11 of the Project Approval to ensure a revised Archaeological Research Design and Methodology Statement is prepared addressing these requirements prior to the issue of any amended Construction Certificate.



Figure 14: Comparison perspectives of the approved eastern facade of Building C (above) and the proposal (below)

5.2.2 Design excellence

Modification B2 of the Concept Approval requires future applications to demonstrate design excellence in accordance with Schedule 3, Part 5, Clause 22 of State Environmental Planning Policy (Major Development) 2005 (now the SPP SEPP) which provides key considerations with regards to

- (a) architectural design, materials and detailing
- (b) improving the quality and amenity of the public domain,
- (c) sustainable design principles.

The Department has considered the modification against these requirements as follows:

Architectural design, materials and detailing

The Department considers the proposed architectural details, materials and finishes display a high standard of design as the proposal:

- provides an appropriate response to the Inter-War Functionalist design of the surgery building and administration blocks of the former Rachel Forster Hospital, in particular:
 - the proposal will continue to provide for the conservation of significant building fabric on the eastern elevation of Building A
 - the proposed modifications to the northern elevation of Building A provide for the interpretation of the horizontal balconies of the former surgery building, which were a prominent feature from the Pitt Street view corridor
 - the eastern elevation of Building C has been redesigned to incorporate exposed brick and simple vertically proportioned fenestration on levels 1 and 2 to ensure the reconstructed colonnade remains a dominant architectural feature from the Pitt Street view corridor
- provides a materials palette responding to the materials and finishes of the former surgery building and administration blocks, as well as the adjoining developments along the Pitt and Albert Street frontages of the site
- provides appropriate façade detailing along Albert Street responding to the strong vertical emphasis and fine grid established pattern of terraces along Albert Street.

Improving the quality and amenity of the public domain

The Department considers the proposal will improve the form and external appearance of the building and the quality and amenity of the public domain for the following reasons:

- the scale and architectural design of Buildings A, C and D along the Pitt and Albert Street frontages provides an appropriate interface between the development, the public domain and neighbouring properties
- the revised landscape scheme will continue to retain the significant relationship between the landscape forecourt and the surgery building and administration block of the former Rachel Forster Hospital.

Sustainable design principles

The Department is satisfied that the proposal incorporates sustainable design principles, including building form and layouts which achieve solar access and ventilation in accordance with the ADG and well as meeting or exceeding water, thermal comfort and energy standards in accordance with the BASIX SEPP. As such, the Department has concluded the proposal is consistent with the sustainable design principles of the SPP SEPP.

Given the above, the Department has concluded the proposed development exhibits design excellence consistent with the requirements of the SSP SEPP.

5.2.3 Residential amenity

The original Project Application was assessed against the requirements of SEPP 65 and the former Residential Flat Design Code (RFDC) and the Department concluded the development, as approved, provides a high level of amenity for future residents.

In 2015 the RFDC was replaced with the Apartment Design Guide which aims to achieve better design and planning for residential apartment development.

Noting the proposal seeks approval for an uplift in height and density in two of the four approved building envelopes, as well as wholesale changes to apartment layouts within all four buildings, the Department has considered the modification against the requirements of SEPP 65 and the ADG.

The Department is satisfied the proposal complies with the objectives of SEPP 65 and the ADG (**Appendix C**), with the exception of minor variations to the building separation, cross ventilation, and private open space standards within the guidelines. The Department also notes that while consistent with the ADG recommendations, public submissions have raised concern about potential amenity impacts caused by the proposed rooftop communal open space and building entries to Building D from Albert Street.

The Department's assessment of these proposed variations to the ADG and the community concerns around the rooftop communal open space and building entries is provided below.

Building separation

The ADG recommends the following building separation distances (**Table 6**) to maximise visual and acoustic privacy, and mitigate potential bulk and scale impacts of new apartment buildings.

Table 6: Separation distances recommended in the ADG

Building Height	Recommended Separation Distance		
	Habitable Rooms/Balconies	Habitable and non-habitable rooms	Non-habitable rooms
Up to 4 storeys (12 m)	12 m	9 m	6 m
Between 5 and 8 storeys (between 12 and 25 m)	18 m	12 m	9 m

The proposal seeks approval for minor adjustments of the building footprints but generally maintains the approved building separation between Buildings A, B and D and the neighbouring properties of:

- 7 m - 14.5 m between Building A and the neighbouring residential buildings to the south
- 6.5 m between Building A and the neighbouring residential buildings to the west
- 3.1 m – 9.5 m between Building B and the neighbouring residential building to the west
- A zero setback between Building D and the western property boundary

In addition, building separation within the site is on balance maintained with commensurate increases in separation to offset areas where separation is reduced including:

- increases between Building A and Buildings B/C (5.5 - 6.6 m to 6.6 - 9 m)
- increases between Building D and Buildings B/C (6.5 7m to 8.4 m)
- reduction between Buildings B and C (9 - 11 m to 8 - 10 m) (**Figure 17**).

Council and public submissions raise concern that the proposed increase in apartments in Building A exacerbates privacy and noise impacts between future residents and the existing residential development to the south. Council has also raised concern about building separation within the site.

The Department has considered the concerns raised in Council and public submissions, and considers the key issues are:

- the separation between Building A and the neighbouring properties to the south
- the separation between Building B to the neighbouring properties to the east
- internal separation between Buildings A, B and C.

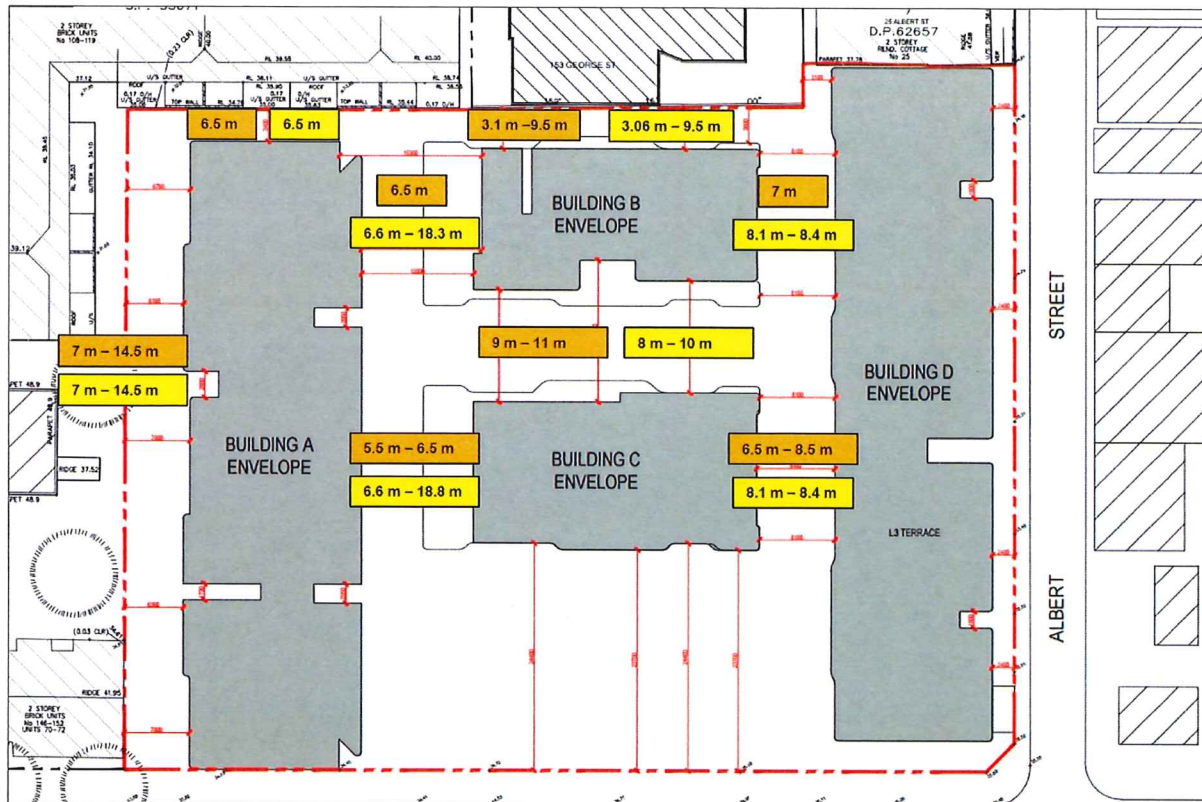


Figure 17: Comparison of the approved (orange) and proposed (yellow) building separation (Base source: Proponent's RtS)

Building A and neighbouring properties to the south

The modification maintains an equivalent separation of 7 m to 14.5 m between Building A and the properties to the south as provided by the Project Approval. The approved separation is less than recommended by the ADG (12 - 18 m).

The Department has carefully considered the impacts of the amended apartment layout, noting the concerns raised by Council and in public submissions about the impacts on privacy to the neighbouring properties to the south. The Department considers the proposal maintains an acceptable separation and is unlikely to cause adverse privacy impacts as:

- the reconfigured apartments in the eastern and western portions of Building A are adjacent to two storey buildings on the neighbouring site and therefore the proposed apartments within Building A will largely overlook the roof space rather than into apartments. In addition, privacy to private courtyards will be maintained by the existing landscaping and pergolas to rear courtyards of these dwellings
- the layout of apartments in the central portion of Building A, while facing a six storey building on the neighbouring site, is unchanged from the Project Approval and includes two dual aspect apartments with living areas and primary private open space oriented to the north away from the properties to the south.

The Department therefore considers the change to apartment layouts and increase in dwelling density within Building A can be accommodated without adverse privacy impacts to the properties to the south.

Building B and neighbouring properties to the east

The two additional storeys proposed for Building B are setback 3 to 4.4 m from the western boundary which adjoins 153 George Street. While the ADG would require a 6 m boundary setback for the lower four levels and a 9 m setback for the two upper most levels, the Department considers a lesser setback is acceptable in this case as:

- 153 George Street is a converted warehouse building which in part is built to the boundary with no windows to habitable rooms on its eastern elevation facing the site
- the portions of the building which are not built to the boundary have a similar setback to the proposal (approximately 4 m) providing a total separation of approximately 8 m which is considered acceptable noting the absence of habitable room windows on the eastern elevation
- there are no solely east facing private open spaces within 153 George Street, with all the balconies to 153 George Street having a principle outlook to the north and west
- the two additional storeys sit above the four storey height of 153 George Street (**Figure 10**) and predominately overlook the roof of the building
- the Proponent's overshadowing analysis demonstrates only minor additional impacts to upper level bedrooms of neighbouring properties to the east between 9 am and 10 am in mid winter, from the two additional storeys, which does not cause adverse overshadowing impacts.

Internal separation

The Department notes the proposed separation between Buildings A, B, C and D is largely consistent with the Project Approval (**Figure 17**) and on balance the proposal achieves an equivalent level of separation.

While the separation is less than the 12 m recommended separation distances within the former RFDC (now ADG), this was supported on the basis that:

- suitable mitigation measures (highlight/frosted windows, privacy screens, screen planting) were provided to provide an acceptable level of visual and acoustic privacy for building occupants
- Building A was retained and the location of Building C was constrained by the need to retain the colonnade on the eastern edge of the building.

Although the colonnade has been removed, as outlined in **Section 5.2.1** the reconstruction of the colonnade in its original location is critical to preserve the heritage values and interpretation of the former hospital on the site. The Department therefore accepts the same justification for the reduced separation between Buildings B and C.

In relation to the further reductions, the Department notes that while separation at its narrowest is 8 m, the curved facades provide undulating separation which on balance is considered to achieve equivalent levels of visual and acoustic privacy to the approved development. In addition, the 1 m reduction in separation between Buildings B and C, is offset by equivalent increases in separation between Buildings A and D and B/C.

In relation to the two additional levels of Buildings B and C, the ADG recommends a minimum separation of 18 m. The proposal seeks approved for separation of:

- 12 m to 15.3 m between Buildings B and C
- 12 m to 17 m between Buildings C and A
- 12 m to 20.7 m between Buildings B and A.

The Department has carefully considered this reduction and in this instance considers the proposal is acceptable as living rooms, bedrooms and balconies are arranged to prevent direct overlooking. The Department, however notes that there is one location where balconies directly face one another. These balconies have a dual aspect toward the north and east, and the on this basis Department recommends the balconies of apartments 321 and 419 within Building B are provided within screening to ensure their primary view is to the north, rather than to east and into the balcony of apartments within Building C.

Cross ventilation

The ADG seeks to ensure 60% of apartments are naturally cross ventilated. The ADG outlines that natural cross ventilation is achieved by apartments having more than one aspect with direct aspect to prevailing winds. This includes dual aspect, cross through and corner apartments.

The Proponent contends that 136 (64%) apartments are cross ventilated, using combination of cross-through and corner apartments, as well as slots and skylights to provide cross ventilation.

Council notes that due to the limited separation between buildings within the site, there is a conflict between cross ventilation and visual and acoustic privacy. Council considers that only 37% of apartments are naturally cross ventilated, with up to 45% if specific corner apartments are provided with additional windows. Council also notes the openable areas of highlight windows is not known and that some apartments in Building A rely on bathrooms to achieve cross ventilation.

The Department has considered the Proponent's justification, as well as the analysis undertaken by Council and its own assessment which has concluded that 47 apartments (22%) are either cross-through or dual aspect apartments. Of the remaining apartments, the Department notes:

- 39 corner apartments (18%) within Buildings A, B and C have a dual aspect but only contain an operable highlight window on one of the elevations, which may limit the effectiveness of cross ventilation
- 24 apartments (11%) within Buildings A and D have highlight windows to slots within the building facade to achieve cross ventilation
- 9 apartments (4%) within the uppermost levels of Buildings B, C and D are provided with ventilation grills/risers to achieve cross ventilation
- 12 corner apartments (5%) within Building A have a dual aspect but only have a bathroom window opening on the northern or southern elevation to preserve the structure of the heritage building.

When considering the alternative measures proposed in these apartments, the Department considers that a total of 131 (61%) of apartments achieve good levels of ventilation, irrespective of being cross ventilated, achieving the intent of the ADG.

To ensure the effectiveness of the alternate ventilation methods identified above, the Department recommends further testing to confirm the slots, highlight windows and ventilation grills/risers will achieve adequate pressure differential to be considered cross ventilated as a condition of approval. Where testing does not demonstrate this effectively, the Department recommends the design is modified to the satisfaction of the Department to achieve adequate cross ventilation to at least 60% of apartments.

Private open space

36 of the 38 ground level apartments (94%) have courtyards ranging from 5.2 m² and 12 m² which does not meet the ADG recommendation for all ground level apartments to have a minimum of 15 m² of private open space.

Although the majority of the ground floor apartments are below the minimum private open space recommended in the ADG and the former RFDC, the Department has concluded future building occupants will be provided with a suitable amount of open space for the following reasons:

- residents have access to 3,590 m² of landscaped, communal and publicly accessible open space on the site, which cumulatively exceeds the minimum area recommended by the ADG (1,730 m²)
- the majority of ground floor private open space is either adjacent to a communal courtyard area or a street, which provides an enhanced level of amenity by increasing the perception of open space available to these apartments
- all upper level apartments meet the minimum private open space recommended in the ADG, with 64 upper level apartments (46%) exceeding the recommendations.

Given the above, the Department supports the proposed variations to the minimum private open space standard for ground level apartments.

Communal open space

The proposal seeks to provide two rooftop communal areas on the southern end of Buildings B (95 m²) and C (86 m²) and a larger area occupying the eastern half of Building D (493 m²)

Concerns were raised in public submissions about the potential noise and privacy impacts caused by the use of the rooftop communal open space, in particular the larger area on Building D.

The Department considers the communal rooftop open space will provide facilities for passive recreation for future residents and is an important aspect of the proposal. In addition, it is consistent with the guidance provided in the ADG which supports open space on roof tops subject to acceptable visual and acoustic privacy, comfort levels, safety and security considerations.

To ensure the use of the rooftop area doesn't impact on the amenity of the surrounding area, the Department recommends:

- acoustic screening and landscaping be provided to mitigate potential noise transfer and overlooking of neighbouring properties
- the communal roof top areas only be accessible to residents between 7 am and 10 pm, Mondays to Saturdays and 8 am and 10 pm, Sundays
- all external lighting comply with AS 4282 -1197 Control of the obtrusive effects of outdoor lighting, and be subject to a curfew after 10 pm daily
- noise testing to verify the effectiveness of these measures in preventing noise impacts to surrounding residential properties.

Building entries

The Project Approval providing direct access to eight apartments within Building D, in addition to two additional building entrances along Albert Street.

The proposal seeks to modify the internal configuration of Building D by removing individual access to apartments from Albert Street and providing three lobby entrances into the building.

Public submissions also raised concern about amenity impacts from the entries from Building D onto Albert Street, including increase in pedestrian traffic through Albert Street, which has the character of a quiet laneway.

The Department has considered the concerns raised in submissions, however, it considers the proposed changes to the Albert Street frontage will not have a material impact on the amount of pedestrian traffic through Albert Street, compared to the approved development. The Department supports the three building entrances along Albert Street as they provide a street address for the building, connecting to and addressing the public domain consistent with the recommendations for good design in the ADG.

5.2.4 Traffic, Parking and Travel Demand Management

Traffic

Concerns were raised in public submissions the modification would result in addition adverse traffic impacts.

The Department assessed the traffic impacts associated with redeveloping the site for residential purposes as part of the original Project Approval and found the traffic generated by the development could be accommodated within the existing road network.

The Proponent provided a Traffic and Parking Assessment in support of the proposed modification which modelled the traffic impacts associated with the proposed increase in density and the introduction of retail floor space.

The Department notes the *RMS Guide to Traffic Generating Development 2001* provides guidance on traffic generation and parking impacts of new developments (2001 Rates). These rates were used to estimate the traffic generated by the Project Approval. However, in August 2013, the RMS published updated traffic generation rates for high density residential developments. The revised rates are based on surveys undertaken in 2010 across the Sydney Metropolitan area (and regional NSW) and indicate a reduction in traffic generation over the previous 10 years (2013 Rates).

The Proponent's Traffic and Parking Assessment has utilised the 2013 rates (**Table 8**) and demonstrates the traffic generated by the proposal (based on the 2013 Rates) is less than the traffic generated by the Project Approval (2001 Rates). The assessment found:

- the proposal would generate a total of 45 vehicle movements/hour in the am peak and 36 trips/hour in the pm peak, which is slightly less than the traffic generated by the approved project (**Table 8**) and significantly less than that of the previous hospital use
- the Pitt/Redfern Street intersection would continue to operate with a good level of service (LOS B) with acceptable delays and spare capacity.

Table 8: Comparison of approved and proposed vehicle movements in the AM and PM peak periods

	Approved traffic generation (2001 rates)		Predicted traffic generation (2013 rates)	
	AM Movements (vehicles/hr)	PM Movements (vehicles/hr)	AM Movements (vehicles/hr)	PM Movements (vehicles/hr)
In	11	34	13	26
Out	35	12	32	10
TOTAL	46	46	45	36

The Department accepts the conclusions of the Proponent's assessment and agrees the proposed development would generate a similar level of traffic to the approved project. RMS also advised the proposal would have minimal impacts on the classified road network. On this basis, the Department concludes the proposed modification would not result in any unacceptable impacts on the surrounding road network.

Parking and Travel Demand Management

The Project Approval provides for a maximum of 138 car parking spaces in accordance with the rates within the former South Sydney Development Control Plan 11 (SSDCP 11).

The modification seeks approval to increase the number of car parking spaces servicing the development from 138 car parking spaces to 160 car parking spaces, including 2 car share spaces and 3 service vehicle parking spaces.

The proposal also seeks approval to provide 245 bicycle parking spaces (213 resident, 21 visitor, and 11 retail spaces) and 14 motorcycle parking spaces which complies with the requirements of SDCP 2012. Access to the basement car park will be retained off Pitt Street as per the current approval.

A comparison of the car parking provided for the Project Approval, required under the current SLEP 2012 rates and proposed is provided in **Table 9**.

Table 9: Comparison of the approved and proposed car parking rates and SLEP 2012 requirements

Project Approval (158 apartments)			Proposed Modification (213 apartments)			
	SSDCP 11 rates	Requirement		Proposed	SLEP rates	Requirement
			6 x studio apartments	1	0.2	1
67 x 1 bedroom apartments	0.5	33	95 x 1 bedroom apartments	38	0.4	38
77 x 2 bedroom apartments	0.8	62	94 x 2 bedroom apartments	75	0.8	75
14 x 3 bedroom apartments	1.2	17	18 x 3 bedroom apartments	20	1.1	20
Visitor car parking	1 spare per 6 apartments	26	Visitor car parking	16	0.167 spaces	16
			Retail	5	1 space per 60 m ²	2
			Car share	2	1 space per 60 spaces	3
			Service	3	1 space per 50 apartments and 0.5 spaces per every 50 apartments thereafter	2
TOTAL		138 spaces		160 spaces		157 spaces

Council commented that car and bicycle parking should be provided in accordance with the requirements of SLEP 2012 and SDCP 2012. Council also commended that the Proponent should prepare a Green Travel Plan.

Some public submissions included comments that the proposal does not provide sufficient parking, while others commented that parking should be reduced.

The Department has considered the concerns raised in public submissions and the comments provided by Council, and supports car and bicycle provision on site in accordance with the rates in SLEP 2012 and SDCP 2012 as:

- the site is within walking distance of existing train and bus services in Redfern and also the planned metro station in Waterloo which will encourage use of public transport rather than private vehicle use
- bicycle parking will encourage cycling by residents and visitors as a means of both transport and recreation
- the surrounding area includes timed parking, and is within an area covered by Council's resident parking scheme which Council uses to effectively manage the demand for on-street parking in the locality

The Department recommends conditions allowing for a total of 157 spaces in line with the SLEP 2012 as well as the preparation and implementation of a Green Travel Plan to support the objectives of *Sustainable Sydney 2030*.

5.3 Other Issues

A number of other assessment issues were identified in the EA. These issues are considered to be minor in nature and are assessed in **Table 10**.

Consideration	Recommended Conditions
Affordable Rental Housing	
<ul style="list-style-type: none"> The Department supports the proposed 3,993 m² of affordable rental housing floor space within the proposal to support the uplift in density as discussed in Section 5.1.1. The Proponent has not yet identified which apartments will be allocated for affordable rental housing or entered into any binding agreement with an affordable rental housing provider for this space. The Department has recommended conditions of approval to ensure the affordable rental housing is provided for a minimum of ten years consistent with the ARH SEPP. 	<p>The Department has recommended new conditions on the Project Approval requiring the Proponent to:</p> <ul style="list-style-type: none"> provide a Plan for the Secretary's approval identifying the apartments proposed for use as affordable rental housing, prior to the issue of an amended Construction Certificate ensure all dwellings identified as affordable rental housing in the plan approved by the Secretary are used for this purpose for a minimum of ten years from the date of the issue of an Occupation Certificate ensure all accommodation used for affordable rental housing is managed by a registered community housing provider ensure a Section 88B instrument is registered on the title of each affordable rental housing dwelling, prior to the issue of an Occupation Certificate.
Development Contributions	
<ul style="list-style-type: none"> The development of the site requires contributions for additional public facilities, infrastructure and affordable housing in accordance with the Redfern Waterloo Authority Contributions Plan 2006 and the Redfern-Waterloo Authority Affordable Housing Contributions Plan administered by the Urban Growth Development Corporation (UGDC). Urban Growth has confirmed the proposed affordable housing within the development is able to offset the contribution which would be required for affordable housing. Urban Growth has also provided the total contribution to be paid for other public facilities and infrastructure at a cost of 2% of the cost of work. 	<p>The Department has recommended modifications to conditions B2 to require additional contributions for public facilities and infrastructure, based on the cost of work. The Department also recommends Condition B3 is deleted</p>
Waste Management	
<ul style="list-style-type: none"> The proposal provides waste chutes for residents which will transport all waste and recycling to designated storage areas within the basement. The Proponent then proposes that waste bins be transported to the street for on-street collection by Council's waste vehicles (for 	<p>The Department has recommended modifications to conditions B13, F5 and F9 of the Project Approval to:</p> <ul style="list-style-type: none"> ensure residential and retail waste is managed stored in

Consideration	Recommended Conditions
<p>residential waste) and a private contractor (for retail waste).</p> <ul style="list-style-type: none"> • Council does not support on-street collection of waste. • The Department notes the basement design and height clearance precludes Council's waste vehicles from entering the site to collect waste. The Proponent however has indicated that private waste vehicles, being smaller than Council's vehicles can be accommodated within the basement (subject to redesign) • The Department therefore recommends the Proponent redesign the basement to allow for private waste collection vehicles, which are smaller in size, to access the site to enable all waste storage and collection to be contained within the site. 	<p>accordance with the revised WMP</p> <ul style="list-style-type: none"> • all residential and retail waste is collected by a private waste contractor via the basement car park.
Construction Traffic	
<ul style="list-style-type: none"> • Several infrastructure projects, including the Sydney Metro City and South West project, were approved after the determination of the Project Application. The cumulative increase in construction vehicle movements from these projects has the potential to impact on traffic and bus operations within the vicinity of the site, as well as the safety of pedestrians and cyclists particularly during commuter peak periods. • To address this issue TfNSW requested a condition requiring the Proponent to prepare and submit a Construction Pedestrian and Traffic Management Plan (CPTMP) with TfNSW's CBD Coordination Office, for approval prior to the commencement of construction works. 	<p>The Department has recommended modifications to Condition B26 of the Project Approval to manage the potential construction traffic impacts of the project.</p>
Substation	
<ul style="list-style-type: none"> • Public submissions raised concern with potential health impacts associated with the operation of the substation proposed on the lower ground level of Building A. • The Department notes the Concept Plan identified a new substation may be required to replace the substation located on Albert Street. • The Department also notes the installation of a new substation within the Building A must comply with Energy Australia's current design standards, which it considers adequate ensures public safety and health. 	<p>The Department has recommended a new condition of Project Approval B34 requiring the substation to be designed and constructed in accordance with Energy Australia's standards.</p>
Tree Removal and Landscaping	
<ul style="list-style-type: none"> • To determine the final extent of tree removal, and ensure the on-going management of trees on-site, Condition B17 of the Project Approval requires the Proponent to: <ul style="list-style-type: none"> ○ re-examine the health of all existing trees to be retained on-site, prior to the issue of a Construction Certificate ○ where trees are identified as being unsafe/unsuitable for retention, a revised landscape plan must be submitted to identify replacement trees ○ submit a landscape maintenance plan prior to the issue of a Construction Certificate. • Public submissions raised concern that unlawful removal of trees has occurred, including a Jacaranda tree (tree 14) near the corner of Pitt and Albert Streets. • The Arboricultural Assessment forming part of the approved project, provides for the removal or all trees on 	<p>The Department has recommended a new condition of Project Approval to ensure a substantial native tree, with a minimum canopy spread of 8 m at maturity is planted in proximity to the location of former tree 5.</p>

Consideration	Recommended Conditions
<p>site, except trees 3, 4 and 6 and trees 18 and 19 on the neighbouring site. The approved landscape plan provided for the retention of these trees, however also incorporated tree 5 (which was recommended for removal in the Arboricultural Assessment).</p> <ul style="list-style-type: none">• The Department has confirmed on-site that trees 3, 4, 6, 18 and 19 have been retained and are shown for retention on the proposed landscape plan. All other trees (including tree 14 and 5) have been removed.• The Department has considered the concern raised by residents about the removal of the Jacaranda tree however is satisfied this has been removed in accordance with the Project Approval.• The Department also notes that tree 5 was shown on the approved landscape plan and while it has been removed in accordance with the recommendations of the Arboricultural Assessment, the Department recommends a condition requiring the Proponent to plant a substantial native tree, with a minimum canopy spread of 8 m at full maturity in proximity of the location of former tree 5.	
Delays in construction and construction impacts	
<ul style="list-style-type: none">• The Project Approval for the redevelopment of the site was granted in July 2013 and lapses after a period of 5 years, unless, as is the case on this site, the development has been commenced.• The Proponent has commenced works on site, including the demolition of buildings and site preparation works. In this regard, there is no imposition on the Proponent to commence and complete construction within a certain timeframe.• The Department understands the concerns in the community about living near a building site for years, however notes that following determination of this modification, the Proponent has indicated it intends to move forward with construction and delivery of the project.• The conditions of approval include the requirement for a Construction Management Plan which would include measures to minimise the impacts to neighbouring properties including noise, vibration, dust and site safety. The Department's compliance team is also investigating complaints made into construction practices and the need for a hoarding to properly secure the site.	<p>The Department considers the existing conditions of approval, enforced by the Department's compliance team, adequately control construction practices and impacts on surrounding properties.</p>
Modifications to Statement of Commitments	
<ul style="list-style-type: none">• The Department notes the Statement of Commitments for the Concept and Project Approvals include references to several technical reports which have been superseded by the proposed modification. To address this issue, the Department has recommended new conditions of approval requiring the Proponent to amend the Statement of Commitments to the satisfaction of the Secretary within three months of the determination of the modification applications.	<p>The Department recommends conditions of approval to ensure the Statement of Commitments are updated to the satisfaction of the Secretary within three months of the determination of the modification applications.</p>

5.4 Consideration of key issues raised in public submissions

Table 11 presents the key issues raised in the public submissions (as summarised in **Table 11**), and how the Department has considered each issue.

Concern raised	Department's consideration
Incompatibility with the scale of the surrounding built form	<ul style="list-style-type: none"> The Department considers the proposal is compatible with the height and scale of surrounding development which ranges from one to six storeys. Further the proposal is consistent with the maximum height allowed in the SSP SEPP and includes appropriate setbacks to upper levels (Section 5.1.2).
Solar access and overshadowing	<ul style="list-style-type: none"> The proposal maintains an acceptable level of solar access to neighbouring properties in mid winter (Section 5.2.3).
Adverse increase in density	<ul style="list-style-type: none"> The Department supports the increased density on the site noting it 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 (Section 5.1.1).
Impact on heritage buildings	<ul style="list-style-type: none"> The Department recommends the reinstatement of the colonnade in its entirety. Otherwise the Department considers the proposed additional height and architectural changes to the buildings on site remains consistent with, and in some areas provides further improvement to the response to heritage in the original Project Approval and is consistent with the CMP for the site (Section 5.2.1).
Affordable housing	<ul style="list-style-type: none"> The Department supports the increase in density on the site to deliver affordable housing for ten years consistent with the intent and objectives of the ARH SEPP (Sections 5.1.1 and Section 5.3).
Visual and acoustic privacy impacts	<ul style="list-style-type: none"> The Department considers the proposal maintains an acceptable level of visual and acoustic privacy to adjoining properties and within the site, subject to conditions for screening in some locations and restrictions on the use of the rooftop area on top of Building D (Section 5.2.3).
Traffic and parking impacts	<ul style="list-style-type: none"> The Department considered the proposal would generate a similar level of traffic to the approved project and have minimal impacts on the surrounding road network. In addition, an appropriate level of parking is provided consistent with Council's SLEP 2012 and SDCP 2012 requirements (Section 5.4.2).
Oppose non-residential uses	<ul style="list-style-type: none"> The Department supports the introduction of neighbourhood shops on the site and considers the small scale uses proposed on the site are unlikely to cause amenity impacts on the surrounding area (Section 5.1.3).
Alleged unlawful demolition of colonnade and tree removal	<ul style="list-style-type: none"> The Department notes the site is under compliance investigation for a number of actions, including the removal of the colonnade. The Department recommends the Proponent reconstruct the colonnade in its entirety consistent with the requirements of the current Concept and Project Approvals (Section 5.2.1). The Department notes all trees removed on site have been undertaken consistent with the Arboricultural Assessment forming part of the Project Approval (Section 5.3).
Delays in developing the site and construction impacts	<ul style="list-style-type: none"> The Department notes the Proponent has commenced works on site, including the demolition of buildings and site preparation works and there is no imposition on the Proponent to commence and complete construction within a certain timeframe. The Department considers the existing conditions of approval, enforced by the Department's compliance team, adequately control construction practices and impacts on surrounding properties (Section 5.3).

6 CONCLUSION

The Department has assessed the merits of the proposal taking into consideration the issues raised in all submissions, the Proponent's RtS, and is satisfied the impacts have been satisfactorily addressed by the proposal and through the Department's recommended conditions.

The Department concludes the proposal provides an excellent opportunity to deliver a significant amount of affordable housing with good access to public transport, community facilities and services. The affordable rental housing will be delivered in accordance with the intent and objectives of State Environmental Planning Policy (Affordable Rental Housing) 2009, which would otherwise apply if the site did not contain a heritage item.

The Department supports the increase in height of Buildings B and C and associated increase in floor space to accommodate affordable rental housing:

- aligns with the maximum height permitted under the State Environmental Planning Policy (State Significant Precincts) 2005
- will not adversely impact on the heritage values of the site and maintains an appropriate relationship with other buildings on the site
- is compatible with the desired future character of the area
- will continue to provide an acceptable level of amenity to neighbouring properties and within the site.

The Department supports the introduction of neighbourhood shops on the site, to serve the local community. The Department also supports the proposed car parking and bicycle parking provision, and considers the proposal is unlikely to cause adverse traffic or on-street parking impacts in the locality.

The proposal consistent with directions and actions in the Greater Sydney Region Plan and the Eastern City District Plan and is justifiable on the grounds of the substantial contribution it will make to the affordable rental housing stock in Redfern.

Following on from its assessment of the project, the Department considers the project is approvable, subject to conditions of approval (outlined in **Appendix A**). This assessment report is hereby presented to the Independent Planning Commission for determination.



Ben Lusher
Director
Key Sites Assessments



Anthea Sargeant 26/3/18
Executive Director
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