



Supplement to Concept Plan Application for the redevelopment of the former Rachel Forster Hospital, Redfern

July 2007

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1 Introduction

This submission supplements the Environmental Assessment prepared by *SJB Planning* and supporting documentation included with the Concept Plan Application lodged with the Department of Planning on 29 June 2007, for the redevelopment of the former Rachel Forster Hospital site at Redfern. The submission provides additional information requested by the Department to ensure satisfaction of the Director General's Requirements issued for the project on the 15 May 2007.

The information includes the following:

- Assessment of the Concept Plan against the key guidelines contained in the Residential Flat Design Code to supplement the SEPP 65 Design Principles prepared by Lippmann Associates.
- Supplementary assessment of the shadow impacts of the Concept Plan based on the shadow diagrams prepared by Lippmann Associates.
- Summary of the findings of Supplementary Archaeology Assessment prepared by Archaeological & Heritage Management Solutions, Pty Ltd, which is separately submitted.
- Supplementary assessment of the potential social and economic impacts of the Concept Plan.

The supplementary information further demonstrates that the Concept Plan does not have any significant adverse impacts, is consistent with the relevant statutory and policy requirements and is suitable for the site.

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2 State Environmental Planning Policy 65 Design Quality of Residential Flat Buildings (SEPP 65)

A comprehensive assessment of the SEPP 65 Design Quality Principles prepared by Lippmann Associates is included in Appendix I of the Environmental Assessment. SEPP 65 is supported by the Residential Flat Design Code, which provides further detail of how to achieve the design principles contained in SEPP 65. The following provides an assessment of the proposal against the key guidelines and provisions of the Design Code to demonstrate that the Concept Plan is a quality design and will enable the achievement of good design in the detailed design stage to be undertaken with the future Project Application. This information supplements the SEPP 65 Design Statement provided with the EA.

2.1 Local Context

Building Depth

Guidelines:

- An apartment building depth of 10 -18 metres is appropriate (18m measured from glass line to glass line – i.e excluding balcony)
- Developments that propose wider than 18 metres must demonstrate how satisfactory daylight and natural ventilation are to be achieved.

Comment: The proposed maximum building depths satisfy this guideline:

• Building 1	16.155m (excluding balcony)
• Building 2 and 4	14m (excluding balcony)
• Building 3	17.7m (excluding balcony)

Building Separation

Guidelines:

- Separation for buildings up to four storeys in height:
 - 12m between habitable rooms/balconies.
 - 9m between habitable rooms/balconies and non-habitable rooms.
 - 6m between non-habitable rooms.
- Building five to eight storeys in height:
 - 18m between habitable rooms/balconies.
 - 13m between habitable rooms/balconies and non-habitable rooms.
 - 9m between non-habitable rooms
- Separation controls may be varied in response to site and context constraints.
- Allow zero separation in appropriate contexts.
- Coordinate building separation controls with side and rear setback controls. In suburbs where a strong rhythm has been established between buildings, smaller separations may be appropriate.
- Coordinate building separation controls with controls for daylight access, visual privacy, and acoustic privacy.
- Developments that proposed less than the recommended distances must demonstrate that daylight, urban form and visual and acoustic privacy has been satisfactorily achieved.

Comment: Buildings 2, 3 and 4 do not exceed 4 storeys and Building 1 is six storeys above ground level. It is considered that the separation guidelines for buildings up to four storeys are most relevant to this proposal. The following provides a summary the proposed building separation:

Buildings	Separation
Building 1 to Buildings 2 & 4	9m
Building 2 & 4	10m
Building 3 to Buildings 2 & 4	7m

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Building 1 & adjacent apartments (south)	10.165m – 14.218m
Building 1 & adjacent apartments west	Level 1 = 7.275m Levels 2-5 = 2.275 Level 6 = 5.478m
Building 4 to adjacent apartments (west)	4m
Building 4 to adjacent warehouse	3.7m
Building 3 to adjacent two storey brick cottage.	Nil

The building separation guidelines are considered to be inappropriate for this proposal given:

- Retention of the existing heritage elements (Building 1 and the colonnade) and open space has predetermined the building separations.
- The proximity of the adjoining development to dividing boundaries. The warehouse and two storey cottage to the west are both built to the boundary. The same applies to part of the two storey townhouse style apartments located to the west and south.
- The surrounding development is characterised by buildings with small separation distances, for example terrace houses.

Having regard to the above the proposed separation distances are considered appropriate for the following reasons:

- The northern elevation of Building 1 faces the southern wall of Buildings 2 and 4. The eastern and western elevations will be primary elevations of Building 2 and 4. The living areas will be orientated to the east and west and not to the south. In this regard the 9m separation between the northern elevation of Building 1 and southern elevations of Buildings 2 and 4 is considered adequate for ensuring privacy.
- The 10m separation between Buildings 2 and 4 is considered adequate given the three storey scale of the buildings. The internal building and apartments layouts will be addressed with the Project Application and will further mitigate potential privacy impacts with the determination of apartment orientations and balcony locations.
- The southern elevation of Building 3 faces the northern wall of Buildings 2 and 4. As stated above the eastern and western elevations will be primary elevations of Building 2 and 4. In this regard the 7m separation between the southern elevation of Building 3 and the northern elevations of Buildings 2 and 4 is considered adequate for ensuring privacy.
- The 10.165m – 14.218m separation between Building 1 and the adjacent apartments to the south generally complies with the recommended separation distances. Potential privacy impacts are limited by the grade separation between the two sites and window configuration of the adjacent apartments.
- The separation between Building 1 and adjacent two storey apartments to the west primarily retains the existing setback. The potential for privacy impacts is considered to be minimal given that Building 1 is principally orientated to the north. It is envisaged that apartment layouts that will be proposed in the Project Application will seek to optimise the buildings orientation with primarily north-facing living areas and balconies. Furthermore, the grade separation and difference in height between Building 1 and the two storey apartments minimises the potential for direct views and overlooking.
- The 4m separation between Building 4 and the adjacent two storey apartments to the west is considered adequate given the existing apartments are partly built to the boundary. The potential for privacy impacts will be minimal given the grade separation and future landscaping/screening that will be provided along the western boundary.
- The separation distances between Building 4 and adjacent warehouse is considered adequate as it will not have any privacy impacts.
- The zero setback between Building 3 and the two storey cottage to the west is considered appropriate as it maintains the existing situation and does not impact on privacy.
- As outlined in the Section 2.5 Daylight Access and Section 3 Analysis of Shadow Impacts, adequate daylight access can be achieved for the proposal and overshadowing impacts on the adjacent apartments are minimal.

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Street setbacks

Guidelines:

- *Identify desired streetscape character.*
- *Minimise overshadowing of street and buildings.*
- *Consider secondary upper level setbacks to reinforce desired scale of buildings on the street.*
- *Underground parking structures, awnings and balconies may encroach on the setback.*

Comment: The existing street setbacks have been principally maintained. The setback to Pitt Street is maintained for Buildings 1 and 2 to enable the retention of the existing heritage elements and provision of the proposed public open space. Building 3 has a nil setback to Pitt Street to ensure consistency with the existing setback of Building 1. Building 3 has a 3.2m setback to Albert Street at the lower and ground levels, which is reduced to 1.5m on levels 2 and 3. The setback to Albert Street is consistent with the adjacent terrace houses. Overall the street setbacks maintain the heritage and landscape characteristics of the site and streetscape, and are consistent with adjacent development.

Side setbacks

Guidelines:

- *To retain or create rhythm or pattern of development that positively defines the streetscape so that space is not just what is left over around the building form.*
- *Consider building separation, open space and soil zones.*
- *Relate setbacks to existing streetscape pattern.*

Comment: The rear and side boundary setbacks are discussed in Building Separation above.

Building Height and FSR

The proposed height and FSR is controlled by Clause 21 of Part 5, Division 3 of the SEPP (Major Projects) and is discussed in the SEPP 65 Design Statement and Section 6.1 of the Environmental Assessment.

2.2 Site Configuration

Open space

Guidelines:

- *Communal open space should generally be between 25-30% of site area.*
- *Where development are unable to achieve the recommended communal open space, such as those in dense urban areas, they must demonstrate that residential amenity is provided in the form of increased private open space and/or in public open space.*
- *Minimum private open space for each apartment is 25m² at ground level/above podium with a minimum dimension of 4m.*

Comment: A limited area of communal open space has been provided in lieu of the public open space proposed to Pitt Street. The proposed public open space is approximately 1060m², which equates to approximately 15% of the site area. This will provide a public benefit to the community who will be able to access the space. At the same time it ensures amenity for future residents of the development who will have direct access to open space.

The proposed communal open space is principally intended to accommodate landscaping to ensure privacy and visual amenity for future residents. The communal open space is located between Buildings 2 and 4 and on the northern and southern sides of Building 4. The total area of communal open space is approximately 550m².

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As this Concept Plan application does not seek approval for internal building layouts or apartment layouts, the final configuration of private open space will be determined in the subsequent Project Application. However, the concept plans indicates the potential for ground level apartments to be provided with private open space in the form of courtyards. The plans also indicate balconies with a minimum depth of 2m can be accommodated within the proposed building envelopes for above ground apartments.

Deep soil zones

Guidelines:

- *Optimise provision of deep soil zones.*
- *25% of open space to be deep soil zone.*

Comment: The proposed public open space will primarily comprise a deep soil zone. A deep soil zone is proposed along the western boundary to allow for established landscaping to screen the adjacent warehouse.

Landscape Design

Guidelines:

- *Improve amenity of open space with landscape design, including shade and screening.*
- *Contribute to streetscape and public domain.*
- *Improve energy efficiency and solar efficiency of dwellings and microclimate of private open spaces.*
- *Design landscape with regard to site characteristics.*
- *Contribute to water and stormwater efficiency.*
- *Provide sufficient depth of soil above pavers*
- *Minimise maintenance by robust landscape elements.*

Comment: The final landscaping design will be resolved in the future Project Application. The Landscape Concept Diagram & Principles prepared by Oculus – Landscape Architects contained in Appendix D of the Environmental Assessment, demonstrates that the landscaping of the site can be provided in accordance with the above guidelines to enhance the quality of the development, streetscape and public domain.

Orientation

Guidelines:

- *Orient buildings to maximise north facing walls and provide adequate building separation.*
- *Respond to streetscape and optimise solar access.*
- *Courtyards and setbacks to northern boundaries.*
- *Optimise solar access to living spaces and private open space by orienting them to the north.*
- *Building elements to maximise sun in winter and shade in summer.*

Comment: Buildings 1 and 3 both have a northern orientation. These are the largest buildings within the development and will accommodate the largest number of apartments. While the apartment layout does not form part of the Concept Plan and will be the subject of a Project application, the orientation of these buildings ensures that the majority apartment living areas and private open spaces will have a northern orientation for optimum sunlight and daylight. Buildings 2 and 4 both have an east west orientation.

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2.3 Site Amenity

Safety

Guidelines:

- *Delineate private and public space.*
- *Optimise visibility, functionality, and safety of building entrances.*
- *Improve opportunities for casual surveillance.*
- *Minimise opportunities for concealment.*

Comment: As outlined in Section 7.15 of the Environmental Assessment the principles of *Crime Prevention Through Environmental Design* (CPTED) have been taken into consideration in the design of buildings, open space and landscaping to maximise community safety and minimise crime and anti-social behaviour. A key element has been to ensure surveillance of the street and public open space from the apartments. Refer to Section 7.15 of the EA for a detailed assessment of the proposal against the CPTED principles.

Visual privacy

Guidelines:

- *Maximise visual privacy between adjoining buildings by separation, setbacks and site layout.*
- *Design layouts to minimise direct overlooking of rooms and private open spaces.*
- *Use site and building design elements to increase privacy without compromising light and air access.*

Comment: As discussed above under Building Separation, the site layout, separation and setbacks will ensure adequate privacy. With regard the privacy in terms of the apartment layout, this does not form part of the Concept Application and will need to be considered in the future Project Application. The provision of building elements that have the ability to enhance privacy may also be considered with the more detailed design resolution to be undertaken at Project Application stage.

Building entry and Pedestrian access

Guidelines:

- *Improve presentation to street by entry treatment.*
- *Direct connection and clear transition between street and entry.*
- *Ensure equal access for all.*
- *Provide safe and secure access.*
- *Separate building entry from car parks.*

Comment: This application does not seek approval for the internal building layouts or apartment layouts. As such the treatment of buildings entries will be addressed in the future Project Application. However, the general siting and location of the buildings proposed with this concept plan ensure the guidelines can generally be achieved with the Project Application. The achievement of the following guidelines is demonstrated in the concept plan:

- Potential for ground floor apartments to be accessible from Albert Street and the proposed public open space.
- Locating main building entries on Albert Street and proposed public open space to activate the public domain.
- Separation of pedestrian and vehicle access.
- Main pedestrian entries are accessible from the basement.

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Vehicle access

Guidelines:

- *Ensure adequate separation between vehicle entries and street intersections.*
- *Optimise opportunities for active street frontages and streetscape design.*
- *Limit width of driveways to 6 metres.*
- *Locate vehicle entries away from pedestrian entries and on secondary frontages.*

Comment: The proposal consolidates the existing four vehicle access into the site by maintaining a single access/egress point along the southern boundary of the site. The access is less than 6m wide, is located more than 85 metres from the intersection of Pitt and Albert Street and is separated from pedestrian entries. The location of the driveway along the southern boundary minimises disruption to the proposed public open space on Pitt St.

2.4 Building configuration

Apartment layout and Apartment mix

Guidelines:

- *Single aspect apartments to have maximum depth of 8m from a window.*
- *Limit single aspect apartments to a depth of 8m from a window*
- *The back of the kitchen should be no more than 8m from a window.*
- *Cross over or cross through apartments greater than 15m deep to have minimum width of 4m.*
- *Determine apartment sizes in relation to location, market, spatial configuration and affordability.*
- *Ensure apartment layouts are resilient over time.*
- *Design layouts to respond to natural and built environments and optimise site opportunities.*
- *Avoid locating kitchen in circulation space.*
- *Include adequate storage in the apartment.*
- *Ensure apartments facilitate furniture removal and placement*
- *Provide variety of apartments in larger buildings.*
- *Refine appropriate mix by considering population trends and proximity to transport, employment and services.*
- *Locate a mix of 1 and 3 bedroom units on the ground floor to enable access by disabled, elderly and families.*
- *Optimise accessible and adaptable apartments.*

Comment: The number, mix and layout of apartments do not form part of this application, but will be the subject of a future Project Application. As such achievement of the above guidelines will be resolved at that stage. An indicative apartment layout for level 1 (Plan No.A013) and typical individual apartment layouts (Plan No. A014 and A015) have been prepared by Lippmann Associates to demonstrate that a mix of well-designed apartment types, layouts and sizes can be accommodated within the proposed building envelopes. A mix of apartments including: 1 bed; 1 bed + study; 2 bed; 3 bed; single and two storey/mezzanine could be provided to reflect the diverse social mix within the Redfern area and to attract a range of new households.

The typical apartment layouts (Plan No. A014 and A15) demonstrate that the apartment layouts can be designed to satisfy the above guidelines at Project Application stage

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Balconies

Guidelines:

- *Provide balconies primary balconies for all apartments with a minimum depth of 2m.*

Comment: While the internal building and apartment layouts do not form part of this application, the concept plans indicate that the envelope for each building can accommodate balconies with a minimum depth of 2m.

Ceiling heights

Guidelines:

- *Minimum floor to ceiling height of 2.7m for all habitable rooms and 2.4m is the preferred minimum height for non-habitable rooms.*

Comment: The final floor to ceiling height will be addressed in the Project Application. However, the building sections shown on Plan No. 010 indicate a height of 3.35m for the floor levels within each of the buildings. This demonstrates that a minimum floor to ceiling height of 2.7m can be achieved within the proposed building heights/envelopes.

Ground floor apartments

Guidelines:

- *Optimise the number of ground floor apartments with separate entries.*
- *Provide ground floor apartments with access to private open space, preferably as a terrace or garden.*

Comment: The concept plans indicate the potential to provide ground level apartments with separate entries within each of the buildings. There is also potential to provide private open space in the form of a courtyard/terrace for these apartments at ground level (building 2 and 4) or lower ground level (in the case of building 1 and 3). In some cases dual courtyards may be provided for individual apartments. The apartment layouts, including the design of ground floor apartments, will form part of the subsequent Project Application.

2.5 Building Amenity

Daylight access

Guidelines:

- *Orient building to optimise northern aspect.*
- *Optimise apartments receiving daylight access to habitable rooms and principal windows.*
- *Living rooms and private open space of at least 70% of apartments should receive 3 hours direct sunlight between 9am and 3pm in mid winter.*
- *Limit single aspect apartments with a southerly aspect to a maximum of 10% of total units.*
- *Ensure daylight access to communal open space March-September and shade in summer.*
- *Developments which seek to vary from the minimum standards must demonstrate how site constraints and orientation prohibit the achievement of these standards.*

Comment: The orientation of the development has been largely determined by the retention of key heritage elements, namely the northern elevation of Building 1 and the colonnade on the eastern elevation of Building 2. The retention of the existing landscaped forecourt along Pitt Street and its proposed dedication as public open space in accordance with the Redfern-Waterloo Built Environment Plan has also determined the location and orientation of buildings.

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Notwithstanding these constraints it is considered that the proposal optimises the northern orientation. This is evidenced by the principle elevations of Building 1 and 3 having a northern orientation. As these are the largest buildings within the proposal in terms of GFA, they will accommodate the largest number of apartments. This maximises the potential number of apartments with north-facing living areas and private open.

Sunlight angles have been included on the Building Sections Plan (No.A010) for the equinox, winter and summer solstice. For Buildings 1 and 3 the angles are projected at 12 noon and for Buildings 2 and 4 the angles are projected 9am and 3pm given these buildings have an east-west orientation. The majority of north facing apartments located within Building 1 and 3 are capable of receiving sunlight to the internal living areas and balconies for 3 hours between 9am and 3pm during winter. The sun angles for Buildings 2 and 4 also indicate that the elevations and internal areas of these buildings will receive morning and afternoon sunlight during midwinter.

While the building envelopes and orientation proposed with this application seek to optimise sunlight and daylight access, the amount of sunlight access that will be achieved to living areas and private open space will ultimately depend on the design and layout of apartments within each of the buildings proposed with the Project Application. For example, mezzanine apartments have the potential to increase sunlight access to living spaces of ground and lower levels. Accordingly, achievement of the above guidelines or variations to, will need to be considered with the future Project Application, having regard to the heritage, open space and other site constraints.

As outlined above, public open space is proposed in lieu of a large area of communal open space. Over 50% of the proposed public open space will receive solar access between 9am and 12 noon at winter ensuring a minimum of 3 hours of sunlight. During the Equinox Approximately 80% of the open space will receive solar access between 9am and 12pm and 50% will receive solar access between 12pm and 3pm.

Natural ventilation

Guidelines:

- *Utilise building layout and section to increase potential for natural ventilation.*
- *Building depths, which support natural ventilation range from 10-18m*
- *60% of units to be naturally cross ventilated.*
- *25% of kitchens to have access to natural ventilation.*
- *Developments, which seek to vary from the minimum standards, must demonstrate how natural ventilation can be satisfactorily achieved.*

Comment: As outlined previously, the apartment depth of each building (excluding balconies) is less than 18 metres and in this regard supports the potential for natural ventilation. Other guidelines relating to natural ventilation will be addressed in the Project Application with the resolution of the apartment layouts.

Acoustic privacy

Guidelines:

- *Maximise acoustic privacy by adequate separation.*

Comment: Acoustic privacy will be addressed in the Project Application through the design of the internal apartment layouts and common areas, selection of construction materials and the provision of design measures where required. Notwithstanding, it is considered that the location and separation of the buildings proposed with this Concept Application will achieve acoustic privacy.

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3 Analysis of Shadow Impacts

Shadow diagrams have been prepared by Lippmann Associates for the winter solstice, equinox and summer solstice. The diagrams show the shadow impacts at 9am, 12noon and 3pm in both plan and isometric form, with additional times shown in isometric detail where necessary.

An assessment of the shadow impacts is provided in Section 7.16 of the Environmental Assessment. Further detail and clarification of the overshadowing impacts is provided below in support of the initial assessment to demonstrate that the impacts on adjoining properties are minimal and considered to be acceptable.

The shadow impacts on surrounding properties is confined to the residential apartment development directly adjoining the southern and part of the western boundaries, known as 146-152 Pitt Street. The only other development to the west consists of an existing warehouse and a two storey brick cottage, both of which are built to the boundary. Residential development to the east is separated from the development site via Pitt Street.

Existing overshadowing of the apartments at 146-152 Pitt Street is largely caused by: the existing 5 storey building (Building 1) extending along the southern boundary of the development site; the apartment buildings overshadowing themselves; the grade separation between the development site and 146-152 Pitt Street and the grade separation between the eastern and western parts of 146-152 Pitt Street.

The configuration of the apartments is identified on the survey plans prepared by *Lockley Land Title Solutions* provided with the Concept Plan. A reduced copy of the survey plans is included in Appendix C of the Environmental Assessment. The adjacent apartments consist of:

- Two-three storey townhouse style apartments located along Pitt Street, St Peters Lane and part of the western and southern boundary shared with the development site.
- Five storey apartment building located on the southern part of the site with frontage to Phillip Street.
- Five-seven storey apartment building located on the north-eastern part of the site, directly to the south of Building 1 proposed on the development site.

The overshadowing impacts on the adjacent apartment for the summer solstice, winter solstice and equinox are summarised below. This summary should be read with reference to the shadow diagrams.

Summer solstice

At 9am there is a marginal increase in overshadowing of one of the two storey townhouse apartments to the west. However, by 12noon there is no additional overshadowing of the adjoining apartments and this remains the case up until 3pm.

Equinox

At 9am there is additional overshadowing to some of the two storey townhouse style apartments to the south and west of the development. The private open space is currently in shadow and the additional shadows primarily affect what appear to be first floor bedroom and bathroom windows.

By 12noon the apartments to the west are not affected by additional shadows. The additional overshadowing of the two storey townhouse style apartments to the south is confined to the ground level windows, which appear to consist of laundry windows and part of the roof.

At 3pm additional overshadowing over the adjacent apartment is minimal. There is additional overshadowing of the blank wall of the two storey townhouse apartments fronting Pitt Street and a small strip of the landscaping extending to the southern boundary of the development site.

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Winter Solstice

At 9am there is some additional overshadowing to the first floor bedroom and bathroom windows of the two storey townhouse apartments to the west. By 10am the additional overshadowing is restricted to the ground level windows and by 12pm there is no additional overshadowing of these apartments.

At 9am there is additional overshadowing to two windows on the northern elevation of the five – seven storey apartment building located directly to the south of Building 1 on the concept plan. These are not living room windows but appear to be bathroom windows. At 12pm there is some additional overshadowing of two balconies on the western elevation of this building, but by 1pm there is no additional overshadowing of the balconies. At 3pm the additional overshadowing is limited to what appear to be bedroom windows.

At 9am there is also some additional overshadowing of some of the balconies on the northern elevation of the five storey apartment building located further south, which has frontage to Phillip Street. However by 12 noon there is no additional overshadowing of this building and the northern elevation is predominantly in sunlight from 12 noon onwards.

While there is some additional overshadowing of the adjacent residential apartment development at 146-152 Pitt Street, it is considered to be minimal given only a small proportion of the apartments will be affected and in the majority of cases the overshadowing does not affect living areas and private open spaces but bedroom and bathroom/laundries.

With regard to overshadowing of the proposed public open space over 50% of the open space will receive solar access between 9am and 12 noon at winter ensuring a minimum of 3 hours of sunlight. During the Equinox Approximately 80% of the open space will receive solar access between 9am and 12pm and 50% will receive solar access between 12pm and 3pm.

Solar access to the apartments within the proposed development is outlined in the supplementary SEPP 65 assessment provided in Section 2.

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4 Archaeology

A preliminary archaeology assessment prepared by Archaeological & Heritage Management Solutions Pty Ltd (AHMS) was contained in Appendix K of the Environmental Assessment submitted with the Concept Plan. Section 7.2 of the Environmental Assessment summarised the findings and recommendations of the preliminary archaeology assessment.

The preliminary assessment indicated that a localised area of the development site contained relics, namely remnants of a well, associated with historic occupation considered to date to the period between the mid-Nineteenth Century and 1941. On the basis of the information reviewed for the preliminary assessment, the historic relics were assessed as having local heritage significance. However, the need for further targeted historical research was recommended to determine the age and significance of the relics, in particular whether there was an association between the well and the noted Colonial Surgeon, William Redfern. The preliminary assessment recommended this research be undertaken prior to the determination of the Concept Plan and that a revised statement of significance should be prepared for the site, taking into consideration any results obtained by the research.

In accordance with this recommendation, AHMS undertook further targeted historical research. The results of this research and significance assessment are presented in the enclosed Supplementary Archaeology Assessment and are summarised below:

1. No documentary evidence was found to suggest that structures were built on the subject land in the period prior to, or during William Redfern's tenure;
2. There is no documentary evidence to suggest that Redfern, or his heirs constructed any buildings (or any other forms of construction, including a well) on the subject land;
3. The naming of the historic building that once occupied the site 'Redfern Lodge' has resulted in speculation that this building was an ancillary structure associated with a larger residence occupied by Redfern. This speculation has resulted in an unsupported association between Redfern and the site;
4. The documentary evidence clearly indicates that Redfern Lodge was constructed on Redfern's former grant after 1842. The building was oriented to, and faced Pitt Street. This line of road was not created until after the failure to sell the Redfern Estate as a single property in February 1842, after which the Estate was subdivided into eight sections for sale;
5. Deposition of the relics in the basement of the former Hospital would have commenced between 1842 and 1865 and been added to progressively through until the early decades of the Twentieth Century;
6. The relics have archaeological potential to yield historically relevant information regarding occupation on the fringe of Sydney and development of the Redfern Grant. As such they are considered to be locally significant as outlined in the preliminary heritage assessment for their values in relation to the following assessment criteria:
 - (a) **History** - important in the course or pattern of NSW's cultural or natural history (or the cultural or natural history of the local area); and
 - (e) **Potential to yield information** – potential to contribute to an understanding of NSW's cultural or natural history (or the cultural or natural history of the local area).

Given the above research results, the significance assessment and management recommendations for the site presented in the initial archaeological assessment are considered to remain accurate. Accordingly the following recommendation is maintained with regard to the management of the relics during future development:

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The Statement of Commitments for the Concept Plan should include an undertaking to conduct the following work:

- 1. Preparation of an Aboriginal Heritage Impact Assessment (AHIA), in accordance with draft Department of Conservation Guidelines 1997;*
- 2. Integration of the statement of significance and the results of the AHIA within an Archaeological Management Plan for the site that considers (i) heritage interpretation of the archaeological site within the proposed development and/or (ii) archaeological excavation and documentation of the remaining portions of the historic site prior to construction.*

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5 Social and Economic Impacts

The Director General Requirements identify the following social and economic impacts as key issues to be addressed in the Environmental Assessment.

Identify cultural, social and residential opportunities that will be provided to support the development of a sustainable community within the broader Redfern-Waterloo area. Address social impacts of the proposal.

The Plan must address long term social sustainability issues and address impacts on community safety, the local community impacts, and measures to ensure the minimisation of crime and anti-social behaviour.

Address impacts on Aboriginal and European community within Redfern.

Further to the assessment provided in Section 7.18 of the EA, the proposed development is not expected to result in any adverse social or economic impacts but will deliver a number of benefits as discussed below:

Increase housing choice

The proposal will provide increased residential and housing opportunities within Redfern. The proposed density could accommodate approximately 150 dwellings. The design of the development is capable of accommodating a mix of dwelling sizes, types and layout. The mix of dwelling types will increase housing choice for the existing residents within the area but also provides the opportunity to attract a greater diversity of household types. Increasing the diversity of the population demographic is important for achieving and maintaining sustainable communities.

The proposed development will increase housing choice within Redfern and create additional housing within an established urban area that has good access to transport, services and employment locally and within the CBD. It will enable residents to live and work within acceptable commuting distances, positively contributing to family life and a reduction in greenhouse emissions.

Affordable housing

Affordable housing contributions will be levied on the development in accordance with the Redfern - Waterloo Affordable Housing Contributions Plan 2006. The contributions will go towards the provision of affordable housing within the Redfern-Waterloo Operation Area for very low, low and moderate income earners in the area.

Safety and security

As outlined in Section 7.15 of the Environmental Assessment (EA) the safety and security of the site and adjacent public domain for future occupants and the wider community has been considered in the design of the proposal. The principles of *Crime Prevention Through Environmental Design (CPTED)* have been taken into consideration in the design of buildings, open space and landscaping to maximise community safety and minimise crime and anti-social behaviour. A key element has been to ensure surveillance of the street and public open space from the apartments. Refer to Section 7.15 of the EA for a detailed assessment of the proposal against the following principles of CPTED: surveillance; access control; territorial reinforcement and space management.

Community facilities

The redevelopment of the former Rachel Forster Hospital site does result in the loss of any community facilities, but will provide significance community benefits as outlined below:

- The site has not been used as a hospital since its closure in 2000, when the remaining hospital facilities and staff were transferred to Prince Alfred Hospital, Camperdown. Accordingly, the proposal does not result in the reduction of existing hospital services.

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- Proceeds from the sale of the development site with a Concept approval in place, will fund the development of a new community health centre at the former Redfern Courthouse and Police station site located at 103 - 105 Redfern Street. The new health centre will provide a range of health services including: community nursing and post acute care services; counselling; Aboriginal health; drug health services and mental health services. The services will be provided to the local community within the centre and through outreach services. The services will provide improved health and social opportunities for the local community, and assist in the development of a sustainable community within the Redfern area.
- The community health centre currently operating from the existing building on the site fronting Albert Street will be relocated to the new facility on Redfern Street.
- Contributions will be levied on the development in accordance with the Redfern - Waterloo Contributions Plan 2006. The Contributions Plan provides for a new child care centre and numerous public domain and recreation facilities.

Public Open Space

The proposal provides for approximately 1060m² of proposed public open space, directly accessed from Pitt St, which will be available for use by the local community.

Heritage, culture and archaeology

The historical, social and aesthetic importance of the former Rachel Forster Hospital will be respected and protected through the proposed design of the development, adaptive reuse and preservation of proposed open space. This will ensure its significance will be retained for future generations.

With regard to Aboriginal cultural heritage, the Preliminary Archaeology Assessment undertaken by Archaeological & Heritage Management Solutions Pty Ltd (AHMS) contained in Appendix K of the Environmental Assessment provided an assessment of Aboriginal cultural heritage. The assessment indicated that the localised remnant soil landscape immediately below the historic relics (namely the well) and the existing driveway/forecourt area has the potential to contain Aboriginal sites and/or objects. Although the probability of such a limited area containing Aboriginal sites is considered to be low, the assessment indicated that the significance of any Aboriginal sites and/or objects within this area cannot be determined without further archaeological investigation. Accordingly, the Draft Statement of Commitments includes an undertaking to prepare an Aboriginal Heritage Impact Assessment (AHIA) in accordance with the draft Department of Heritage Conservation Guidelines.

Stimulus to the local economy

The development will attract new population to the area as well provide additional housing opportunities for existing residents. The additional population generated by the proposed development may reasonably be expected to improve expenditure within the Redfern area with the increase in income from new residents and their visitors patronising existing and future businesses. The increased household expenditure will have multiplier effects which will make a positive contribution to the local economy.

Diversification of the community and economy

Increasing the local population provides the potential to create a population with a more diverse demographic. New arrivals are expected to make a positive contribution to the local community and economy through consuming or providing goods and services.

Utilise existing resources

Limited economic value is currently provided from the site to the local community as it is primarily vacant. The proposal provides for the redevelopment of an underutilised, degraded land parcel within an existing urban area for quality housing and public open space.

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Employment

The proposal will create additional short and medium term employment opportunities in the local area during the construction phase. There is also the potential for some indirect employment generation as a result of the additional population within the retail and service industries, such as restaurants/cafes.

The potential for job creation within the local area is a key component of developing a sustainable community within the Redfern area.

Impacts on the community

The proposed will not impact on the Aboriginal, European or wider community within Redfern. As outlined above the proposal will provide benefits for the entire community through the provision of public open space; funding for a new community health centre; job creation; increased housing choice.

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6 Conclusion

This information has been provided in support of the Concept Plan Application for the redevelopment of the former Rachel Forster Hospital site at Redfern. The information supplements the Environmental Assessment prepared by SJB Planning and supporting information submitted with the Concept Plan Application to the Department of Planning on 29 June 2007.

The information submitted with the Concept Plan Application, together with this supplementary submission addresses the Environmental Assessment requirements issued by the Director General for Planning. The information demonstrates that the proposal will not have any significant adverse environmental impacts, will provide important community and social benefits and is consistent with the relevant statutory and non-statutory policies. Accordingly, the proposal is considered to be suitable for the site and in the public interest.

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