



Contact: Kate MacDonald
Phone: 02 9228 6435
Fax: 02 9228 6399
Email: kate.macdonald@planning.nsw.gov.au
Our ref: MP 11_0046

Mr Walter Gordon
Manager Planning and Development
Meriton Apartments Pty Limited
Level 11 Meriton Tower, 528 Kent Street
SYDNEY NSW 2000

Dear Mr Gordon,

RE: ENVIRONMENTAL ASSESSMENT FOR MP 11_0046 - STAGE 3, 61 MOBBS LANE, EPPING.

I refer to the Environmental Assessment (EA) for the project mentioned above that was publicly exhibited between 10 October 2012 and 9 November 2012.

The department has reviewed the Environmental Assessment (EA) for the project and wishes to advise that there are numerous concerns with the adequacy of the plans, the level of amenity for a number of residential apartments, the internal layout of the car park, access arrangements for the gym and pool facilities, potential fire safety issues and the lack of information in relation to existing, approved and proposed levels on site. The department's specific concerns are identified in **Attachment A**.

To date, the department has received a submission from Sydney Water, Transport for NSW and the Office of Environment and Heritage. In addition, seven submissions were received from the general public. Copies of these submissions are provided at **Attachment B**. The department notes that Parramatta City Council, Endeavour Energy and Roads and Maritime Services will be providing a response by Friday 14 December 2012. The department will forward you a copy of these submissions as soon as they are available.

It is requested that you provide a response to all issues identified in Attachments A and B, as well as the remaining submissions from Parramatta City Council, Endeavour Energy and Roads and Maritime Services at your earliest convenience.

Should you have any enquires relating to this matter, please contact Kate MacDonald on 9228 6435 or via email to kate.macdonald@planning.nsw.gov.au.

Yours sincerely,

Heather Warton 26/11/12.
Director
Metropolitan & Regional Projects North

ATTACHMENT A

1. Adequacy of Plans

The plans as submitted are inadequate and provide insufficient information/inaccurate information. The following inadequacies need to be addressed and additional information needs to be provided:

- a. The plans as submitted are not sufficiently clear to allow assessment as some prints are almost completely black, some elevations cannot be read as they are shown in shadow, many of the dimensions cannot be read as they are too small and the printing is of substandard quality which prevents an understanding of the location of openings on the floor plans.
- b. The balcony sizes are shown on some floor plans but not on others. Also the depth of the balconies should be dimensioned.
- c. Some of the elevations do not appear to match the floor plans and it appears they are incorrectly labeled.
- d. No plans are provided which show the site as a whole to understand the interrelationship between the buildings and the basement parking.
- e. No elevations are provided which show the interrelationship between the buildings and the topography of the site. As a minimum an elevation as viewed from Mobbs Lane, the south-west boundary, the north-west boundary and the internal road should be provided.
- f. No plans have been provided that show the finished levels and treatment of the podium areas.
- g. A section should be provided through buildings 11 and 15/6 and another through buildings 12 and 13/14 to allow an understanding the how the parking, podiums, buildings and topography relate. These sections are to identify the original ground level (prior to any early works) and the finished ground level after the early works.
- h. A comprehensive concept landscape plan is to be provided for the grounds and podiums of Stage 3. This concept plan is to identify:
 - i) existing vegetation to be retained,
 - ii) planted areas and their treatments,
 - iii) pathways between buildings,
 - iv) pathways to the footpath and within the landscaped areas,
 - v) locations for street furniture,
 - vi) delineations between private, communal and publicly accessible open space;
 - vii) provide area calculations for publicly accessible open space;
 - viii) provide a typical species selection; and
 - ix) show the interrelationship with the approved landscaping on the other stages.

2. Amenity

The design of the buildings does not afford a suitable level of amenity for several apartments and should be amended to provide for a suitable level of amenity as required by the Residential Flat Design Code. The following concerns are raised, together with examples of the concerns, but the list is not exhaustive and it is recommended that the layout of each unit be considered individually having regard to the following concerns. Such an exercise is likely to significantly improve the amenity of dwellings within the development.

- a) It is considered that balconies for 2 and 3 bedroom dwellings should be capable of accommodating a table and four chairs and as such need to be increased in depth to 2.5m and should be a minimum of area 10m². Balconies off 1 bedroom units should be able to accommodate a small table and 2 chairs and should be a minimum depth of 2m and a minimum area of 8m². This has not been provided with the current design which does not appear to provide any correlation between the number of bedrooms and the size of the balcony. Examples of this are Unit 209 in Building 12 which is a 2 bedroom unit but has a balcony of only 7.3m² and Unit G21 in building 13/14 which is a 2 bedroom unit but has a balcony of only 1.6m depth (scaled from the plans).
- b) Some of the rooms to side elevations of buildings are not provided with appropriate cross ventilation and solar access that would be afforded by windows and/or balconies in those elevations, which make these units have a lower level of amenity than is necessary. I note that assessing this was very difficult due to the poor quality of the plan printing. An example of this is found in the east elevation of Building 11, where several units, including Unit 406 could have east facing windows off the living/dining room which would also afford good views. Another example is Unit 407 in Building 11 which does have a highlight window, which would preclude an opportunity for views and provides a south facing balcony, rather than one off the east elevation.
- c) The internal layout of the apartment building in some cases is far from ideal, with the living room of one unit next to bedroom of another unit, which lessens the amenity of the unit by leading to potential future noise issues. An example of this is found between Units 118 and 119 in Building 15/16, which could easily be corrected by a redesign, which would also result in the living space of Unit 119 having a more favourable north-east dual aspect.
- d) The layout of units has not maximized the potential to have north facing living rooms. An example of this is Unit 204 in Building 13/14 which has a northerly aspect for the kitchen and bathroom and a southerly aspect for the balcony and living room. A second example is Unit 220 in the same building where a southerly aspect is provided where an easterly aspect is possible.
- e) The layout of a number of apartments inappropriately provide laundries on the outside wall with the kitchen adjacent, removing opportunities for natural light and ventilation to the kitchen and pleasant views, rather giving them to the laundry. An example of this is Unit 307 within Building 11.
- f) The layout of the 5th level of Building 13/14 is unacceptable, with north facing common hallways rather than balconies and living room. This is in direct contrast to the well designed 5th level of Building 15/16 which provides for north facing living rooms and balconies.
- g) Building 13/14 contains the lift cores on the northern elevation which does not maximize the provision of either views from the units or northerly solar access.

- h) Inadequate privacy is provided in several instances between balconies and windows or window and windows in differing units/lobbies. An example of this is in Building 13/14 between the balcony of Unit 120 and the lobby and between the lobby and living room of Unit 105.
- i) The layout of Level 3 in Building 17 wastes the opportunity to use the roof of the level below as terraces for the units.
- j) Concern is raised that the raised podium would allow overlooking of the ground floor units' courtyards. An example of this is in Building 11, the ground level of which appears to be below the podium level.
- k) It appears that the adaptable units are all 2 bedroom units. A mixture of unit sizes needs to be provided.

3. Car Parking

Concern is raised that the basement servicing Buildings 11-16 is too large and will result in the following problems in operation;

- a. The size of the basement to be served by only 1 internal ramp and 1 exit driveway is likely lead to congestion and queuing at the ramps and at the exit driveway in peak use periods such as morning peak hour.
- b. The proximity of the internal ramp to the exit ramp is likely to lead to conflict if cars are queuing to exit the driveway which would prevent users at the lower level from using the ramp.
- c. The use of such a large basement with only one entrance and exit would lead to confusion for visitors who would have difficulty finding both the visitor parking spaces and the correct lift core to access the building desired.
- d. The length and number of dead-end access aisles within the basement is inappropriate, particularly where visitor spaces are located in the dead-end aisle and is likely to lead to cars having to reverse back along the aisle if the visitor spaces are occupied. An example of this is the visitor spaces in proximity to Lobby 16.
- e. The number of tandem parking spaces is excessive and indicative of a poor car park layout.
- f. The location of wash bays adjacent to resident spaces is inappropriate as the cars parked in the adjacent spaces are likely to be frequently splashed by water from the car washing process. These spaces should be adjacent to visitor spaces.
- g. Concern is raised that the large combined basement under numerous buildings may raise fire separation issues under the BCA and a report addressing this is requested.
- h. Concern is raised that the layout may not satisfy the fire egress requirements under the BCA and a report addressing this is requested.
- i. The traffic statement is very limited in its address of whether the basement layout is appropriate, particularly in terms of the above points and a report addressing this is requested.
- j. The traffic statement and the access report indicate the car park does not comply with the relevant Australian Standards. The car park should be redesigned to comply.
- k. There appears to be very limited storage in the basement and more information is required in relation to compliance with the storage areas detailed in the Residential Flat Design Code.
- l. The waste management plan and traffic report identify different methods of waste removal and also are unclear on the provision of loading facilities for removalist vans.

Clarification of both issues is sought and details are to be provided by the traffic engineer as to the maximum size of truck that can access the loading dock, whether it is suitable for access by garbage trucks and whether the location of the dock adjacent to the only internal ramp and the only access point to the basement is appropriate or is likely to result in conflict and delays.

- m. Accessibility into some of the spaces appears problematic. An example of this is the visitor space located adjacent to the entrance ramp and next to the bike storage.

4. Levels

Inadequate information is provided to allow an assessment of the proposed height of the buildings, particularly in relation to how far above natural and finished ground levels the podiums will be and how they will be treated.

5. Access to Amenities

The access to the shared pool/gym facility is not clear. This facility appears only to be accessible from the car park or via Lobby 14. It is not appropriate that all residents access this facility through that lobby or that the only alternative access is via the car park. Access should be provided from communal space and from ground level.