

Your Reference: MP 11_0048
Our Reference: NCA/5/2011
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Director, Urban Assessments
Department of Planning
GPO Box 39
Sydney NSW 2001

Attention: Enguang Lee

14 September 2011

Dear Mr Lee,

**Major Project 11_0048 – Residential Development – Buildings 6, 9, 10 & 17
61 Mobbs Lane - Epping - Channel 7 Site (Epping Park)**

I refer to the public exhibition of the above Major Project seeking approval for the construction of Buildings 6, 9, 10 and 17 (Stage 2 Residential Development). Please be advised that Council raises issues with the proposed development with respect to compliance with the height controls within the approved Concept Plan, streetscape and design, landscaping and parking. These issues are addressed within this submission.

Urban Design

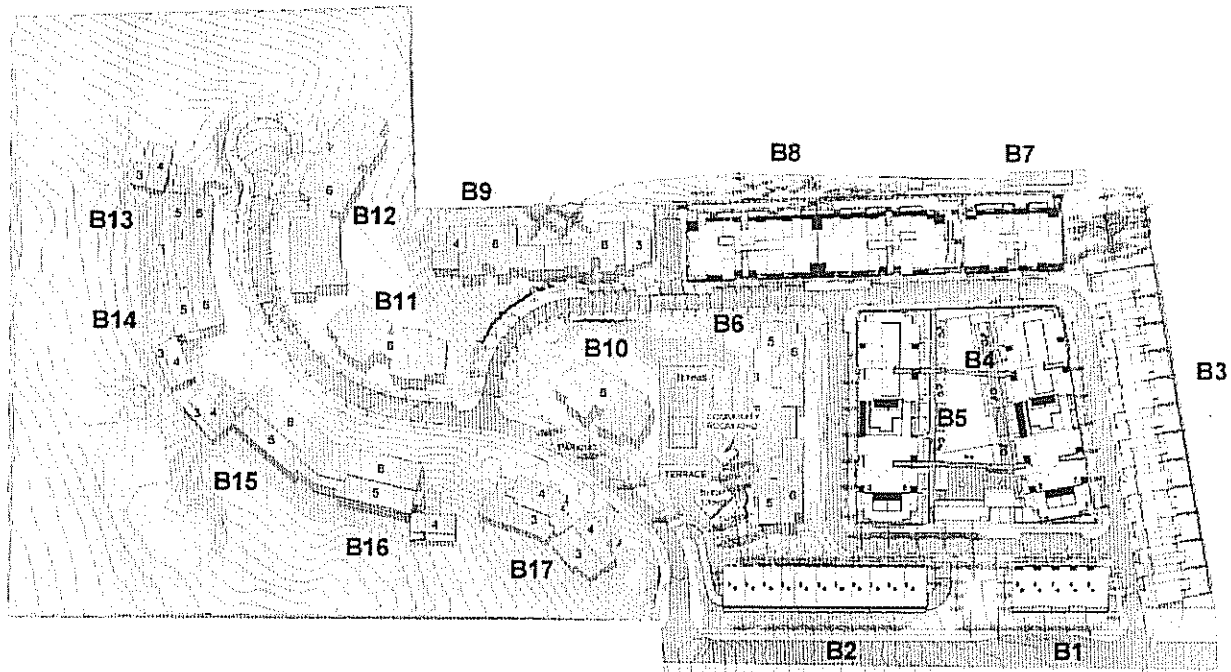
Approved Concept Plan Review (MP 05_0086)

The proposal generally complies with the Concept Plan for the site (MP 05_0086) which was approved by the Department of Planning on 22 August 2006 and amended on 21 February 2011. However, concern is raised with the height of Buildings 6, 9 and 17 and whether they comply with the height restrictions contained within the Concept Plan.

The concept plan limited the height to 6 storeys. Condition A1 (5) of the modified Concept Plan approval states the following:

A maximum height number of 6 storeys and height distribution in accordance with figure 8.9 of the preferred project report dated May 2006, as amended by the 'Preferred Project Report' dated December 2010, prepared by Architectus (note 7 storey buildings are not permitted on this site).

The approved height distribution is shown in the plan below.



Plan View

Concern is raised with the height of Buildings 6, 9 and 17 and whether they comply with the height restrictions contained within the Concept Plan. It is difficult to properly assess the heights as no natural ground levels have been provided on the plans and the levels on the submitted survey cannot be ascertained. The comments are therefore based upon the architectural elevations and sections provided.

(a) Building 6

The approved height distribution of Building 6 indicates a 6 storey element on the northern elevation and a 5 storey element on the southern elevation. The plans submitted do not indicate the stepping of these storeys.

In addition, Section 1 (Drawing No. A0630 Rev E) and the south-western elevation (Drawing No. A0620 Rev E) both indicate that the building is 7 storeys in height. This appears to include the pool and gymnasium (Parking Level 1) and the 6 levels of residential located above.

This proposed height does not comply with the approved modified Concept Plan.

(b) Building 9

The approved height distribution of Building 9 indicates a 6 storey building with a 3 storey element to the north-east and a 4 storey element to the south-west. The plans submitted do not indicate the correct stepping of these storeys as the building is partially 5 storeys to the north-east and partially 6 storeys to the south-west.

In addition, concern is raised with the significant projection of the basement - Carpark Level 1 as shown on Section A (Drawing No. A0930). This basement appears as a storey and results in a building which is 7 storeys in height.

This proposed height does not comply with the approved modified Concept Plan.

(c) Building 17

The approved height distribution of Building 17 indicates 3 storeys facing the Mobbs Lane frontage with 4 storeys at the rear. The 3rd storey element is to wrap around to the west however appears as a 4 storey element on the submitted architectural plans.

This proposed height does not comply with the approved modified Concept Plan.

Despite a 6 storey height limit being approved within the concept plan, Council does not support the construction of 6 storey buildings on this site.

State Environmental Planning Policy No. 65 notes that *'good design provides an appropriate scale in terms of the bulk and height that suits the scale of the street and the surrounding buildings'*

Council's previous submissions regarding the redevelopment of this site have noted that the overall scale of the proposal is of concern as there is a distinct contrast with existing development in the area. The residential flat buildings containing 6 storeys are considered inappropriate in scale for this location. The development proposed in its current form is likely to over dominate the context within which it is located. As a result, concern is raised that the proposal in its current form will set an undesirable precedent for future development in the Parramatta local government area.

It is also noted that the 6 storey buildings are not located within a 10 minute walking distance from either of the two stations in the vicinity neither are they near a major urban attractor such as a town centre or shops. This is counter to the strategy proposed by the Department of Planning, Parramatta Council and general good transport and land use planning practice of concentrating increased density in town centres and around transport nodes to reduce car travel, improve convenience and increase the city's social, environmental and economic sustainability.

Streetscape & Design Review

(a) Building 6

➤ **Internal Layout**

In drawing A0614, the apartments adjacent to the lift cores require changes to the layout to allow access to both bedrooms. There is currently no access to the master bedrooms.

➤ **Natural Ventilation**

It is noted that some, but not all single aspect 2 bedroom apartments have windows to the toilets on the external walls. All toilets along external walls should have operable windows for natural ventilation.

(b) Building 9

➤ **Streetscape**

The proposal results in a poor streetscape interface with a large amount of blank wall at street level. Additionally, Section E in Drawing A0933 does not appear to match the information shown in the South Elevation of drawing A0920, which shows a much greater difference (almost twice) between the first floor and street level. It is recommended that the building levels are lowered (i.e. a deeper basement) so that the ground floor of the eastern edge of the building is level with the street. This would allow greater passive surveillance opportunities and reduced areas of blank wall at street level, improving the presentation to the street.

➤ **Natural Ventilation**

All toilets along external walls should have operable windows for natural ventilation. This is particularly important for single aspect apartments. All kitchens along external walls should also have operable windows for natural ventilation, particularly the corner apartments at the eastern end of the building.

➤ **Ground Floor**

The blade walls bisecting the private open space of apartments G01 and G02 should be removed, or reduced in length if possible to improve the amenity of the living spaces.

(c) Building 10

➤ **Blank Facade**

Concern is raised with the amount of blank walls on the façade, which may benefit from openings / windows to break up the multi storey flat vertical surface.

(d) Building 17

➤ **Access Corridor / Lift**

Each level has 10 apartments accessed from a single access corridor / lift, which exceeds the SEPP 65 recommended maximum of 8 apartments.

➤ **Topography**

Building 17 would have an improved response to the topography of the site if it were 2 separate buildings that were stepped in relation to the slope.

➤ **Façade**

The strong vertical emphasis and lack of horizontal datums of the façade results in a façade that appears quite flat in parts. A more balanced composition of both vertical and horizontal elements may reduce the apparent scale of the building when viewed from the street.

Accessibility

It is noted that the proposed development provides adaptable dwellings and access for people with disabilities to the ground floor of all residential buildings. Access for people with disabilities from the public domain and car parking areas to the tennis court and café/shop are to be provided. Consideration must be given to the means of dignified and equitable access from public places to these facilities. Compliant access provisions for people with disabilities shall be clearly shown on the plans submitted with the Construction Certificate. All details should be prepared in consideration of, and construction completed to achieve compliance with the Building Code of Australia Part D3 "Access for People with Disabilities", provisions of the Disability Discrimination Act 1995, and the relevant provisions of AS1428.1 (2001) and AS1428.4.

Landscaping

One of the objectives of the proposed planting strategies is to re-introduce endemic Blue Gum High Forrest species (BGHF). However, the amount of BGHF species contained within the indicative plant schedule (as shown on the plan) is limited and does not include any canopy trees such as Sydney Blue Gum (*Eucalyptus saligna*), Grey Ironbark (*Eucalyptus paniculata*), Sydney Red Gum (*Angophora costata*), Narrow-leaved Apple (*Angophora floribunda*) etc which are all endemic canopy trees. It is recommended that the landscape plans incorporate larger growing endemic canopy trees within the open areas such as the areas surrounding Building 17 to improve upon the urban canopy as the indicative plant schedule (as shown on the plans) only allows for small trees up to 10m tall.

Any street tree plantings within the Mobbs lane frontage be undertaken in consultation with Councils Open Space and Natural Resource team to discuss appropriate treatments to the public domain.

Traffic & Parking

The proposed development provides for a total of 326 parking spaces and 75 bicycle spaces.

Parking Requirements

Council's DCP 2005 specifies the following parking rates (for residential development not within 400m walking distance of railway station or transport corridor):

- 1 x 1 bedroom (14 units) = 14 spaces
- 1.25 x 2 bedroom (203 units) = 253.75 (254) spaces
- 1.5 x 3 bedroom (4 units) = 5.5 (6) spaces
- Plus 0.25 space per dwelling for visitor parking (221 units) = 55.25 (56) spaces

- 1 bicycle space per 3 dwellings = 73.66 (say 74) bicycle spaces

Total parking requirements = 330 spaces (including 56 spaces for visitors)
plus 74 bicycle spaces

Parking Provision & Layout

The number of parking spaces provided on-site for buildings 6, 9, 10 and 17 (326 spaces) is deficient by 4 spaces in accordance with Council's DCP 2005. Parking should be modified to comply with the minimum car parking spaces required under Council's DCP2005.

The dimensions and configuration of the disabled parking spaces in the basement levels for Buildings 6,9,10 and 17, as shown on the submitted plans, do not comply with AS 2890.6-2009 and should be modified accordingly. Note that dimensions and configuration of "adaptable spaces" should be the same as "disabled parking spaces" in accordance with AS 2890.6-2009.

All stacked parking spaces provided in the basement levels for all building apartments should only be used by the same tenant/owner.

Conclusion

Council strongly opposes the proposed heights of Buildings 6, 9 and 10. Notwithstanding that Council opposes the approved 6 storey height, it appears that Buildings 6 and 9 do not comply with the approved modified Concept Plan and are in fact 7 storeys in height. Concern is also raised that the design of the buildings has not fully incorporated the steeping of the height in accordance with the height distribution approved with the modified Concept Plan.

Notwithstanding the above, and should the Department be of the mind to approve the height within the application, it is considered that the proposed development should be amended to comply with the approved modified Concept Plan and concerns raised within this submission.

In addition, Council also requests that the traffic lights at the corner of Marsden Road and Mobbs Lane be installed as a matter of urgency.

Council appreciates the opportunity to comment on the above application and looks forward to further consultation on this matter.

Should you wish to discuss any of the above matters, please contact Council's Senior Development Assessment Officer, Kate Lafferty on 9806 5393.

Yours sincerely



Dr. Robert Lang
Chief Executive Officer
Parramatta City Council