Attachment B

Part 1 - Comments on the Design Guidelines (Appendix G)

1. Design Guidelines

The below advice focusing on the Design Guidelines document submitted as part of the RTS should be read in conjunction with Attachment A.

It is noted that Council does not support the Design Guidelines to guide future development applications in the Concept Area and that the Telopea Master Plan and the controls contained in the Parramatta DCP 2011– Telopea Precinct are the appropriate design control documents.

1.1 General Comments

- The guidelines should define whether the controls relate to the Core or the Precincts. The terminology 'core' and 'non-core' is too ambiguous, with the latter being used to identify the lower-scale areas of the Core as well as the Precincts
- The Concept Plans do not currently comply with several of these design guidelines, for example Sections shown in Appendix E do not comply with the requirements at 1.1 Provision 2 (page 260).
- The Guidelines should be in line with (or superseded by) Section 4.1.11 Parramatta DCP 2011- Telopea Precinct.

1.2 Building setbacks, massing and articulation

- Objective A – Could be elaborated to include a focus on maximising solar access, sightlines and view corridors at street level (rather than just focusing on building occupant amenity). It should also be stated that solar access should be protected, especially to surrounding existing open spaces and schools.
- There should be an objective related to taller buildings as per our DCP (4.3.9.2, O.2)
- Objective B – include the retention and protection of existing trees
- Maximum building length:
    - Specify that tower/podium buildings may not exceed 50 metres in length, measured from the longest side. Podiums which contain retail and community uses may exceed this length, with proper architectural articulation.
    - Specify that perimeter buildings may not exceed 50 metres in length. If it does exceed 50m it should either be broken into two sections or provide architectural articulation or breaks.
- The maximum floorplates for residential buildings is 1,000sqm. The floorplate must be measured to the outside face of the building including balconies, vertical and horizontal circulation, internal voids and external walls.
- Provision 4 – Setbacks measured to the face of the building is acceptable, add '*maximum balcony projection into the setback space is 400mm*.'
- Provision 4 – front and rear setbacks must be free of basement car parking under (basement car parking is to be kept within the building footprint)
- Provision 6 – Side setbacks generally not supported. Refer below setbacks for each The Core and Precincts.
- Controls that should be included:
    - Maximum residential floorplate area (1000sqm)
    - Maximum building depth
    - Basement car parking confined to building floorplates.
    - Front and rear setbacks are not to be burdened with basement car parking under.
    - Minimum lot dimensions to accommodate a residential flat building within the Precincts.
- Recommended Setbacks
    - The Core :

        - Buildings that are of a podium and tower form, should provide a street wall of between 2 and 4 storeys, with a tower setback of between 3 metres and 6 metres.
        - Upper levels of buildings should not extend over lower levels
        - Street setbacks nominated in the Guidelines are generally not supported. Ground (street) level setbacks should be:
            a) Between 0 metres to 3 metres for activated street frontage with retail or commercial uses; or
            b) Between 3 metres and 6 metres (or greater) where residential uses are at ground level to allow for landscaping and the protection of significant trees.
            c) The setbacks are measured to the face of the building.
    - Precincts:
        - Development of a residential flat building should have a minimum site frontage of 24 metres, except 18 metres for sites with two street or lane frontages.
        - New development must provide between a 4 to 6 metre setback to the street.
        - 0m side setback is not supported at this time as it relates to the Isolated Sites Study and this has not been deemed an appropriate redevelopment option. Side setback control should align with DCP for the Precincts, as follows:
            - The minimum setback to the side boundaries is 3 metres for part of the length of the building. Where apartments habitable rooms only face the side boundary, allow a 6-metre-wide side setback,
        - Rear setback controls assist with creating a deep soil zone and preservation of trees, as follows:
            - The rear setback is to be a minimum of 10 metres or 15% of the total length of the site as measured from centre of the rear boundary (whichever is the greater), as shown in Figure 4. The setback can be averaged to align with the building footprint where the rear alignment is not regular.
        - Street wall heights and corresponding setbacks should be provided for the Precincts as per Table 4.3.9.3 within the Telopea DCP.

1.3 Ground level interface

- The Core - The ground floor of buildings used for retail and/or commercial use are to have a minimum floor to ceiling height of 4.2 metres. All retail and commercial floors above the ground floor are to have a minimum floor to ceiling height of 3.3 metres
- Provision 6 – Apartments can be located below the street level, where it demonstrated that they cannot be located at street level due to the slope of the land. If located below street level the following applies:
    a) Adequate solar access to habitable rooms and balconies is demonstrated;
    b) The distance of the apartment front wall is a minimum of 5 metres from the street boundary or adequate privacy screening and landscaping is demonstrated;
    c) the FFL of the lowest apartment is not more than 1500mm below the level of the street; and
    d) The minimum floor to floor height of 3.3 metres, with a minimum floor to ceiling height of 2.9 metres and the head height of the windows is not less than 300mm from the underside of the slab above for ground floor and level 1 apartments.
- Further conditions for below ground level apartments to include:
    - No southern orientation
    - Not adjacent to a public road which is an over land flow path
    - Not shown on any approved flood maps or Water Management Strategy as being in a flood zone or in a floodway

- Not more than 1000mm below ground level

- Provision 6 – Floor to Floor height should be 3.3 m (not 3.1m)

1.4 Rooftops

- Objective A – delete the words '*residential accommodation'*.

1.6 Adaptable and Universal Design

- Provision 1 – 85 % of social housing should incorporate the Liveable Housing Guidelines gold level universal desgin features.
- Provision 2 – Council requires 15% of market dwellings to incorporate the adaptable housing requirements of AS4299 Class C. This ratio complies with Council current recommendations for the harmonisation (review) of DCPs.

1.7 Pedestrian Links

- Provision 5 – any proposed mechanical transportation is not permitted to be located in Council land.
- Provision 1, 2 and 3 – The applicant has not demonstrated that an acceptable access thoroughfare meeting the nominated objectives can be reasonably accommodated in the nominated corridor. A solution that does not rely on numerous switch back ramps is sought for this key pedestrian link. An indicative desgin drawings showing proposed building entry interfaces and a site sections through this link are required before these provisions can be confidently applied.

1.8 Public and Communal Open Space

- Provision 5 – Not acceptable. Please amend text to '*Public Domain Alignment Plans are to be provided for all new development in accordance with the requirements of the Parramatta Public Domain Guidelines.*
- Deep soil zones: Recommended controls for within the Precincts:
    - Deep soil should be designed to create a contiguous deep soil network formed with adjacent lots.
    - Provide a minimum of 30% of deep soil zone on the site area, with the following requirements:
        a) A minimum of half of the total deep soil area is located at the rear of the site.
        b) A minimum of 7% of the total site area which is provided as deep soil area shall be designed to have a minimum dimensions of 6 metres (or greater). The remaining deep soil areas shall provide minimum dimensions of 4 metres (or greater). Noting that a deep soil with a minimum dimension of less than 4 metres does not contribute to the deep soil calculation.
- Trees: Proposed controls inadequate. Recommended controls for both The Core and Precincts – as per DCP.

Section 3 – Transport and Parking

- Car parking rates and provision of EV infrastructure as per Council' Parramatta DCP – Telopea Precinct.

Section 4 – Sustainability

- Refer Council's Parramatta DCP – Telopea Precinct in relation to urban heat controls, dual piping, WSUD.

Section 5 – Design Excellence

- Is not in accordance with the provisions of Parramatta LEP 2011 and Council does not support.

Part 2: Urban Design Testing Precincts

The following urban testing should be reviewed in conjunction with Attachment B (Appendix 1 -Urban Design Analysis) as part of Council's original submission.

TREE RETENTION + DEEP SOIL COMPARISON

Figure 01 - LAHC CONCEPT PLAN

TREE RETENTION

	N5 SITE:	***N4 SITE:***
TREES RETAINED	12	20
TREES REMOVED	28	2

DEEP SOIL

	N5 SITE:	***N4 SITE:***
6M WIDE	842m²	580m²
4 M WIDE	297m²	218m²
TOTAL %	24%	29%

Issues/Constraints:

- Front setback of 3m is not compliant. A minimum 4-6m setback should be provided. Minimised front setback would require higher retaining walls to mitigate topography instead of landscape grading.
- Footprints for basements have not been provided so the extent of basement has been assumed. Due to the size and density of the buildings we expect the basement to realistically expand into the deep soil zones that the proponent has allocated.

LEGEND

	CONSOLIDATION		DEEP SOIL (4M)
	PROSUMED AMALGAMATION		TREE RETAINED
	DEEP SOIL (6M)		TREE REMOVED

Figure 02 - Indicative Application of the DCP of Telopea

TREE RETENTION

	N5 SITE:	***N4 SITE:***
TREES RETAINED	19	20
TREES REMOVED	21	2

DEEP SOIL

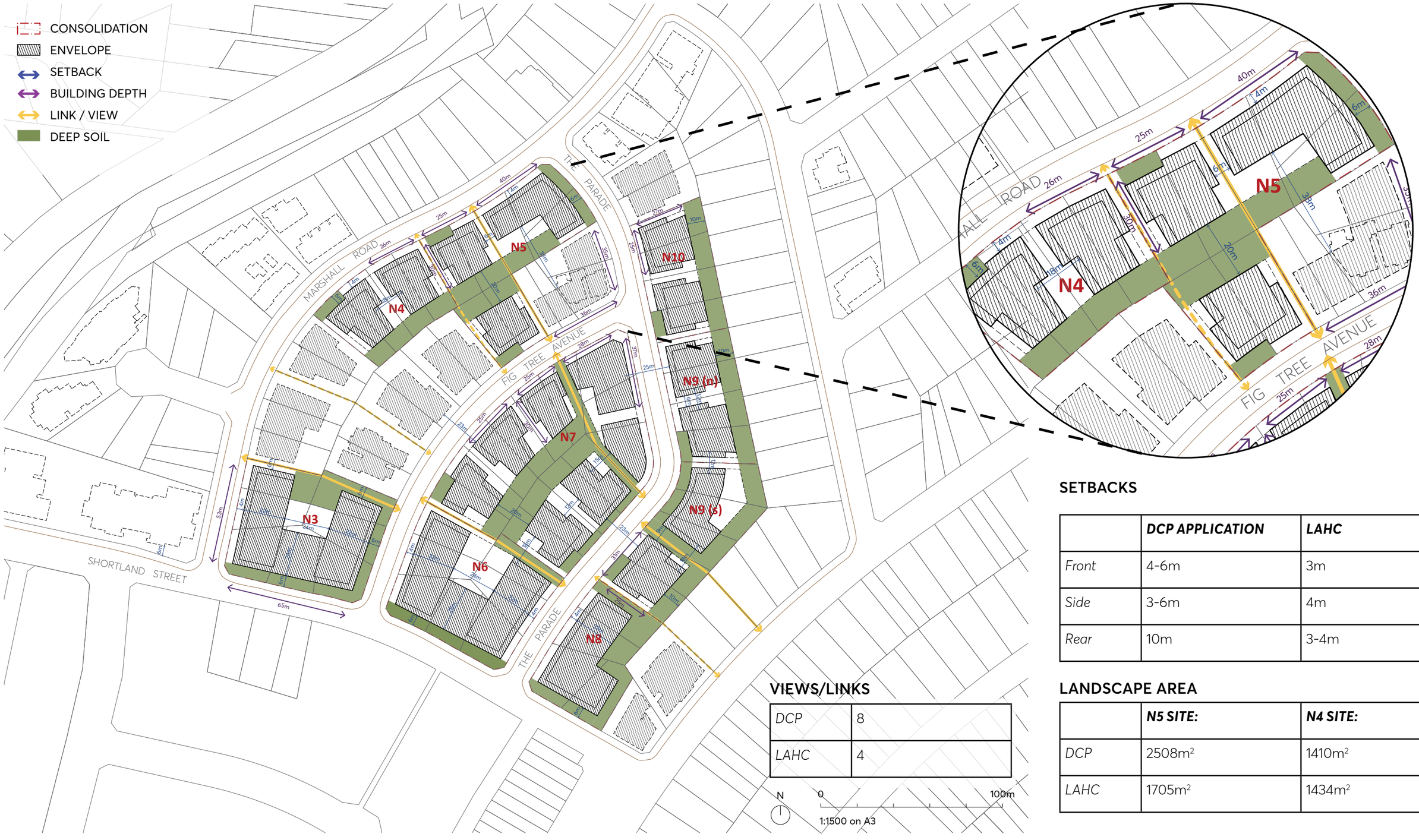
	N5 SITE:	***N4 SITE:***
6M WIDE	1575m²	790m²
4 M WIDE	272m²	209m²
TOTAL %	39%	36%

Attributions/ Opportunities:

- There is an increase in 6m wide deep soil with this layout.
- Increased front setback contributing to greater landscaped area, providing a deep soil pocket of at least 6m x 6m which can accomodate a large canopy tree.
- Rear setback is increased to retain more existing trees and provide contiguous deep soil which will provide a healthier habitat for trees and vegetation. This increased setback will also provide more solar access to the communal outdoor space.
- The building footprints and street wall have been broken down to provide more through site links and greater side setbacks which increase the deep soil running adjacent to properties.

SETBACKS AND BUILDING DEPTH - *LAHC Concept*

SETBACKS AND BUILDING DEPTH - *Application of DCP*



SETBACKS

	DCP APPLICATION	***LAHC***
Front	4-6m	3m
Side	3-6m	4m
Rear	10m	3-4m

LANDSCAPE AREA

	N5 SITE:	***N4 SITE:***
DCP	2508m^2	1410m^2
LAHC	1705m^2	1434m^2

VIEWS/LINKS

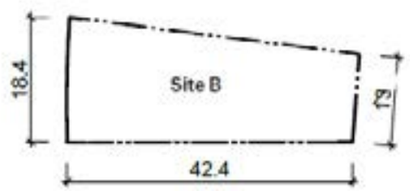
DCP	8
LAHC	4

ISOLATED SITES STUDY - *Redevelopment Scenarios (Frasers/LAHC)*

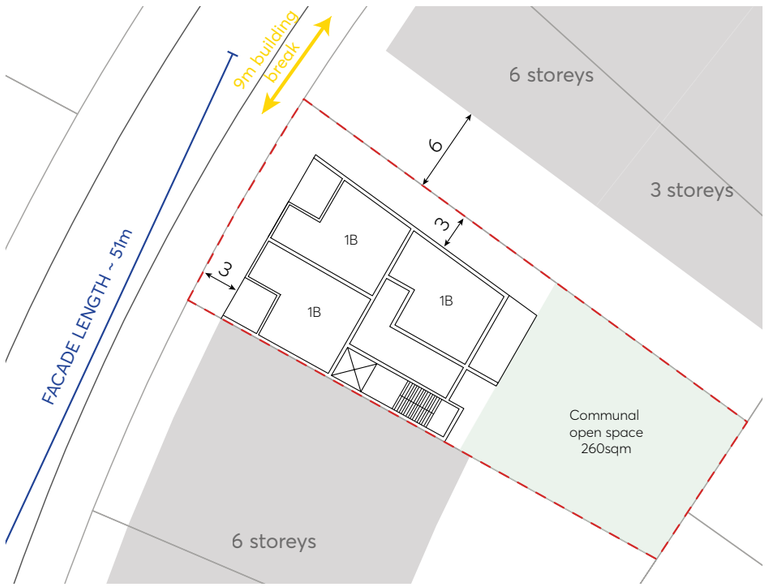
Scenarios 1 and 2 were provided to demonstrated how this one isolated site (Site B) could be redeveloped in isolation despite a site frontage width of less than 24m.

No testing was provided for any other isolated site.

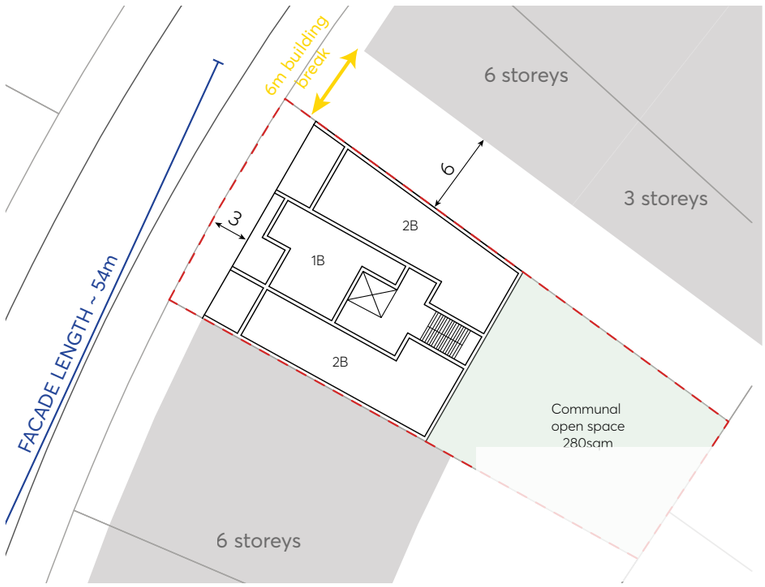
SITE B
Site area: 670sqm
FSR: 1.7
Max. GFA: 1139sqm



North Precinct Isolated Sites Plan



SCENARIO 1
6 storeys | 1094sqm GFA
3m setback to northern boundary
0m setback to southern boundary



SCENARIO 2
6 storeys | 1139sqm GFA
0m setback to northern boundary
0m setback to southern boundary

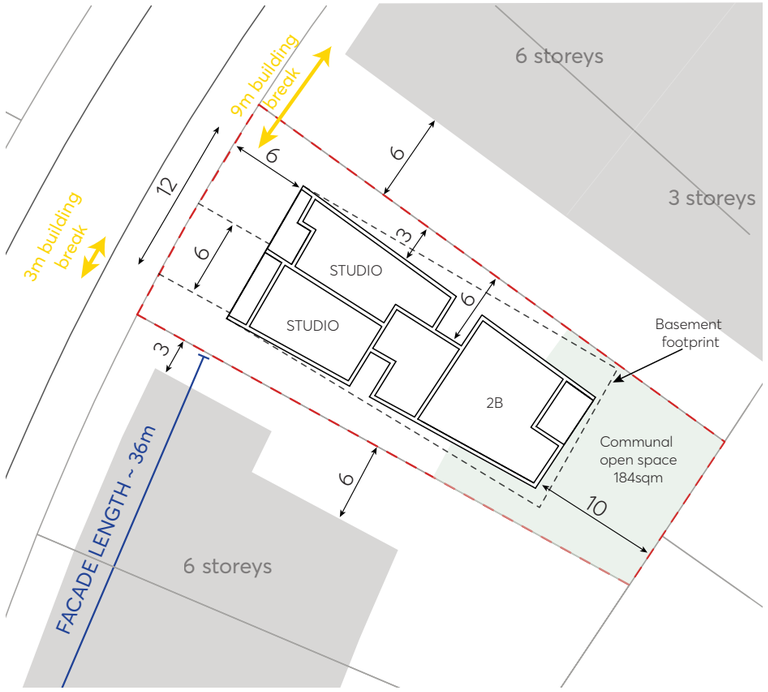
Issues/non-compliances:

- Nil setback to the southern boundary does not comply with Telopea DCP, limits redevelopment potential of adjoining lots and may result in a future blank wall on the boundary should the isolated lot not redevelop
- Nil side setbacks on the site do not comply with the Telopea DCP
- Front setback of 3m is not compliant. A minimum 6m setback should be provided.
- Communal open space does not equal 25% of site area for Scenario 1
- Cumulative facade length of up to 54m with no articulation or building breaks (required after 45m)
- Does not comply with ADG building separation requirements for a 6 storey development
- Does not relate to the desired future character for the precinct, with no pattern of consistent street setbacks and building separation applied

Missing information:

- No plans for the ground floor or other storeys
- Elevations do not include sufficient details (no widths for driveway or lobby areas, no building width, no floor to ceiling heights, no RLs)
- The scenarios do not demonstration of the relationship between the proposed LAHC development and the site
- No driveway details provided including driveway width and placement
- No basement plans. No basement footprint indicated on typical floor plan. The basement is likely to extend beyond building floorprint given the width of the site and impact deep soil zones.
- Area and location of deep soil zones have not been provided
- Scenarios do not address ADG requirements of apartment size, apartment mix, solar access and natural ventilation
- Room layout and window placement have not been provided to show locations of habitable and non-habitable rooms and ensure adequate building separation
- Access into the building from the street and communal open space at the rear have not been provided

ISOLATED SITES STUDY - *DCP Application and Amalgamation*



APPLICATION OF DCP CONTROLS
3 storeys | ~ 540sqm GFA

- Breaks up cumulative impact of development on the street
- Setbacks to LAHC facade to the south provides a better response to current and future development on the isolated site and complies with Telopea DCP
- May provide better solar and ventilation access to apartments (than those built to a party wall)
- Width of building leads to smaller apartments and limits apartment mix
- Limited to 3 storeys of development given additional ADG separation requirements over 4 storeys
- Height and width constraints may limit development potential of site (only achieves half of the possible GFA)
- Basement will extend beyond the building footprint which could impact deep soil zones
- Solar access and natural ventilation requirements may not be met for all apartments
- Driveway takes up half of the building frontage which will impact apartments at ground level

AMALGAMATION WITH LAHC SITES
6 storeys | ~ 1135sqm GFA

- Development can reach maximum GFA
- Complies with ADG separation requirements and allows for better breaks and space between buildings to comply with apartment size, solar access and natural ventilation requirements
- Deep soil zone targets are met, including half located at the rear of the property
- Communal open space requirements are exceeded
- 6m front setback allows for tree planting and further deep soil zones
- Cumulative facade lengths are at a more human-scale and do not exceed maximum facade lengths
- 6 storeys of development can be achieved with adequate setbacks in place
- Width of development offers for better driveway and basement function
- Creates a strong pattern of built form and breaks along the streetscape