Greg Burgon

11 Henry Kendall Crescent

Mascot NSW 2020

Dear Minister for Planning and Public Spaces,

Re: Objection to the proposed State Significant Development

Botany Road, Mascot, Affordable Housing (SSD-72393459)

Thank you for the opportunity to comment on this proposal. I object to the proposal in its current form with several design issues highlighted, and provide alternatives to improve the design to address these issues:

 The design of ground floor apartments, with enclosed balconies and no apartment entrances from the street, results in an unacceptable interface with the public domain, detracts from the local character, is undignified for tenants and is inconsistent with good design principles for Social Housing.

The proposed enclosed balconies / winter gardens for ground level apartments, lack of ground floor private garden space in the 7m setback zone, and no private entries to the apartments from the street creates an unacceptable interface to the public domain and is inconsistent with *Good Design for Social Housing* (NSW Government Architect, 2020). The proposal also misses an opportunity for passive surveillance / eyes on the street.

The exhibited proposal is inconsistent with two goals and underpinning principles of *Good Design for Social Housing*:

Belonging: the quality of our housing and urban design fosters a sense of belonging and supports social cohesion and community wellbeing.

This is underpinned by the following principles:

- Mixed Tenure: our hosing is indistinguishable from private housing and is wellintegrated within diverse communities
- Good shared and public spaces: our housing provides welcoming and safe public spaces and common areas, that support positive social interactions

- Contribute to local character: out housing contributes to distinctive neighbourhoods by interpreting the past, present and future identity of places and their communities.

Wellbeing: The design of our homes and their context supports the physical, cultural, social, and economic wellbeing of tenants

This is underpinned by the following principles:

- Healthy environments: our housing supports the physical and mental health and safety of our tenants
- Good for tenants: out housing considers the needs of our tenants, has low running costs and is flexible to adapt to future requirements
- Quality homes: create a sense of dignity by provided housing that tenants are proud to call their home

The exhibited design that lacks ground-level private gardens, and private gardenapartment entrances with fully enclosed is inconsistent with the principles of Belonging and Wellbeing. In particular the design of the exhibited proposal fails in the following:

- Housing is easily distinguished from private housing enclosed balconies and lack of personalisation of front garden space will make the development feel institutional
- Un-welcoming frontage with no sense of dignity for the tenants or opportunity to personalise their space with gardens, no sense of pride or ownership
- Lack of front gardens or opportunity for private open space at ground level does not contribute to physical and mental wellbeing of tenants and prevent opportunities for tenants to meet their neighbours and local community – especially for young families or older tenants that might be more socially isolated

This is especially the case on the Henry Kendall Crescent and Coward Street frontages.

The housing tenants should have the opportunity for private outdoor space on the ground floor, especially for young families or older people. The existing private gardens are one of the best features of the existing estate and provide an environment for frequent positive social interactions with neighbours and the community.





Existing gardens enjoyed by tenants on Henry Kendall Crescent showing community pride

Gardens and displaying gardening interests and taking pride and a sense of dignity in one's house and garden are a feature of this neighbourhood and the continuation of these healthy behaviours can easily be integrated into a higher density development with good design.

Recommendation: Provide ground level entries to ground level apartments, with their own private open space / garden facing the street.

## 2. Having all vehicular access from Henry Kendall Crescent, which is only a 7m wide carriageway, will have unacceptable traffic impacts

Henry Kendall Crescent has a carriageway of only 7m and is not wide enough for traffic in both directions at the same time, and cars often haver to pull over and give way to oncoming traffic. It is unclear how the residents of 126 apartments, and the associated visitor, garbage and service vehicles would utilise the same arrangement. It is unclear if on street parking is required to be removed.

The traffic report uses out-dated 2022 traffic data and the assumption of a downward trend of traffic in the area is fanciful, especially with the recently opened M8 motorway and Sydney Gateway projects putting additional strain on the local road network.

While the traffic report replies on a traffic generation rate argument, common sense needs to be applied in thinking about the suitability of Henry Kendall Cresent as the only access to the site. The existing two cross-overs to Henry Kendall Crescent provide access for an estimated 6 vehicles (existing spaces is not covered in the traffic or planning reports) cars, so the increase in use of this access point for 57 spaces plus loading and servicing is significant.

The location of the driveway entrance is close to the intersection and queuing has the potential to conflict with pedestrian movement towards the train station and the flow of buses, bikes and vehicles on Coward Street.

The *Bayside Technical Specification Traffic, Parking and Access* specifies service vehicle access is to be combined with parking access (Bayside Council, 2023, page 10):

(iv) Residential Flat Buildings, Mixed Use Developments, Commercial Development, and Industrial Development Access may be provided by a single access driveway designed in accordance with AS2890.1 and AS2890.2. Multiple driveways are discouraged and should be amalgamated into one driveway. Service vehicle access is to be combined with parking access

Recommendation: Provide vehicular access via Botany Road as left-in left-out (as previously proposed as part of the planning proposal), with a single driveway for garbage trucks and cars, adjacent the Ambulance site (refer to Figure 1 and the annotated red arrow). While the Transport and Infrastructure SEPP (Section 2.119) seeks to minimise development accessing classified roads, in this instance, there is no practicable and safe alternative access from the local road network primarily because of the 7m carriageway width of Henry Kendall Crescent.

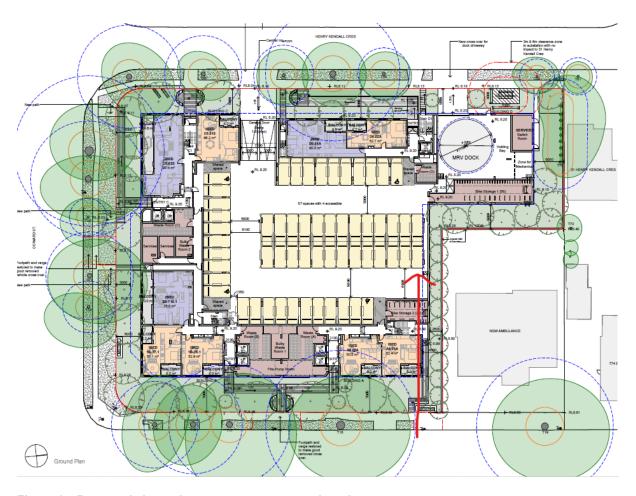


Figure 1 – Proposed alternative access arrangement in red

3. Building massing should be amended to improve transition to the adjoining neighbourhood, minimise visual bulk from the Memorial Park, and reduce overshadowing to the park.

A step in building heights on Coward Street to create a part 8 storey, part 6 storey elevation would significantly improve the presentation of the building and reduce overshadowing impacts. Henry Kendall Crescent and Coward Street are both relatively narrow streets and 8 storeys for this length is overbearing.

Every opportunity to minimise open space impacts on the Memorial Park should be explored, given there are so few quality open spaces in this area.

The proposed 3 storeys on Henry Kendall Crescent is an appropriate response to the built form context of low-density housing.



Figure 2 – Proposed amended building envelope shown in red.

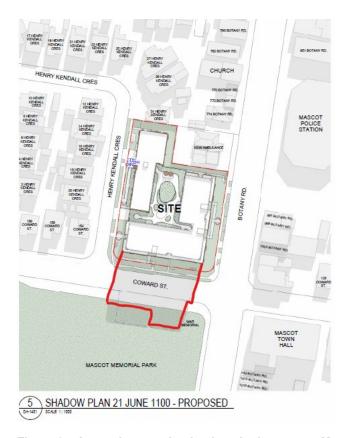


Figure 3 – Approximate reduction in solar impacts to Memorial Park shown in red, if the Coward Street elevation is amended to be part 6, part 8 storeys.

## 4. The development could give much more back to the neighbourhood

While the need to provide housing is undeniable and should be prioritised, we all have a responsibility to be promoting good planning and urban outcomes, particularly in developments of this scale, and on public land. There are three areas where the proposal could be improved in this regard:

- Provision of high-quality retail space. While it is recognised that the site is not in a centre or employment zone, it is on a prominent corner and the town's main street, and a retail tenancy on the site would service the tenants, residents and nearby businesses and services, including the police and ambulance stations (who currently rely on a coffee truck) and activate the park and street. As an example of what could be achieved, the new apartment development on the corner of King Street and Botany Road provided a high-quality retail space that has been tenanted by Three Blind Mice shop and restaurant. This business has bought so much life and energy to Mascot and sets a new benchmark.
- Quality of the pedestrian environment in the vicinity. The footpaths in the immediate vicinity are in much need on an upgrade. The north-east corner of the crossing of Botany and Coward does not have at grade crossings for prams or wheelchairs. While it is understood that this is a council matter, the

- applicant is encouraged to explore opportunities to ensure that local contributions go towards upgrades where they are needed, and that they are provided in line with the construction program for this development.
- Contribution to the public open space network. The proposal does not make any contribution to the public open space network and will impact existing open space by overshadowing Mascot Memorial Park. The Memorial Park is a valuable open space asset but will need to evolve to accommodate more intensive use. More free active spaces, picnic tables, and additional play ground facilities will be needed to accommodate population growth. Any opportunities to deliver open space upgrades as works in kind, delivered in line with the proposed 126 homes, should also be explored with Council.
- 5. In-active ground level frontage to Botany Road and Coward Street and location of waste rooms next to lobbies are results in an unacceptable interface with the public domain, detracts from the local character, is undignified for tenants and is inconsistent with good design principles for Social Housing.

Placement of garbage rooms at street frontages makes the buildings uninviting is a poor interface to the street. It is made worse that the building entrances are next to the garbage rooms. The elevation from the street shows approximately 1/3 of the elevation is non-active. Additionally, the bins have to be wheeled past the lobby to access the MRV doc / holding bay.

Recommendation: move these in-board so that apartments and lobbies face the street, and that bins are not near the entrances / lobbies.

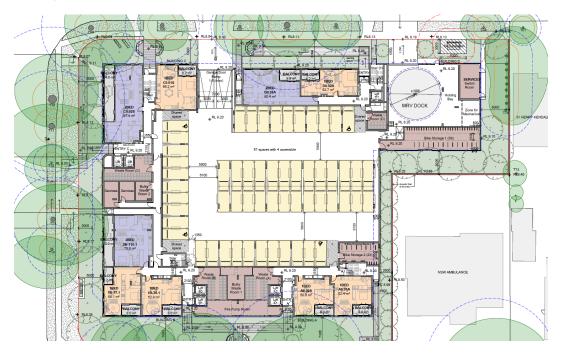


Figure 4 - Plan showing waste rooms and services to Coward Street and Botany road



Figure 5 - Elevation showing waste rooms and services taking 1/3 of the ground-level frontage

6. Waste management relies on a single hoist to move all bins to the holding bay creating an unacceptable risk that bins will be put on the street

Unresolved garbage collection design is such a significant issue for the areas around the Mascot Station. The MRV dock and bin holding bay is set at RL8.2 and waste rooms are set at RL 9.2 requiring a waste hoist to move the bins to the holding bay ready for pickup.

If hoist in-operable, bins will be taken to the street, which is not acceptable, especially given the frequency of waste pickup will be twice a week.

Recommendation: Raise MRV dock and holding bay to be level with the waste rooms so that no waste hoist is required, and bins will be able to be moved in and out of the MRV doc.

## Conclusion

I object to the proposal in its current form with several design issues highlighted and provide alternatives to improve the design to address these issues. With these changes, the proposal could be a good outcome for the site and neighbourhood.

We appreciate the need to deliver new homes and agree this is a good location for intensification, but it cannot be housing at any cost. Good street activation and good design will set this site up for success for many generations to come, and importantly re-build the community's trust in how density and housing can be done well.

Yours sincerely,

**Greg Burgon** 

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