



Your Reference: MP 11_0046
Our Reference: NCA/4/2012
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Director, Urban Assessments
Department of Planning
GPO Box 39
Sydney NSW 2001

Attention: Kate McDonald

13 December 2012

Dear Ms McDonald,

**Major Project 11_0046 – Modification of Concept Plan MP05_0086 and the Construction of Stage 3 Residential Development – Buildings 11-17
61 Mobbs Lane - Epping – former Channel 7 Site (Epping Park)**

I refer to the public exhibition of the above Major Project seeking approval for the modification of the Concept Plan and the construction of Buildings 11 to 17 (Stage 3 Residential Development). Please be advised that Council raises issues with the proposed development with respect to compliance with the approved Concept Plan, crime prevention, landscaping, design considerations and parking. These issues are addressed within this submission.

MODIFICATION TO CONCEPT PLAN

Removal of the internal road in Stage 3 & provision of a single basement carpark to service Buildings 12 to 17

Concern is raised with the proposed deletion of the internal road on the western section of the site and the provision of a combined basement car park to service the dwellings within Buildings 11 to 16.

Although the deletion of the internal road and provision of the landscaped podium allows for a larger open space area, concerns are raised with respect to the proposed basement design. These issues relate primarily to crime prevention and landscaping opportunities.

Crime Prevention

The approved Concept Plan has a street providing formal street addresses to Buildings 11, 12, 13, 14, 15 and 16. This street has now been replaced with a landscaped podium and a single ramp accessing the basement carpark. As a result of the deletion of the street, the area will not be appropriately activated and will lack passive surveillance. The open space between the buildings has the potential to be unsafe, for example if a resident or visitor of Building 12 takes a taxi at night, the drop off point is not only a considerable distance from Building 12 but there will be inadequate passive surveillance along the path.

The planning and design of new car parks should take into account principles of natural surveillance and sightlines, as well as lighting and direct access by pedestrian paths to destinations. Car parks are often a problem from a community safety perspective. They are regularly used by drivers who travel alone at night, making them targets for attack. Lack of access control within large car parking areas can lead to visitors being in areas where they are not supposed to be and no one to question their presence.

Car park design should be kept to as small a size as possible. The *ACT Crime Prevention & Urban Design Resource Manual* (prepared by Sarkissian Associates Planners, 2000) note that more than about 75 cars in one lot makes it difficult to see and travel safely to exits. If the lot design calls for larger areas, the areas should be separated into segments of about 75 cars or smaller, with separate entrances. This principle is also supported by the *Safer By Design Companion* (NSW Police Force, undated) which states that parking should be managed by opening and closing sections according to need. As well as increasing offender risk and effort, compartmentalisation reduces the amount of space that needs to be supervised.

It is therefore considered that separate car parking areas for separate buildings (as originally envisaged for the development) would reduce the fear associated with crime and the opportunities available for criminal behaviour to occur.

Landscaping

The approved Tree Master Plan indicated the street environs as a "Parkland Spine" with the provision of large, endemic canopy trees between the rows of buildings which could attain a height of between 20m-40m at maturity. The proposed combined basement results in a loss of deep soil zone and landscaping opportunities within the development. The proposed application indicates the provision of small trees planted on-slab which does not provide for appropriate scale and type planting in comparison to the height of the proposed buildings.

It is therefore recommended that the approved street is reinstated to ensure security for residents, visitors and the general public through passive surveillance and activation and provide for the envisaged parkland spine through the site.

In addition, it is also considered that ground floor apartments be provided with separate private entrances from the street into the apartments to provide activation of the street and passive surveillance.

Changes to the footprint of Building 17

Insufficient information has been provided to justify the modification of the footprint. The Environmental Assessment only states that the building footprint has been adjusted to allow for underground services. The reasoning behind changing the footprint has not been demonstrated.

It is unclear as to why the modification seeks approval to alter the building footprint of Building 17 within the Concept Plan when clearly all building footprints have changed. This needs to be clarified.

STAGE 3 RESIDENTIAL DEVELOPMENT

Height in General

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.

Compliance with the Concept Plan

The proposal appears to generally comply 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.

Given that this is the final stage of residential development on the site, it is considered that a compliance table should be provided by the proponent which indicates how the entire development complies with the approved Concept Plan. This is particularly important to ensure such matters as floor space ratio, unit mix, car parking and the like has been provided in accordance with the approved Concept Plan.

It is difficult to properly assess the heights of the buildings (particularly in terms of the basement projections) as no natural ground levels have been provided on the plans and the levels on the submitted survey cannot be ascertained. It is therefore considered that the Department of Planning and Infrastructure carry out the detailed assessment to verify compliance with heights.

The building footprints of the buildings have changed to those approved within the Concept Plan. This includes the following:

Building 11	Minor changes to building footprint
Building 12	Loss of building articulation to the east and the central section to the west has less of a recess – this area has now been filled with a unit on each floor
Building 13/14	The main building is generally in line with the Concept Plan however the size and shape of the wings have changed and the access to those wings have been added (in addition to the building footprint). This building is therefore longer than approved in the Concept Plan
Building 15/16	This building has a different footprint to the approved Concept Plan, particularly on the southern elevation
Building 17	We acknowledge footprint changes have been applied for within the Concept Plan modification. There are also encroachments of corridors and stairs into the 3 rd storey element which is not consistent with the Concept Plan.

Whilst most of the alterations to the building footprints are not opposed on urban design grounds, it is of concern that the building envelopes have been compromised to maximise yield. No justifications or design explanation has been provided to address these alterations to the building footprints.

SEPP 65 Requirements

The Department of Planning and Infrastructure should confirm whether the Design Verification Statement submitted with the proposal has been prepared by a qualified designer in accordance with Part 4 of SEPP 65 – Design Quality of Residential Flat Development.

Design Considerations

Front Fencing

Front fencing should be kept to a minimal height to not only delineate public and private space but to provide adequate surveillance of the public domain. The front fences should be a maximum 1.2m high with semi transparent materials/design features used.

Balconies

Parramatta DCP 2011 requires balconies to have a minimum depth of 2.5m. The balconies in the proposed development have a minimum depth of 2m. It is recommended that balconies be increased to have a minimum dimension of 2.5m to increase the amenity of residents within the development.

Southerly Facing Apartments

SEPP65 states that there should be a maximum of only 10% of apartments which are south facing. Building 11 has 10.6% and Building 17 has 12%. It is

recommended that Building 11 and 17 are reconfigured to comply with a maximum of only 10% south facing apartments.

SEPP65 controls and RDFC Rules of Thumb

Council officers have not carried out a full and detailed assessment of the application in accordance with SEPP65 and the Residential Flat Design Code. SEPP65 controls and RDFC rules of thumb for the proposed development should be assessed by the Department of Planning and Infrastructure to ensure that the development complies.

Traffic & Parking Matters

Notwithstanding the issues raised with respect to the provision of a combined basement car park, the following parking and access related matters should also be addressed:

- The number of parking spaces provided on site should comply with the minimum requirement specified under the approved concept plan
- There are 2 disabled parking spaces that need to be provided with a shared space (one space located in the lower ground near the pedestrian egress point and one space located in the upper basement near stairs opposite the proposed stacked parking spaces). The dimensions and configuration of the disabled parking spaces are to comply with AS 2890.6-2009 (a dedicated space plus a shared space - 2.4m wide x 5.4m long each with a bollard installed on the shared space).
- There are a significant number of stacked parking spaces within the basement levels and this is not a preferable, or necessary design layout for a new development.
- In accordance with Tables 3.1 and 3.2 of AS 2890.1-2004, the driveway access to the basement level should be separate entry (6m wide) and exit (4m to 6m) with a physical separator (1m to 3m wide).
- The dimensions and configuration of the disabled parking spaces are to comply with AS 2890.6-2009 (a dedicated space plus a shared space - 2.4m wide x 5.4m long each with a bollard installed on the shared space)

Drainage

The deletion of the Road 1 (Epping Park Drive) between CH 140 & CH 310 and the location of the Buildings 11 to 16 over a single combined basement will not alter the approved drainage concept. These changes will not increase the impervious areas or re-direct the catchment areas. The overall effect will be insignificant, in terms of stormwater runoff. The previously approved water quality controls and the arrangements of the OSD basin will remain the same.

The concept drainage plans submitted with the application are considered acceptable. The discharge outfalls into the OSD basin are similar to the previous drainage concept and there are no significant changes to the primary drainage

disposal systems approved previously. It is also noted that a stormwater management statement has also been submitted with the latest submission (prepared by AT & L Civil Engineers), confirming that all the stormwater design still function in accordance with the intent of the original and subsequent approvals.

Therefore, no objections are raised to the latest stormwater drainage modifications.

Voluntary Planning Agreement

Council does not support any changes to the Concept Plan or Stage 3 development which may be contrary to the Voluntary Planning Agreement dated 16 March 2012. This includes any changes to the open space provisions of Schedule 1 of the Voluntary Planning Agreement.

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