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Our ref: MP10_0171 MOD 3

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

Dear Mr Gordon,

330 Church Street, Parramatta (MP10_0171 MOD 4)

The exhibition of the section 75W report for the above project ended on 16 August 2013.

In accordance with section 75H of the *Environmental Planning and Assessment Act 1979*, the Director-General requires you to respond to the issues raised in a response to submissions (RTS) or preferred project report (PPR).

The department has undertaken a preliminary assessment of the proposal and has provided comments at **Attachment 1**. The issues the department considers relevant to the assessment of the proposal and will be required to be addressed in your RTS or PPR include:

- Built form and urban design;
- Car parking;
- Access, egress and traffic impacts;
- Compliance with SEPP 65;
- Architectural plans; and
- Statement of Commitments.

In addition, the department has enclosed copies of the submissions received during the exhibition period (see **Attachment 3**).

Your contact officer for this project, Kate MacDonald, can be contacted on 9228 6435 or via email on kate.macdonald@planning.nsw.gov.au. Please mark all correspondence regarding the project to the attention of the contact officer.

Yours sincerely

Heather Warton
Director

Industry, Social Projects and Key Sites

18/3/13

Attachment 1

1. Built Form and Urban Design

Building Height

The department has reviewed the heights proposed for the eastern and western towers in the context of the likely future character of the Parramatta CBD. Based on this review the department considers that the proposed heights are not appropriately justified in terms of the transition between the centre and the periphery of the CBD. Furthermore, the department is concerned about the urban design impacts of the proposed modification on the profile of the northern edge of the CBD.

In addition, the department has also concluded that the proposed modification would create a significant height disparity between the eastern and western towers which would lead to a less harmonious built form outcome. In this regard, the final design of the building should maintain a similar height ratio between the two towers as identified under the current project approval (a height ratio of approximately 1.5:1 between the western and the eastern tower).

Podium Design

The department supports the proposed increase in podium height; however the department has concerns with the architectural detailing of the podium. In this regard, the department considers that the podium should be redesigned to:

- Delete the steps adjacent to the western elevation of the building to provide a seamless accessible connection between the street, the colonnade and the internal floor areas of the development;
- Provide further modulation of the ground floor retail spaces to ensure the final design of the podium provides an appropriate response to the fine grain character of Church Street; and
- Remove the pool shade structure, or set it back from the parapet to achieve a more streamlined podium.

2. Car Parking

The number of car parking spaces must be reduced commensurate to the number of residential and serviced apartments lost as a result of decreasing the height of the building. Any reductions in the number of car parking spaces should be made at podium level to provide a higher degree of amenity to the apartments proposed within the podium levels.

3. Access, Egress and Traffic Impacts

Universal Access

There is insufficient detail to enable an understanding of how the transition in levels adjacent to the eastern boundary of the site and the eastern tower lobby will be resolved. Further details should be provided to identify how an accessible path of travel will be provided from the public domain adjacent to the eastern boundary of the site and the eastern tower lobby.

In addition, the Access Review prepared by Morris Gooding Accessibility Consultants should be updated to consider any revisions to the access arrangements adjacent to the eastern and western boundaries of the site.

Pedestrian/Vehicular Conflicts

The department is concerned that the design of the driveway entry to the site will result in vehicular and pedestrian conflicts on land that will be redeveloped by the council as a future public square. Additional details should be provided to identify how the driveway located on the south-east corner of the site will be designed to ensure that these conflicts are minimised. The information submitted to address this issue must include:

- A site plan which extends to Phillip Street which illustrates how pedestrians will obtain access from the footpath to the lobby entrance; and
- Plans depicting the location of all security gates/roller doors and card readers.

Traffic Impacts

The department notes that the proposed modification does not comply with the pedestrian and vehicle sight lines specified in AS2890.1. Drawing A100 should be revised to address this issue.

The department also has concerns regarding the impacts of the proposed basement access arrangements on the adjoining landowner at 328 Church Street. The RTS/PPR should address how these impacts will be managed to ensure a suitable level of access is provided to the adjoining landowner.

4. Compliance with SEPP 65

The SEPP 65 Design Quality Principles Verification and Report prepared by Tony Caro Architects identifies that 24 serviced apartments and 24 residential apartments are proposed at podium level. Notwithstanding, the architectural plans do not identify which apartments will be used for residential and serviced apartment uses. This issue should be resolved in the Preferred Project Report.

In addition, the department has identified a number of apartments within the podium levels that do not achieve an appropriate level of amenity as articulated in SEPP 65. In this regard, the architectural plans for the podium level apartments should be revised to:

- Improve solar access and ventilation along the internal corridors;
- Provide reduced travel distances and a direct line of sight to the entry of each apartment from the access points proposed on each level;
- Remove the enclosed study rooms proposed in south and east facing apartments; and
- Reconfigure the apartments located on the south-east corner of the podium to reduce the length of the internal corridor and improve the access arrangements to the adjoining balconies. In this regard, it is the department's preference that the apartments identified in the plan provided at **Attachment 2** are consolidated to provide a higher level of amenity.

Note: These issues may be addressed by converting all of the podium level apartments to serviced apartments.

The department also seeks confirmation that all balconies servicing the residential apartments comply with the requirements of SEPP 65.

5. Architectural Plans

Shadow Diagrams

The shadow diagrams must be revised to reflect any revisions to the proposed building.

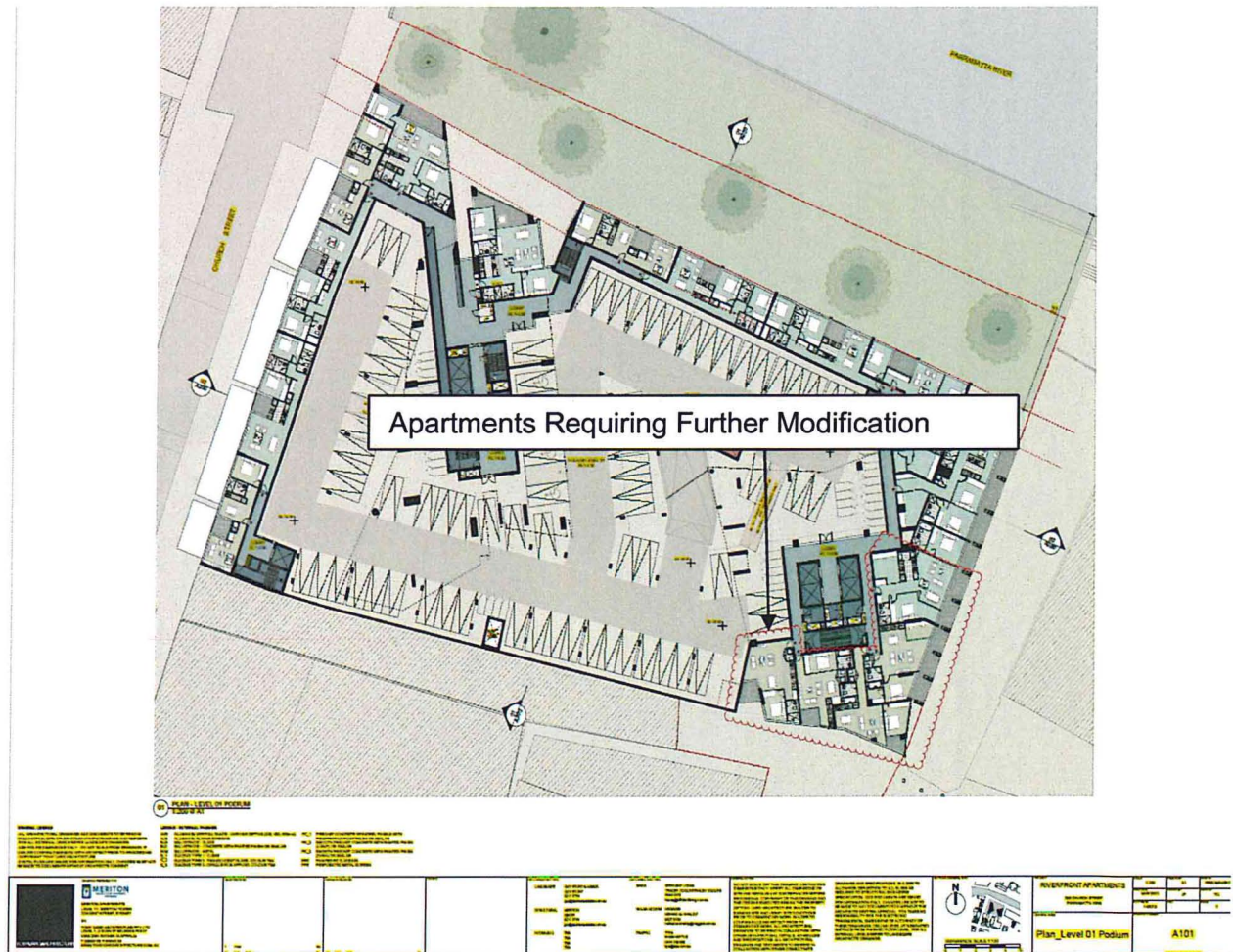
BASIX

The BASIX certificate will need to be updated to reflect any changes to the residential component of the proposed building. In addition, the commitments identified in the BASIX assessment and labelled 'Show in DA plans' should be included within the architectural plans.

6. Statement of Commitments

The Statement of Commitments should be revised to incorporate all mitigation measures identified in the appendices of the section 75W modification report. In the event that these mitigation measures change due to design modifications, the Statement of Commitments should be revised to incorporate these changes.

Attachment 2 – Apartments Requiring Modification



Attachment 3 – Submissions

Please refer to the following link on the department's website:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=5998