



City Plan Strategy & Development P/L  
ABN 58 133 501 774

22 February 2021

**Our Ref:** 210222 SE HD

**Chris Shinn**  
**Coordinator Strategic | Land Use Planning**  
Fairfield City Council  
PO Box 21  
FAIRFIELD NSW 1860  
[cshinn@fairfieldcity.nsw.gov.au](mailto:cshinn@fairfieldcity.nsw.gov.au)

Dear Chris

**RE: PRE PLANNING PROPOSAL ASSESSMENT - LAHC SITE - KAMIRA AVENUE - VILLAWOOD TOWN CENTRE**

## **1. INTRODUCTION AND BACKGROUND**

### **1.1. Background**

City Plan has undertaken an independent planning and design review of a proposed design concept scheme for a site in the Villawood Town Centre, to inform Council's pre planning proposal process. The concept has been prepared on behalf of the Land and Housing Corporation (LAHC) for its site in the Villawood Town Centre. The concept is assessed is provided as **Attachment A**.

Through our former roles at TPG Town Planning and Urban Design, Helen Deegan (Director Major Projects) and Sonny Embleton (Senior Associate) were the lead consultants in the preparation of the Villawood Town Centre Urban Design Study (UDS), adopted by Council in March 2018. Council has referred the initial concept to us to consider its alignment with the underlying principles and objectives of the UDS.

In addition to the material provided, this assessment takes into consideration the presentation provided by the proponent on 11 February 2021. The proposal encompasses the entire LAHC site and requires an amendment to the Fairfield LEP 2013 (FLEP 2013) to establish the necessary land use permissibility for a supermarket. There is also a small portion of the proposed built form at the south western portion of the site that is located on Council owned land presently zoned RE1 Public Recreation. This site is subject to a current planning proposal (PP-2020-1673) in the post exhibition stage, which seeks to align the zoning with the intended outcomes of the UDS.

Irrespective of the applicable planning approval pathway, this advice considers the broader whole of site concept and is intended to inform Council's future consideration of the concept in relation to its consistency with the UDS under any applicable approval pathway.

It is noted that this is a high level assessment to consider alignment with the intended outcomes and underlying principles of the UDS. It is not intended as an assessment of compliance with the broader statutory planning framework. Where appropriate, this assessment may refer to other planning instruments such as FLEP 2013 or the Villawood Town Centre DCP 2020 (DCP), where we have identified relevant interactions with the UDS.

Suite 6.02, 120 Sussex St, Sydney NSW 2000  
P +61 2 8270 3500

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### 1.2. The Site

The site is located at 2-14 Kamira Avenue, Villawood (the site). The site is bounded by Villawood Road to the north, Kamira Court to the south and east, and Kamira Avenue to the west. The site is illustrated in Figure 1.



Figure 1 Subject Site

The site consists of the following land parcels:

- Lot 136 in DP16186
- Lot 39 in DP202006
- Lot 37 in DP202006
- Lot 381 in DP1232437
- Lot 382 in DP1232437

The site is a large vacant land parcel under the single ownership of LAHC and formerly contained 1960s three storey walk-up public housing. The site has remained vacant since 2005 and presents a unique opportunity to contribute to the revitalisation of the Villawood. This site is currently grassed and not accessible to the public.

This site is bisected by the east-west aligned portion of Kamira Court, which connects through to Kamira Avenue and western residential areas identified under a Council led planning proposal (PP-2020-2578) for future high density residential development of up to 6 storeys.



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Under the FLEP 2013, building height of between 27m on the western side of the site, and 39 m on the eastern side of the site adjacent to Kamira Court. An overall FSR of 2.5:1 is permissible across the site.

### 1.3. Key elements of the Villawood Town Centre Urban Design Study relevant to the site

The site is a key opportunity site identified in the UDS located within the Residential Precinct. The approximate location of the LAHC site in relation to the Villawood Town Centre Structure Plan is illustrated in Figure 2.

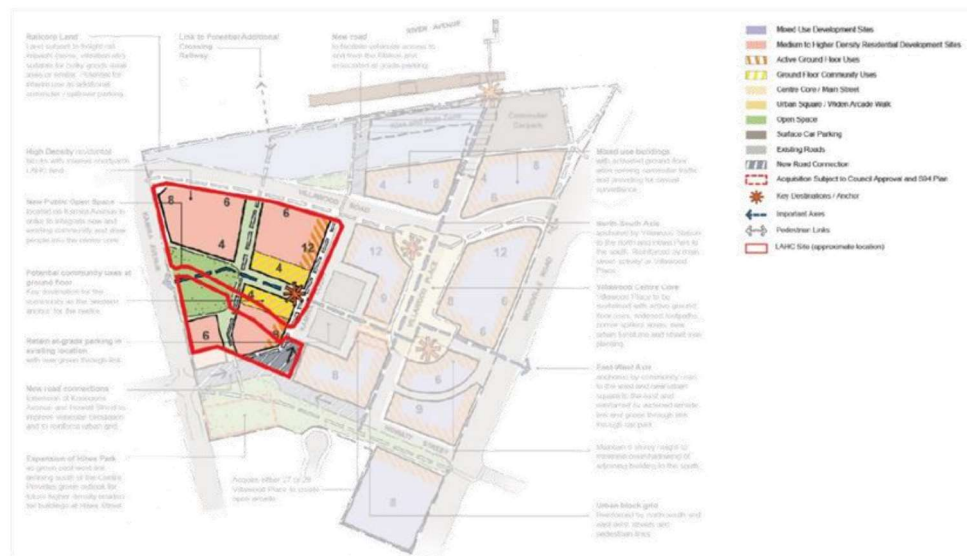


Figure 2 Approximate location of the LAHC site in relation to the Villawood Town Centre Structure Plan

In relation to the subject site, the UDS was prepared to take into consideration the outcomes of engagement with LAHC, which sought opportunities to align the recommendations UDS with LAHC's objectives for the site where appropriate. As can be seen from Figure 2, the site is intended to be developed largely for residential purposes with some complementary non-residential uses including a community facility. For this site, the UDS identifies the opportunity for a component of affordable housing to be accommodated on the site, a core element of LAHC's remit.

Articulated building height of between 4-12 storeys is envisaged across this site under the UDS. In addition to affordable housing, the UDS and DCP seek to establish a range of public benefits including:

- Establishing a new anchoring destination west of the Villawood Place main street with community facilities and neighbourhood retail uses to provide amenity and activate the public realm;
- Creating a new 3,000sqm public open space/neighbourhood park and support amenity of the emerging high density neighbourhoods in the locality - (it is noted that Villawood Town Centre DCP 2020 reduced the required minimum public open space area from 3,500sqm to 3,000sqm);
- Providing new east/west and north south through-site pedestrian links to improve permeability and accessibility; and
- Reconfiguring and rationalising the Kamira Court road reserve, which presently bisects the site to:
  - create a more suitable development site;





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- redefine the expanded Hilwa Park; and
- enable a logical through connection to Kamira Avenue.

It is noted that relocating the link between the car park and Kamira Avenue will require some reconfiguration of land ownership boundaries between Council and LAHC owned land.

The successful connection of this site (and proposed neighbourhood park within it) to the Villawood Place main street is dependent upon establishing an improved pedestrian link across the existing Council owned car park. This relies partly a landscaping opportunity across the car park as well as the potential for acquisition or dedication of land to widen the existing walkway between the car park and Villawood Place.

#### 1.4. Pre Planning Proposal Concept for the LAHC Site

The LAHC development concept is for a mixed use development that includes predominantly residential uses (including affordable housing), supported by 3,000sqm neighbourhood park, a pocket park, new pedestrian links, 3,000sqm of retail space including a supermarket, a retail plaza activated by retail and community floor space at ground level.

In general, the concept incorporates all of the recommended elements intended to be delivered under the Villawood Town Centre Structure Plan, provided for in the UDS.

The concept proposes to vary some aspects of the Villawood Town Centre Structure Plan as summarised below:

- The introduction of a supermarket including service vehicles access near the corner of Villawood Road and Kamira Court, noting that this use is not currently permissible under the site's current R4 High Density Residential zoning and the UDS incorporated non-residential uses consistent with the zone (e.g. neighbourhood shops and community facilities).
- Reconfiguration of building heights across the site.
- Reconfiguration of the neighbourhood park to create a longer and narrower park than envisaged by the UDS, extending to the realigned Kamira Avenue/ Kamira Court intersection.
- Reconfiguration of pedestrian links, including a narrowing of north-south and east-west links, and incorporation of the southernmost north-south link into the neighbourhood park.
- Reconfiguration of active street fronts with active retail focus on the corner of the east west pedestrian link and the Villawood Road and Kamira Court corner.
- Refocusing of the community facility adjacent to interface with the north side of the new neighbourhood park.

Figure 3 provides a comparison between the adopted Structure Plan and the proponent's scheme.





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Figure 3 Comparison between the adopted Structure Plan and the proponent's scheme

The use of a supermarket is not permissible under the current R4 High Density Residential zone. If merit exists for providing a supermarket on the site, a suitable enabling mechanism would need to be established by way of amendment to the FLEP 2013. While a proposed planning mechanism is not stated in the package of information provided by the Proponent, it is understood preliminary discussions have considered the potential for expanding the B2 Local Centre zone into the site or establishing an Additional Permitted Use via Schedule 1 and the associated Key Sites Map under FLEP 2013.

## 2. ASSESSMENT OF THE PRELIMINARY CONCEPT

City Plan has undertaken an assessment of the concept in relation to the intended outcomes sought by the UDS and the associated Structure Plan. Our consideration takes into account the variations proposed under the UDS and, where necessary, under the LEP and DCP to the extent where the concept relates to and potentially impacts on the delivery of the intended outcomes of the UDS.

### 2.1. Establishing a supermarket on the site

#### 2.1.1. Suitability

The intent of the Structure Plan and retained R4 High Density Residential zoning is to facilitate development of a primarily residential nature, with some ground level neighbourhood retail and community uses. Inclusion of non-residential uses is intended to provide for ground level activation and establish an anchoring destination to the west of the centre's heart. At the time of preparing the UDS, there was no evidence to suggest any need for expansion of the centre westward, apart from a limited retail and community offering to support the amenity of new residential development and the activation of the public domain and key links. This approach resulted from high level planning and urban design consideration of the commercial strength of the centre, which provided a limited service offering with some vacant premises.



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A new 8 storey shop top housing development has since been built at 888 Woodville Road, and a 12 storey shop top housing development at 1 Villawood Place is presently under construction. These two developments will contribute a significant area of new ground level commercial floorspace to the Villawood Town Centre. Noting there is an approved DA for 47-53 Pedestrian Mall, which includes commercial and retail tenancies. It is understood that an updated DA has recently been lodged with Council seeking an additional two levels now achievable under the FLEP 2013.

In the preparation of the UDS, we note that no formal economic analysis was undertaken to consider the need to expand the B2 Local Centre zone or to support the introduction of a second supermarket. As a result of a visual and qualitative assessment which confirmed a lack of town centre activity and vitality, the UDS took the approach to focus on strengthening and revitalisation of existing and potential commercial floor space in the existing B2 zone, and limiting expansion of non-residential uses. This was the main premise for retaining the existing R4 High Density Residential zoning on the subject site.

While there was no known interest for a new supermarket in the centre at the time of preparing the UDS, it is accepted that there may now be, or already have been, unmet demand for an additional supermarket. It is also recognised that the LAHC site is one of the few centrally located opportunities to establish a new supermarket on a site with a suitable size and configuration in the town centre. It is also considered that an additional supermarket may contribute to further activation of the centre.

Based on discussions at the 11 February meeting, it is understood that the Proponent has commissioned a report by HillPDA that identifies significant 'retail leakage' from Villawood to other surrounding centres, suggesting there is unmet latent demand for retail activity in this location. HillPDA's report has not been reviewed as it is not in the scope of this assessment to make conclusions in relation to the economic feasibility, the need for a second supermarket, or potential interest by supermarket providers to establish such an outlet in the centre. Rather, the focus of this assessment is on the planning and urban design merits of a supermarket and the wider proposal in relation to the intended outcomes of the UDS, and the merits of the planning mechanism to deliver it, if it is appropriate and feasible.

The overarching objective of the UDS was to support the amenity of residential uses on the western side of the centre by establishing an anchoring destination, to the following effect:

- Providing a higher level of convenience and amenity for new residential uses in the locality.
- Providing opportunities for the community to gather and interact.
- Attracting, encouraging and facilitating east west movement between the Villawood Place main street and the new neighbourhood park.
- Activating the public realm at ground level to promote safety and surveillance.

Establishing a new supermarket in this location is generally consistent with these intended outcomes as it will establish a strong anchor and enhance the relationship between east and west across the centre. An increased retail offer including a supermarket is supportable in the proposed location on planning grounds, provided that:

- its feasibility can be demonstrated on economic grounds;
- it will not detract from the revitalisation objectives of the existing B2 zone, or result in oversupply of retail floor space; and
- the location, design and configuration of the supermarket supports the intended activation outcomes in relation to the site and its immediate surrounds.

The benefits of the inclusion of second supermarket in the centre is recognised and a planning proposal that seeks to introduce a shop uses onto the site would be generally consistent with the UDS. This is on the proviso that a PP is appropriately supported by an economic impacts statement to confirm demand for and feasibility of the facility and its broader effects on the revitalisation of existing and potential floor space across the existing centre. Refer also **Section 2.1.2**.





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### 2.1.2. Considerations for an appropriate planning mechanism to permit a supermarket

In considering an appropriate planning mechanism to deliver a supermarket in the centre, thought needs to be given both to the Proponent's intended outcomes as well as possible unintended or undesirable outcomes that may be out of the Proponent's control. In particular, we consider the intended outcome of providing a supermarket, as well as a potential circumstance where a supermarket is not able to be delivered as intended.

If the B2 Local Centre zone were to be expanded, all residential uses in the zone would have to be provided in a shop top housing format. This would require all development to provide a non-residential ground floor, irrespective of whether such uses are feasible and whether the location of those uses was suitable.

As all development in the expanded B2 zone would need to be provided with a commercial ground floor, the expansion of the B2 zone may result in the creation of excess or poorly located commercial floorspace on the west side of the centre. This may result in limited uptake of commercial floorspace in the absence of the supermarket anchor, or potentially compete with revitalisation objectives in the existing B2 zone to the east of the centre. In relation to the site, the UDS identifies some areas where activation with retail or community uses is necessary, with the remainder of building frontages providing a ground level address facing the public domain so as provide visual interest and passive surveillance.

As an alternative, it is worth considering identifying part or all of the site on the Key Sites Map, establishing an Additional Permitted Use (e.g. shop) under Schedule 1 of the FLEP 2013, and prescribing an appropriate floorspace limit (e.g. 3,000sqm). This would still allow for non-residential uses at the ground floor where appropriate and feasible, but provide flexibility for a ground floor residential interface to be provided where retail activation is not necessary or warranted such as along the north south pedestrian link between the new park and Villawood Road (as proposed by the Proponent).

This approach would provide choice in relation to the provision of a supermarket, should the future need for or desire to include the facility change. It would allow for new floorspace to be created up to the prescribed limit if it is feasible or can be guaranteed, rather than forcing the creation of non-residential floorspace in a shop top housing development in all development scenarios.

Establishing an Additional Permitted Use is considered to be the most appropriate mechanism by which to achieve the intended outcomes reflected in the concept plan provided, noting that uses such as neighbourhood shops and cafés are permissible in the R4 zone supporting the potential to activate the ground level in the locations supported by the UDS, DCP and FLEP 2013.

### 2.1.3. Facilitating ground level activation

The concept provided illustrates the supermarket having frontage to both Kamira Court (i.e. car park), and the new east-west link connecting to the new park. It is essential that this facility provide a suitable level of activation to both the car park frontage and the east west link as required by the UDS and DCP.

The Proponent advised that the intent is to access the supermarket via the Retail Plaza to the south as well as via an internal traveller to the basement car park. Activation of both the Council car park frontage and the east west link is required under the UDS. In this circumstance, activation outcomes are dependent on the internal supermarket configuration and the interaction between other smaller retail tenancies that may be provided. Further consideration is required in relation to pedestrian access to ensure an appropriate level of activation of the public realm occurs.

Having customers pop up internally from an escalator straight into the supermarket may not be desirable or provide a suitable level of benefit supporting the activation of the public domain. Future consideration should be to investigating the merits of alternative configurations that direct customers into the public domain.

Any PP to enable a supermarket should be accompanied with a site specific DCP that demonstrates that the supermarket can be located and suitably configured to avoid blank walls facing the public





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domain, with particular consideration for the activation of the adjacent east west pedestrian link to the park as well as the quality and safety of the pedestrian link across the Council owned car park.

## **2.2. Connection of the site with Villawood Place**

The UDS identifies a pedestrian link between the LAHC site and Villawood Place as an opportunity to enhance east west movement within the Villawood Town Centre. As previously mentioned, this is partly reliant on a landscaping solution across the car park and partly on the potential acquisition by Council of one of the sites (i.e. 27 or 29 Villawood Place) adjacent to the existing pedestrian laneway.

The proposed shifts the alignment of the east west link within the site to the south in order to accommodate the necessary site width for the supermarket. It is not possible to determine what the effects of the alignment on sight lines will be until there is a commitment by Council to acquire one of the aforementioned sites is achieved.

In this respect, the proposal will either result in an uninterrupted sight line from Villawood Place through to the park, which is favoured by the UDS; or it will result in a vista that is terminated by built form at the site. Inbuilt into the UDS is the acceptance of either outcome, as each has its merits. Provided that there is a suitable architectural response, a terminated vista provides the opportunity for a direct sight line towards the retail activity occurring on the site as a 'beacon' and 'stepping stone' to the park; whereas a direct sight line to the park has potential to attract direct movement between Villawood Place and a key community destination and enhance potential for natural surveillance and safety. Either option is therefore supportable, however irrespective of whether a terminated vista or direct sightline to the park were to occur, we strongly encourage the Proponent to establish an architectural response that responds appropriately to this important gateway and vista.

The importance of this link in relation to the Proponent's proposal will become even more important and as a result of a planning proposal that effectively extends the town centre and increases the retail gravity on the west side of the centre. On this basis, we encourage Council and the Proponent to work collaboratively to explore the opportunity for contributions towards establishing and enhancing link to provide the best opportunity for reciprocal movement and activity between the site and Villawood Place.

## **2.3. Reconfiguration of the neighbourhood park and deletion of north-south pedestrian link**

The design concept provides a 3,000sqm neighbourhood park, noting the site area notation has not been included in the most recent design package, but does not appear to have changed since the earlier scheme. The concept proposes a reconfiguration of the neighbourhood park reflected in the Structure Plan to be longer and narrower. The proposed area of the park meets the minimum area of 3,000sqm set out under the DCP. The southernmost north south link has now been incorporated into the park, effectively establishing a green link that connects with Hilwa Park at the realigned Kamira Court/ Kamira Avenue intersection.

The Proponent has advised that the purpose of the reconfiguration is to reduce the depth of the park to enhance safety and surveillance given the park has frontage to only one public road. The proposed configuration also enables the retention of a number of existing advanced trees on the site along Kamira Avenue.

The park's reconfiguration is not of such significance that it would negatively impact on its useability and is reflective of the overall intent for this space. The incorporation of the link into the park is consistent with the underlying principles of the Structure Plan by providing a more direct and logical connection between the new park and Hilwa Park via the relocated Kamira Court intersection.

The proposal also includes a pocket park at the bend of the realigned Kamira Court, opposite Hilwa Park. Hilwa Park has been recently expanded via rezoning and land acquisition initiatives of Council.

This pocket park was not identified by the UDS but is supported by the DCP. It is a positive addition that will provide an additional stepping stone and activation opportunity between public domain elements in the Town Centre and the expanded Hilwa Park.



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The reconfiguration of the park and incorporation of the southernmost north south link into the park is supported on the basis that it improves on the Structure Plan layout by providing a more efficient use of land, as well as improving safety, passive surveillance and sight lines in the precinct. The Kamira Court pocket park at will also be a valuable addition to the open space network provided it is appropriately activated by buildings within the LAHC site and the opposite site at 47-53 Pedestrian Mall, as reflected in approved DA (DA 261.1/2015).

As the various public places to be provided on the site, including the community centre, we encourage the proponent to further explore the site's placemaking potential and the interactions, roles and functions of each of these spaces with the border place making potential of the wider town centre. It is understood that it is the Proponent's intent to engage the services of a place making specialist to support its design process. This is supported and encouraged.

#### 2.4. Reconfiguration of building heights

The concept proposes reconfiguration of building height throughout the site in relation to the Structure Plan and the heights plan under the DCP. It achieves this in a manner that is consistent with the permissible building heights under the LEP. It is assumed that the overall scheme is compliant with FSR, however a yield analysis for the entire site has not been provided.

The building heights reflected on the Structure Plan and the heights plan under the DCP was formed on the basis of a number of principles including to:

- transition height massing from downwards the Villawood Road Kamira Court corner;
- achieve a human scale along pedestrian links;
- reinforce the architectural prominence of key corner locations;
- allow for an appropriate level of solar penetration into the new park; and
- meet the requirements of the relevant guidance under SEPP65/ ADG.

The DCP seeks to achieve building forms that are consistent with the heights plan. The massing reflected in the heights plan was based on high level block modelling which applied the broad principles of SEPP 65/ ADG and did not include a detailed design of floor plates, which was not part of the scope of the UDS. It would be reasonable for some degree of flexibility to be provided support resolution of detailed design matters, and to adapt to the introduction of a supermarket and reconfiguration of the neighbourhood park.

While the Structure Plan and heights plan outline preferred building height distribution across the site and the wider centre, it is recognised that alternative height configurations that are consistent with the LEP height of buildings map, and relevant objectives and guidance set out under the DCP and SEPP 65/ADG may also be achievable.

In considering whether reconfiguration of building height is warranted, there must be consideration for whether design excellence is achieved and that the relevant aspects of the ADG have been suitably addressed. The scope of this assessment is not to provide a comprehensive assessment of the proposal in accordance with the ADG, this being the role of Council in its formal assessment process.

A high-level assessment of the Proponent's scheme confirms that it achieves the following outcomes:

- Compliance with the maximum permissible building height under the FELP 2013.
- Transition appropriately from the town centre core towards the west, noting that a transition from 8 storeys on the western side of the site to future 6 storey development on the opposite side of Kamira Avenue is a rational approach to massing.
- It may assist in improving overshadowing effects of buildings on the new park (note that no shadow diagrams provided and this would need to be investigated in detail in the assessment process).
- Provides an appropriate response to corner and gateway locations.



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The building heights are generally consistent with the underlying principles and intent of the UDS. If it can be demonstrated that design excellence has been achieved pursuant to CI 6.12 of the FLEP 2013, and the proposal achieves a suitable level of compliance with the ADG requirements, then the reconfiguration of heights in relation to the Heights Map under the DCP should not be used as grounds for refusal.

## 2.5. Consideration for Stage 1 - Building B

At the meeting on 11 February 2021, the Proponent advised that it was under contract to submit a development application for Stage 1 (i.e. Building B) within a limited time frame. City Plan was not part of the subsequent pre-DA meeting between Council and the Proponent, however we were asked to provide particular consideration for the more detailed components of the proposal for Building B to aid in Council's consideration of the proposal in accordance with the UDS.

It is understood that this Building B is intended to remain under the control of LAHC or a not-for-profit housing provider to facilitate efficient and effective ongoing management of affordable housing assets within it. Building B massing can be seen in Figure 4 below and the proposed ground floor configuration in Figure 5.



Figure 4 Location of Building B (outlined in red)



Figure 5 Building B ground floor

Under the UDS, for the portion of the site on which Building B is located, the UDS envisages the following outcomes:

- Modulated building form between 4 and 8 storeys.
- Activation of Kamira Court with non-residential uses at ground level.
- Reconfiguration of Kamira Court as an extension of Howatt Street to connect with Kamira Avenue.
- An east west pedestrian link at the northern edge of the building.
- A north south pedestrian link between the new park and Howatt Park.
- A community facility/ floorspace fronting the east west pedestrian link.
- Passive surveillance over the public domain.

In addition to the above, the DCP indicates the addition of a new pocket park at the bend of the realigned Kamira Court.

On a conceptual level, the proposal generally incorporates all of the above outcomes, noting the variations to the Structure Plan previously described and generally supported, including reconfiguration and incorporation of the north south pedestrian link into the park, and reconfiguration of height.





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### 2.5.1. Building Height

The building height proposed is a reconfiguration of that proposed in the UDS, with a portion of the site exceeding the intended heights under the Heights Plan, by increasing from the intended 6-8 storeys, to 8-10 storeys. It is acknowledged that the extension of the neighbourhood park southward has resulted in a smaller development parcel at the southern end of the site and a need to consolidate the intended floor space in a tighter envelope. The proposed building heights apply the transitional principles reflected in the UDS.

As previously discussed in Section 2.3, the reconfiguration of UDS/ DCP building heights in this part of the site should not form grounds for refusal of the proposal, rather the focus should be on whether the reconfigured heights support appropriate levels of solar access to Hilwa Park and that the requirements of SEPP 65/ ADG have been suitably addressed.

### 2.5.2. Activation and surveillance

The preliminary plans show a genuine effort to maximise activation and surveillance of the ground space either through non-residential frontage of a community facility onto the east west link/ retail plaza, or through careful placement of residential frontages fronting the neighbourhood and pocket park and to Kamira Court.

The Proponent advised that car parking is to be provided as a combination of basement parking, sleeved at grade parking and upper level parking. The Proponent advised of the challenges of basement construction in this location due to ground water issues. We have not assessed the technical validity of that approach and focus our attention to the merits of the design approach to overcome this challenge.

The key design issue with at grade and upper level parking is the impacts on streetscape activation and surveillance and visual quality.

City Plan acknowledges the challenges of designing a building that has public frontage to all boundaries. In this regard we consider each frontage in terms of its priority for activation. The highest priority for activation is the east west link on the northern side of the building. The community facility is proposed at ground level with residential units overlooking the public domain on the levels above. This is consistent with the intended outcomes of the UDS.

Providing a suitable frontage to the park is equally important to provide passive surveillance and opportunities for interaction between neighbours. Activation of the ground level with non-residential uses is not necessary adjacent to the park. The Proponent's response is consistent with this and demonstrates thought for establishing a strong visual relationship between dwellings and the park, while providing a 'defensible zone' between ground level units and the park. The indicative designs will facilitate good surveillance, safety and interface management in this regard.

The UDS and DCP seeks to establish a non-residential frontage along Kamira Court to facilitate activation. However apart from the community facility, the remainder of the frontage is residential. While ground floor uses are not entirely unsuitable at ground level in this location and will provide a level of passive surveillance, it misses the opportunity to establish a small active destination or 'cluster' around the proposed pocket park in conjunction with the ground level retail uses approved for 47-53 Pedestrian Mall opposite the site. There may also be land use compatibility issues for ground floor residential uses in this location noting service vehicle movements associated with the future development of 47-53 Pedestrian Mall as well as general public access to the Council owned car park. We would encourage further consideration the tenancies immediately adjacent to the park to accommodate non-residential uses, which offer the potential for activity to spill into the pocket park.

In relation to the at grade and upper level car parking component, the indicative renders and material schedule proposes a continuation of the architectural podium level brickwork and screening to these levels. The are no detailed elevations provided so the assessment of this component of the building is high level. Given the visibility of this façade form Howatt Park, it is essential that Council give focused consideration to this façade and work closely with the Proponent to ensure a visually attractive façade is provided that integrates with the broader architectural program of the development.



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### 3. CONCLUSION

Based on our review of the preliminary scheme provided, we commend the Proponent for their thoughtful approach to the planning and design of this of this important site. It is clear that the Proponent's aim is to maximise the potential for this site to deliver a range of public benefits including affordable housing, new open space high level of connectivity, and places for the community to interact. The proposal will establish new inclusive residential, employment and enjoyment opportunities.

While the scheme proposes some variations of the intended outcome set out in the UDS, it is clear that this has been undertaken with a sound understanding and informed interpretation of the of the underlying principles of the plan.

We recognise that the plans are preliminary and, based on the level of information provided, we generally support the concept as being consistent with the Villawood Town Centre Urban Design Study. As the process evolves, we encourage Council and the proponent to consider the advice provided in this correspondence, which is summarised below:

- A planning proposal that seeks to introduce a supermarket onto the site would be generally consistent with the UDS in that it would establish an anchoring destination west of the existing main street. This is supported subject to the proponent demonstrating there is demand for the facility and it will result in a suitable level of impact in relation to the broader revitalisation objectives of the town centre via an economic impacts statement. It is understood that the Proponent has been working with an economist to consider the broader retail capacity of the centre.
- Any proposal for a supermarket on the site should be accompanied with a site specific DCP that suitably manages the activation of the adjacent public realm and minimises potential for blank walls facing public spaces. It is understood that it is the Proponent's intent for the primary supermarket access to be from the retail plaza, which is supported. Careful consideration is required to all frontage to public space, including the car park.
- We would not encourage rezoning of the site to B2 Local Centre as it would not facilitate the current proposed built form outcomes and may have detrimental impact on the broader revitalisation of the centre. Further consideration needs to be given to the enabling mechanism for a supermarket under the FLEP 2013. While the conclusion of this correspondence is to consider the more flexible approach of establishing an APU and a suitable floorspace limit for the desired use (e.g. shop), we recognise that this is dependent on the conclusions of an economic impact statement, further consideration by Council and potentially consideration for what is the preferred approach of DPIE.
- We strongly encourage Council and the Proponent to work collaboratively to explore the opportunity for contributions towards establishing and enhanced link between the site and Villawood Place via the existing car park, noting that the importance of this link will be amplified by the establishment of a supermarket on the LAHC.
- The reconfiguration of the park and incorporation of the southernmost north south link into the park is supported, as is the incorporation of a small pocket park on Kamira Court. As the various public places to be provided on the site, including the community centre, we encourage the proponent to further explore the site's placemaking potential and the interactions, roles and functions of each of these spaces with the border place making potential of the wider town centre.
- Reconfiguration of building heights is supported provided that Council is satisfied that building height:
  - achieves design excellence pursuant to CI 6.12 of the FLEP 2013
  - is consistent with the building height and FSR standards set out in FLEP 2013; and
  - arrangement of buildings suitably addresses the relevant objectives and design criteria set out under SEPP 65 and the supporting ADG.



Re: Pre Planning Proposal Assessment - LAHC Site -  
Kamira Avenue- Villawood Town Centre  
2-14 Kamira Avenue, Villawood  
22 February 2021

As stated in the assessment above, the inconsistency of building heights in relation to the UDS should not be used as a basis for refusal. This comment is also applicable to the proposed height configuration of Building B (stage 1 proposal).

- In relation to Building B, we encourage Council and the Proponent to closely consider the visual quality of the vehicle access and car parking levels to ensure continuity in the architectural program and a high quality visual response to the sensitive public open space (Hilwa Park) setting of the this façade.
- In relation to Building B and its relationship to the proposed pocket park, we encourage the applicant to consider a non-residential frontage to at least the pocket park noting the development of 47-53 Pedestrian Mall opposite the site will facilitate the creation of a small cluster of active uses that would benefit from a reciprocal approach on the subject site. This will also assist in reducing potential for land use conflicts at ground level in this location.

We trust that the above information will assist the Council and the Proponent in the further consideration of the proposal for this site and in evolving the planning for this important site. Should you require any clarification of the matters raised above, please feel free to contact the undersigned.

Yours Sincerely,

**Helen Deegan**  
Director | Major Projects

**Sonny Embleton**  
Senior Associate | Planning | Urban Design





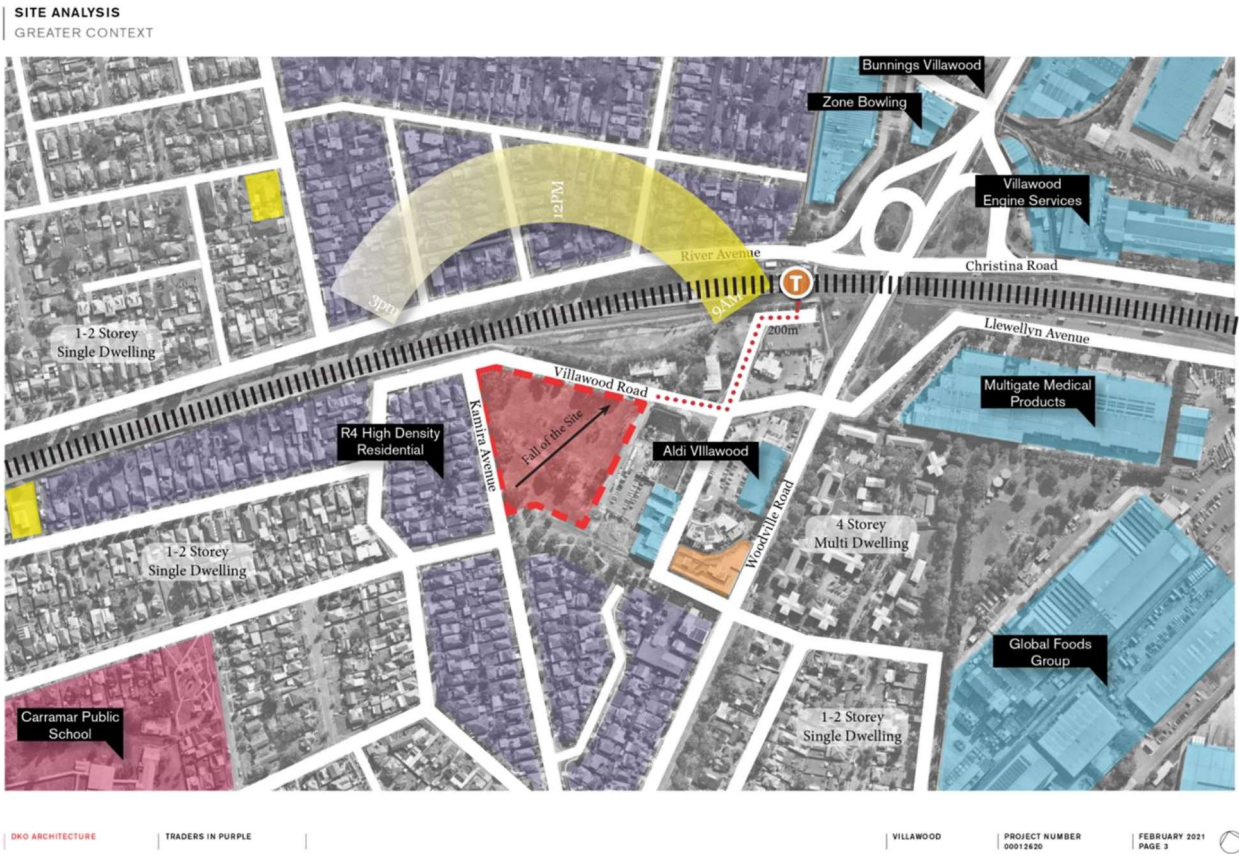
Re: Pre Planning Proposal Assessment - LAHC Site -  
Kamira Avenue- Villawood Town Centre  
2-14 Kamira Avenue, Villawood  
22 February 2021

Attachment A - Proponent Concept









SITE ANALYSIS  
OPPORTUNITIES AND CONSTRAINTS



LEP CONTROLS  
VILLAWOOD TOWN CENTRE LEP 2020



LAND ZONING: R4 HIGH DENSITY RESIDENTIAL



MAXIMUM FLOOR SPACE RATIO: 2.5:1



MAXIMUM HEIGHT: 27m & 39m







MASTERPLAN COMPARISON  
MAXIMUM HEIGHT OF BUILDING AND STOREYS IN VILLAWOOD TOWN CENTRE



VILLAWOOD TOWN CENTRE DCP 2020



PROPOSED MASTERPLAN

DKO ARCHITECTURE

TRADERS IN PURPLE

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MASTERPLAN COMPARISON  
INDICATIVE MASSING DIAGRAM



Figure 22. View of Villawood Town Centre looking north (source LPA)



VILLAWOOD TOWN CENTRE DCP 2020



PROPOSED MASTERPLAN

DKO ARCHITECTURE

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MASTERPLAN COMPARISON  
ACTIVE STREET FRONTAGE AND PEDESTRIAN CONNECTIVITY



VILLAWOOD TOWN CENTRE DCP 2020



PROPOSED MASTERPLAN



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A COMMUNITY APPROACH  
DESIGN VISION



FOSTERING SENSE OF COMMUNITY



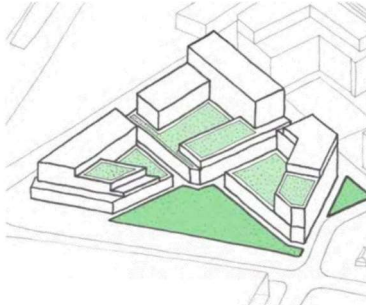
DELIVERING HIGH QUALITY SOCIAL AND  
AFFORDABLE HOUSING



HIGH QUALITY PUBLIC AMENITY



RETAIL OFFERING FOR THE LOCAL COMMUNITY



A CONSIDERED URBAN DESIGN RESPONSE



HUMAN SCALE PEDESTRIAN CONNECTIONS

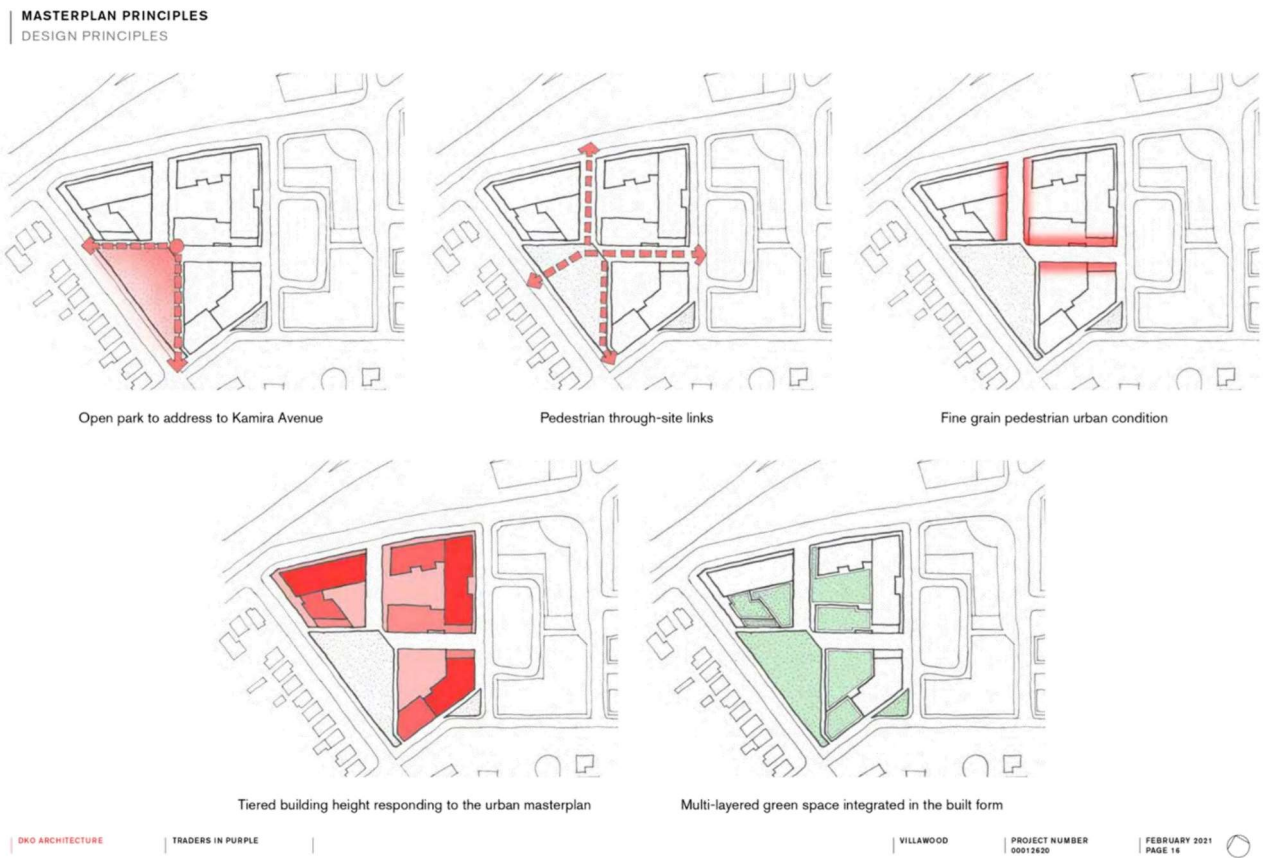
DKO ARCHITECTURE

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PROPOSED MASTERPLAN



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STAGE 1



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PROPOSED MASTERPLAN  
STAGE 1



DKO ARCHITECTURE

TRADERS IN PURPLE

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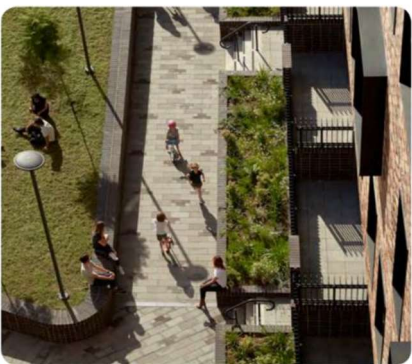
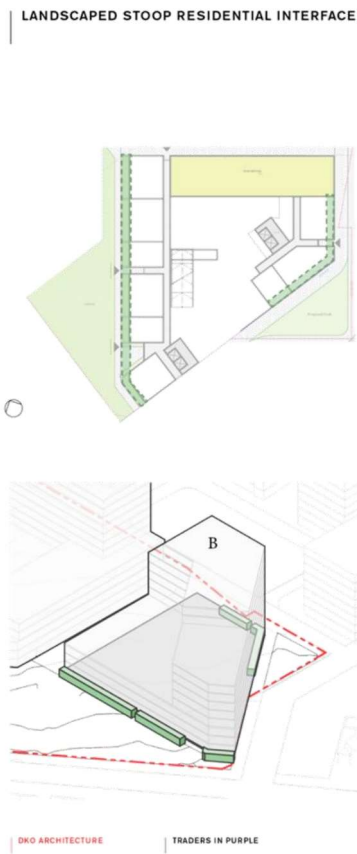
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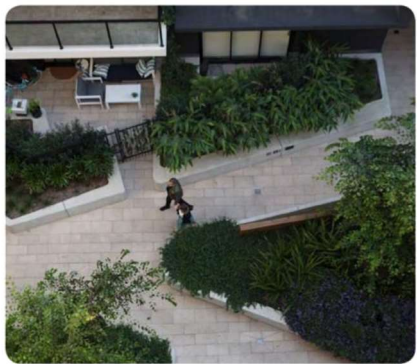
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01. Arkadia, Alexandria



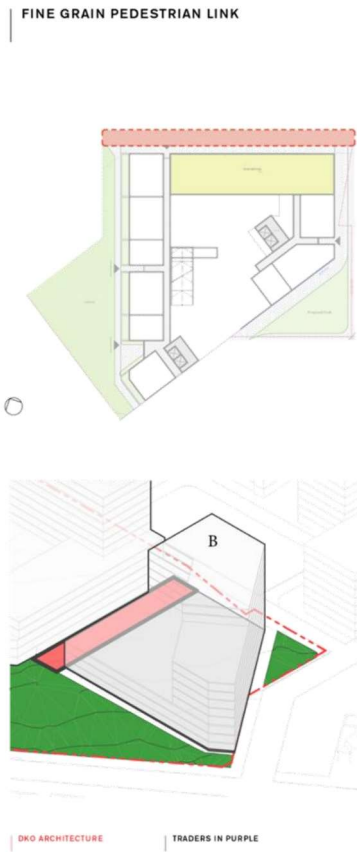
02. Eve, Erskineville

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01. Clarendon Gas Works, London



02. Nya Eriksberg, Sweden



03. Tibble 2.0, Sweden



04. 95 Peckham Road, London

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COMMUNITY HUB




01.

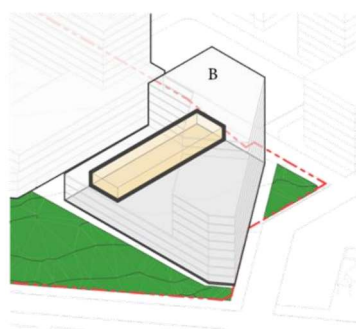


Commercial Kitchen


02.



Child Care




03.



Mens Shed

04.



Subsidised Hairdresser

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TRADERS IN PURPLE

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COMMUNAL OPEN SPACE




DKO ARCHITECTURE    TRADERS IN PURPLE


01. Passive Seating (Outdoor Workhub)




02. Meet & Gather



03. Wellness



04. Grow & Eat



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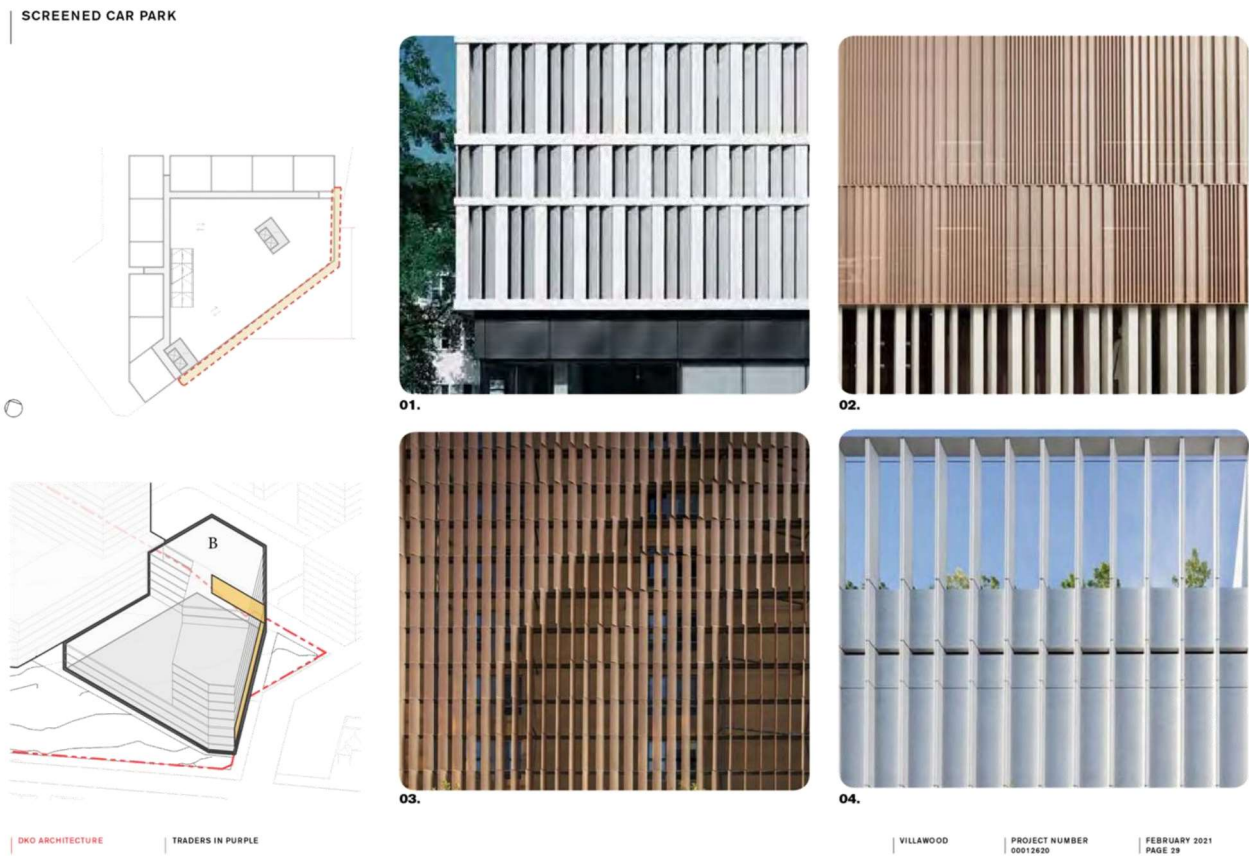


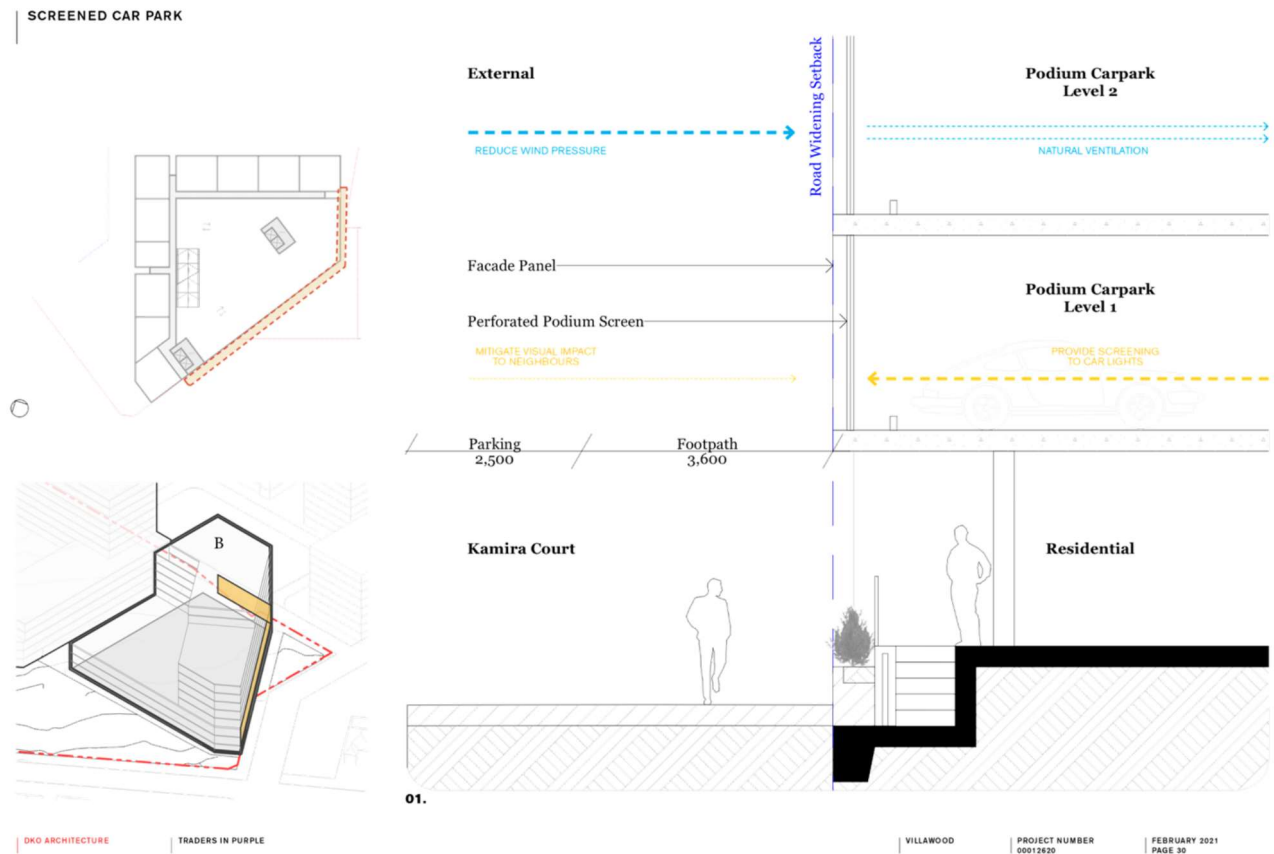


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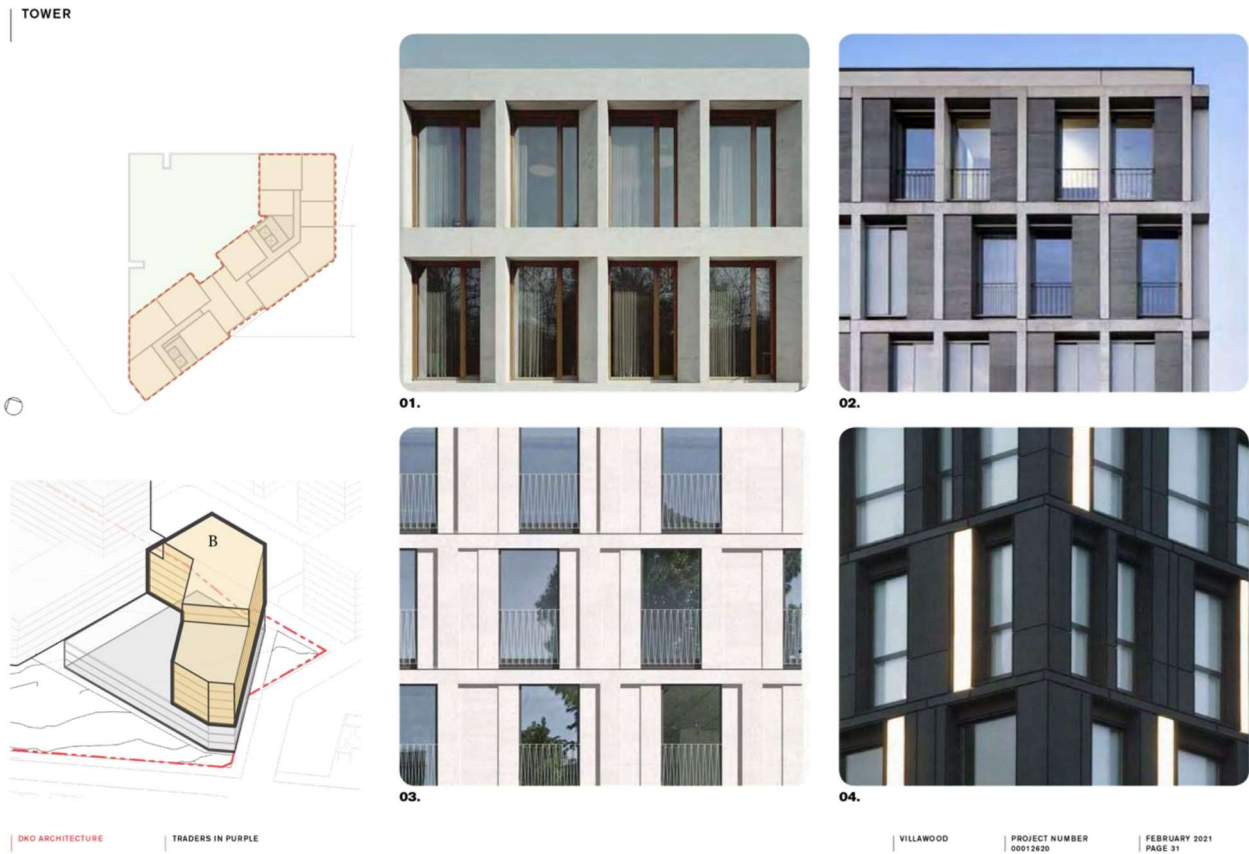




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RENDER VIEW 01



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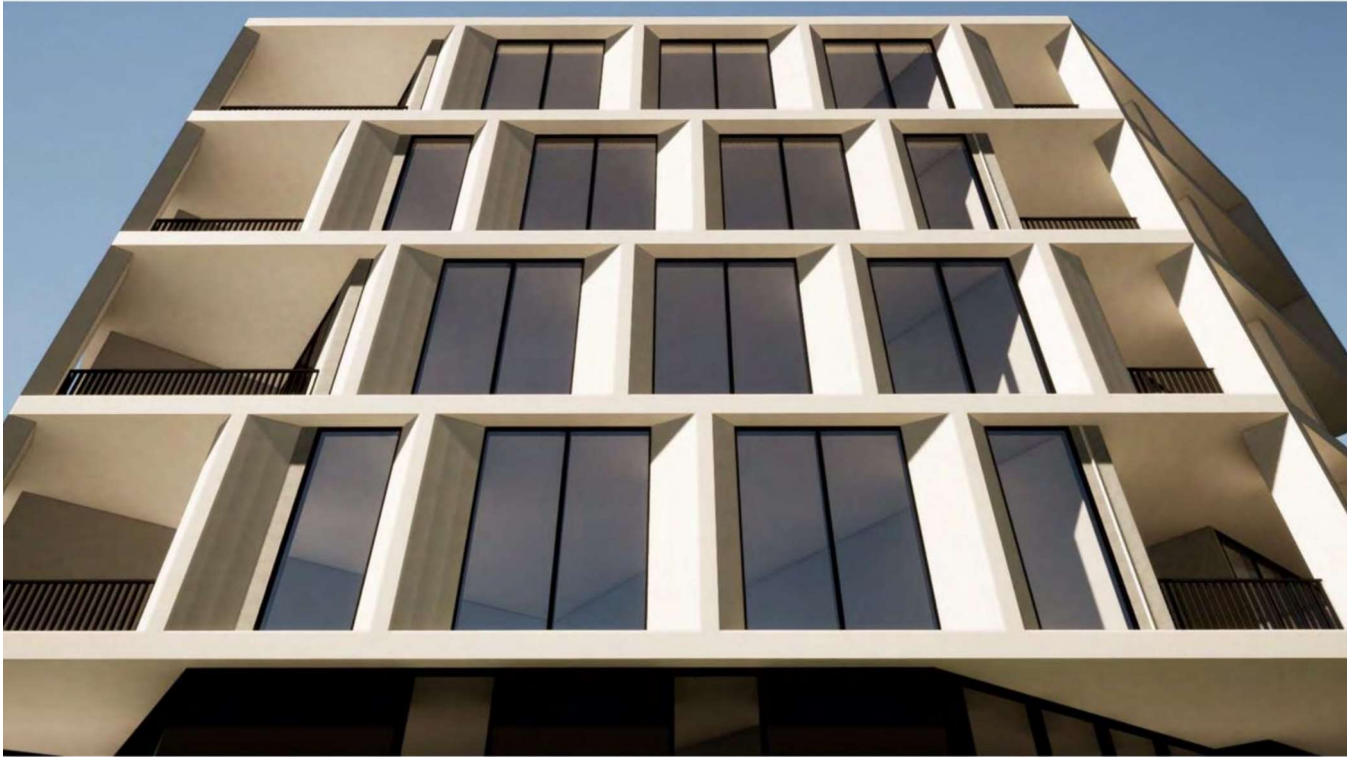


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RENDER VIEW 02  
TOWER



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RENDER VIEW 03  
SCREENED CAR PARKING



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STAGE 1 - BUILDING B  
LEVEL 1



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STAGE 1 - BUILDING B  
LEVEL 2



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STAGE 1 - BUILDING B  
LEVEL 3



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STAGE 1 - BUILDING B  
LEVEL 4-7



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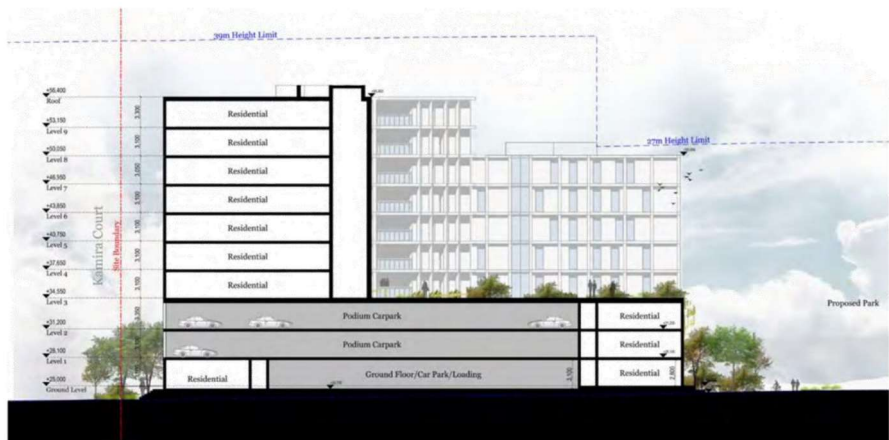
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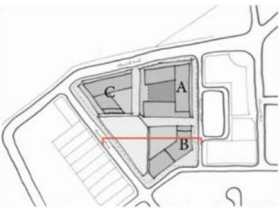
Peer Review for Urban Design Assessment



STAGE 1 - BUILDING B  
SECTION



01. Building B and the Proposed Park





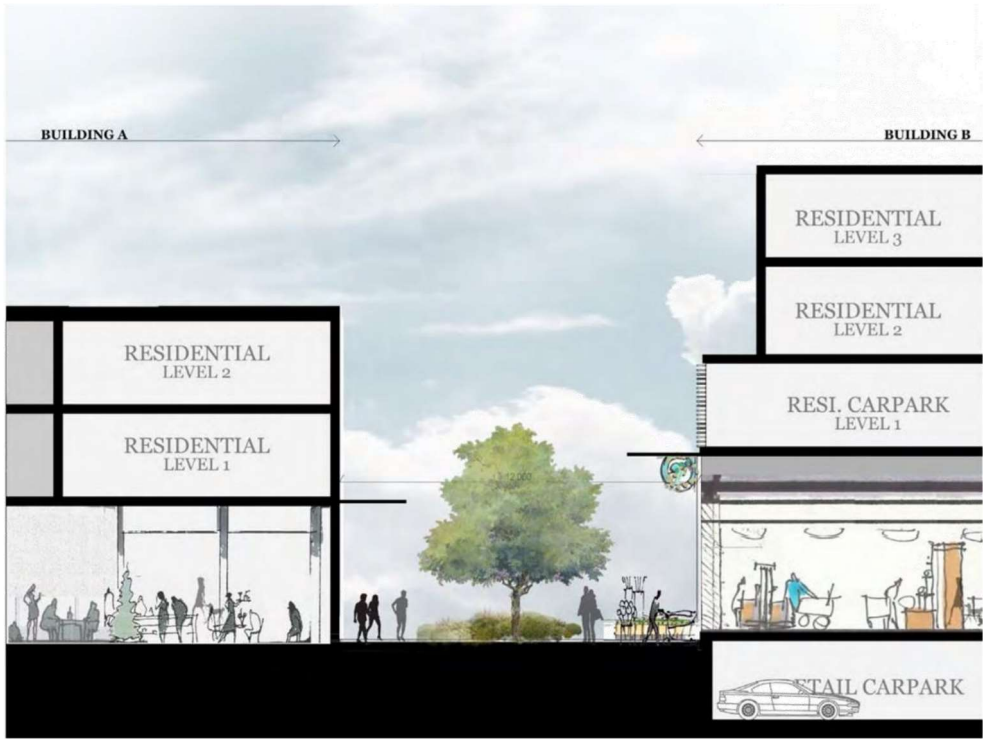


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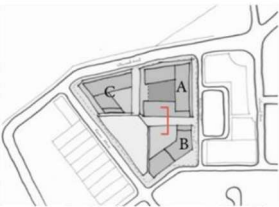
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STAGE 1 - BUILDING B  
INTERFACE SECTION



03. Building B and the Pedestrian Link



DKO ARCHITECTURE

TRADERS IN PURPLE

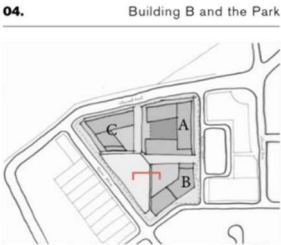
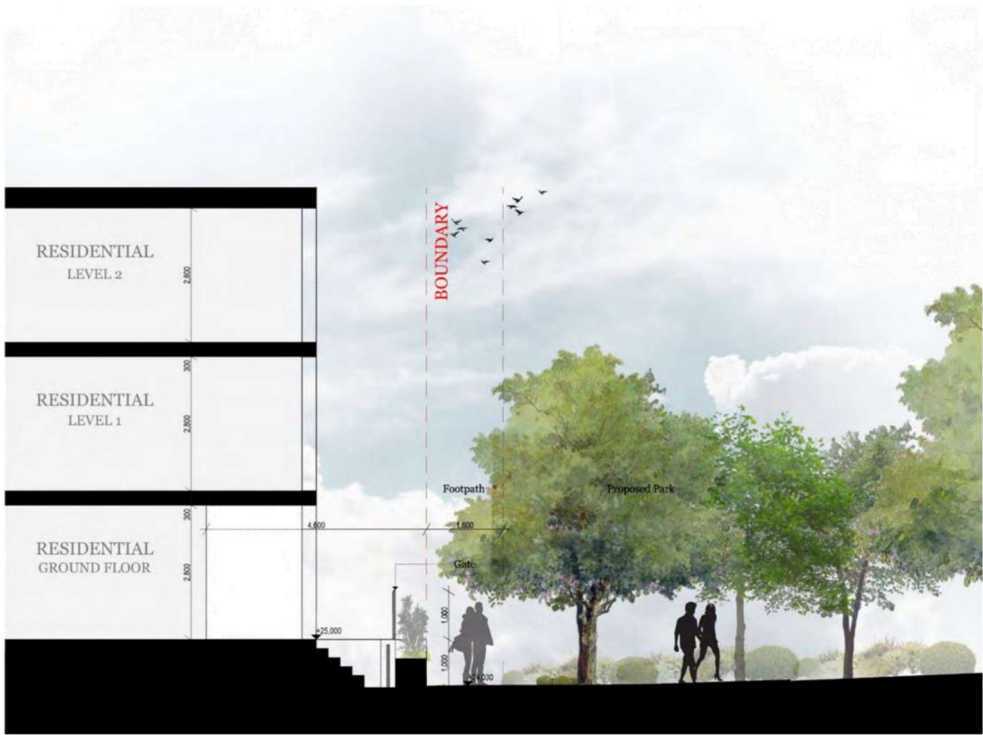
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STAGE 1 - BUILDING B  
INTERFACE SECTION



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STAGE 1 - BUILDING B  
ADG SOLAR



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STAGE 1 - BUILDING B  
ADG CROSS VENTILATION



ADG  
Cross-Ventilation  
Calculation

Building B

Cross-Ventilation

63/105  
60%

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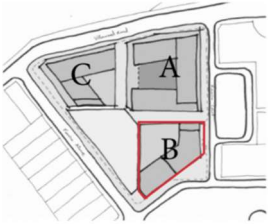


ATTACHMENT D

DEVELOPMENT SUMMARY  
BUILDING B

LAHC Villawood - Stage 1  
Building B  
Base FSR 2.5  
Development Summary

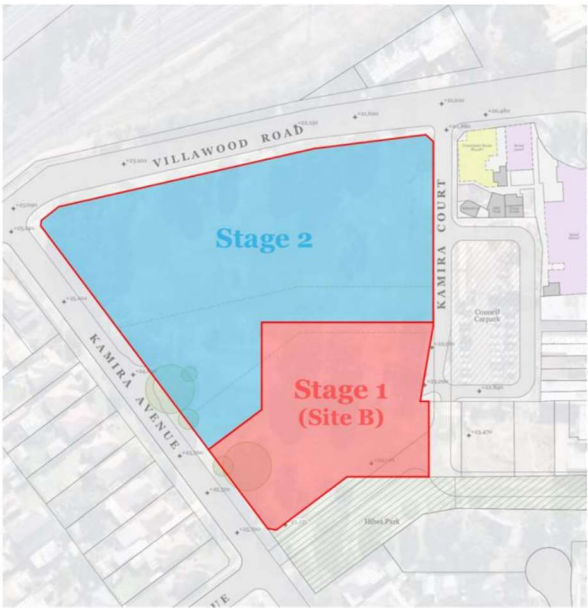
Evolve - Private/Affordable							LAHC - Social Housing				Building B Total								Non-Retail		TOTAL	
											Building B											



FSR CALCULATION  
BUILDING B



FSR: **2.5:1**  
Max GFA: **40,805m²**



**Stage 1 (Site B)**  
Site Area: **5,150m²**  
Bonus AHSEPP FSR: **0.5:1**  
Max GFA: **15,450m²**

Max FSR: **2.5:1**  
 $5,150 \times 2.5 = 12,875m²$   
Bonus AHSEPP FSR: **0.5:1**  
 $5,150 \times 0.5 = 2,575m²$

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