

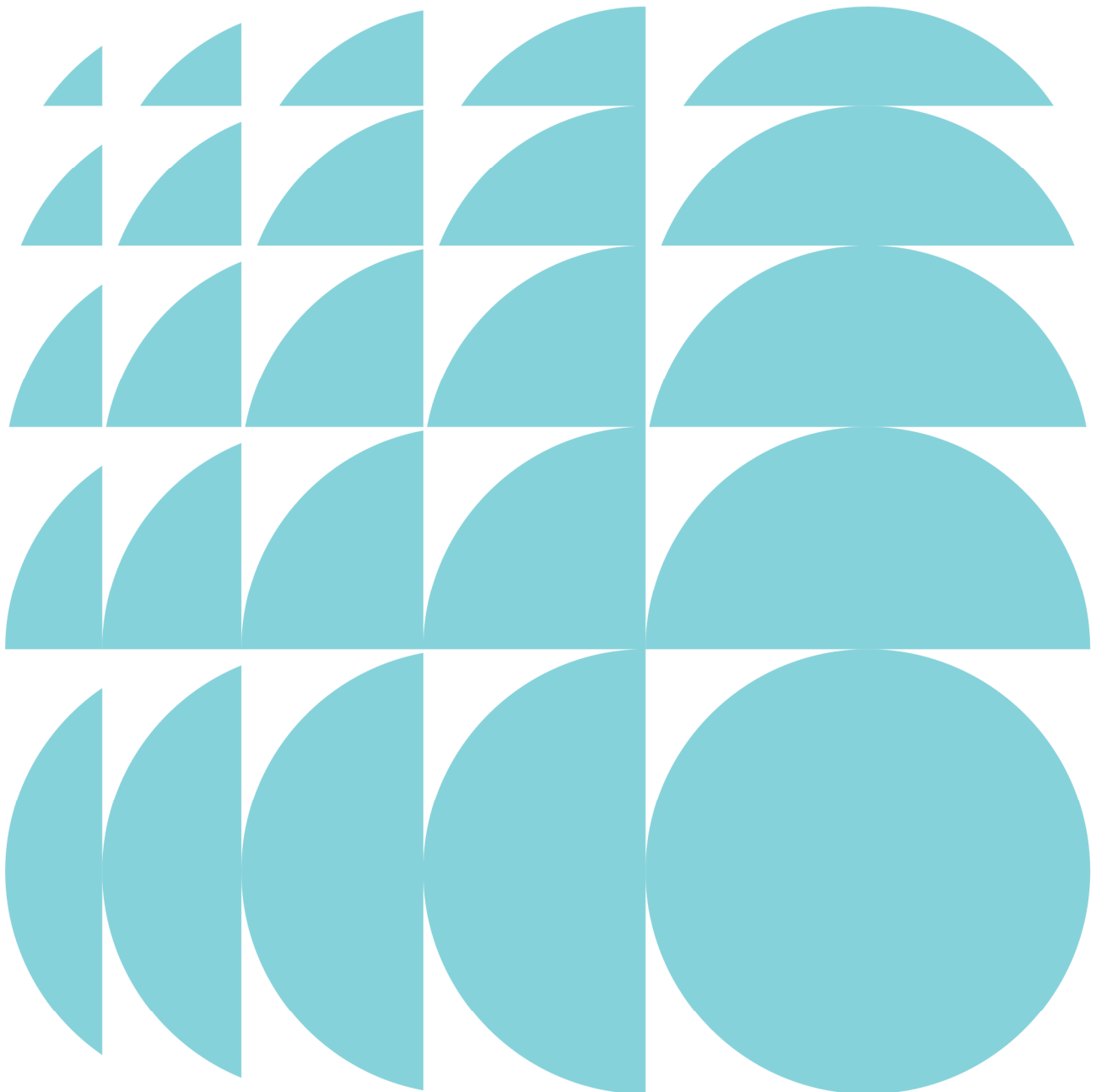
# ETHOS URBAN

## Request for Additional Information

Edmondson Park Frasers Town Centre  
Residential Precinct 1 (Stage 1 Built Form)

Submitted to Liverpool City Council  
On behalf of Frasers Property Australia

01 February 2018 | 15895



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## 1.0 Introduction

This response has been prepared regarding DA-779/2017 for the construction of 104 residential dwellings including townhouses, terrace and studio dwellings, car parking for 172 vehicles, construction of Mews 3, subdivision of land, landscaping and public domain improvements at Edmondson Park Frasers Town Centre (the site).

Council has provided three separate pieces of correspondence:

- Letter dated 21 November 2017 outlining matters raised by the Sydney Western City Planning Panel (SWCPP) at the initial Council briefing.
- Letter dated 30 November which outlines a range of issues raised by Council's Design Excellence Panel.
- Letter dated 22 December 2017 which identifies additional information required to be provided to enable further assessment of the DA.

This response has been structured to specifically respond to Council's issues and the SWCPP preliminary issues letter. A separate response and process will be undertaken for the issues that have separately been raised by the DEP.

Frasers would like to express its serious concern that some of the comments that have been provided as part of the assessment process to date do not show appropriate consideration of the approved Concept Plan and supporting assessment framework applicable to the Development Application (DA), including the terms of the Concept Plan approval (and Statement of Commitments), the Design Guidelines and Public Domain Plan. Further, it is noted that Council has already reviewed and considered these issues as part of approving the Display Village (DA621/2016) which is currently under construction to deliver a typical strata block and associated dwelling typologies within the Residential Precinct.

As outlined at Section 2.1 of the SEE the Concept Plan has been modified to incorporate the winning concepts of the bid process and bid requirements of the NSW Government (Urban Growth). This has been a three-year process involving a range of stakeholders including the Department of Planning and Environment (the Department) and Liverpool City Council (Council) during which detailed assessment of the indicative scheme was undertaken.

The Concept Plan specifically establishes the layout, structure, built form principles and public domain principles for the Residential Precinct, as proposed by this DA, in order to agree the planning framework and outcomes for future DA's upfront. As a result, where addressed and approved by the Concept Plan, there is no requirement for further assessment as part of any future DA.

After a lengthy and extensive period of consultation the Concept Plan modification was approved by the Planning Assessment Commission (PAC) with the support of Council and the Department. It establishes key planning framework for the Town Centre and approved the Design Guidelines and Public Domain Plan.

The Design Guidelines is the principle guiding document for the structure and built form of the Town Centre. The Public Domain Plan is the key guiding document for the layout and structure of the public domain, including the streets, mews, pocket parks and public open space. Condition 1.3 (c) and 1.3 (d) of the Concept Plan approval require each DA to demonstrate consistency with the Design Guidelines and Public Domain Plan. Importantly, both documents were discussed, in some detail, with Council and the Department prior to being incorporated into the Concept Plan. The DA has been prepared on this basis and is generally consistent with the Design Guidelines and Public Domain Plan.

In accordance with Schedule 6A, Clause 3B (Transitional arrangements—repeal of Part 3A) of the EP&A Act, the consent authority must not grant consent under Part 4 for the development unless it is satisfied that the development is generally consistent with the terms of the approval of the concept plan.

As Council is aware, its role is to undertake an assessment of the DA within the statutory framework that applies to the site. We are concerned that the comments raised by the SWCPP and DEP do not correspond to the statutory framework that applies to the site and is inconsistent with the findings of the Department and the PAC in approving the Concept Plan. Therefore, whilst some of the views expressed in the correspondence may not be shared by



Council, it is important that Council guide the SWCPP and DEP in relation to the history of the project and the statutory framework that applies to all future development.

As noted above, significant work has been undertaken by local and state authorities throughout the Concept Plan modification to establish principles of development and provide a clear planning assessment framework that applies to the site. This provides certainty to Frasers, Urban Growth, local and state authorities and the community as to the form and function of development that will take place at Frasers Edmondson Park Frasers Town Centre.

The Frasers design is a thoughtful and high quality outcome that will deliver density without scale in Edmondson Park. The high quality outcome is reflected in the Artist impressions that allow a sense of the unique Residential Precinct that will be delivered.



Residential Precinct Mews





Townhomes viewed from the Local Park



Townhome side elevation view





Townhomes viewed from Greenway



Townhome Courtyard





Townhome Courtyard

## 2.0 Response to Council Comments

### 2.1 Compliance with MP 10\_0118 MOD 4 Conditions of Approval

***The proposed development is considered is not consistent with the conditions of approval for MOD - 4. Accordingly, the following conditions are required to be appropriately addressed by the applicant:***

- i. Condition 1.14 requires the submission of a Heritage Interpretation Strategy with the subject DA. This shall be submitted for assessment by Council's Heritage Advisor.***

A Heritage Interpretation Strategy was prepared by TKD Architects in support of DA628/2016 (**Appendix F**). The strategy applies to the broader Edmondson Park Frasers Town Centre site and includes themes and a conceptual approach for the interpretation of the Town Centre site. Whilst the DA does not propose specific interpretation measures as part of the DA, approval for the detailed design of any interpretation elements will be undertaken at an appropriate time consistent with the Public Art Plan. It is expected that this will form part of a condition of consent.

### 2.2 Statement of Commitments

- 1. Commitment No.12 (dwelling yield plan) is not considered to have been appropriately addressed as part of the subject DA.***

The minimum dwelling yield plan (**Appendix H**) was included in the original Edmondson Park South Concept Plan to match the similar plans that were in Council's LEP at the time, in order to ensure appropriate densities were achieved in greenfield areas, particularly surrounding the train station.

MOD 4 amended the Dwelling Yield Plan to specifically reflect the increase in dwellings up to 1,884 proposed in the Frasers Town Centre. That number was based on the indicative design that was lodged with the Concept Plan and was then translated into the Design Guidelines and Public Domain Plan. This DA delivers the first 104 dwellings on the site in a manner consistent with the Design Guidelines and Public Domain Plan, which is required to achieve the nominated target on the yield plan. Therefore, the proposed development is capable of achieving the target yield for the Town Centre.

Further, it should be noted that amendments to the arrangement and layout of the Townhome product as suggested by Council, the SWCPP and DEP would reduce the yield of the residential precincts which would in turn prevent the achievement of the approved yield and satisfaction of Commitment 12 of the Concept Plan.

- 2. Commitment No.13 (landscape strategies) is not considered to have been appropriately addressed as part of the subject DA.***

The relevant landscape strategies are listed at Section 04 of the Visual Assessment (provided for information at **Appendix I**). The landscape strategies were not specifically amended as part of Mod 4, but were in part superseded by the changes in that Modification which included the introduction of the Public Domain Plan which provides a greater level of detail for landscape strategies. Nevertheless, the DA is consistent with the strategies as follows:

- Planting of significant vegetation surrounding the Town Centre will soften the Town Centre edge and green corridors are provided within the Town Centre. Parts of these are delivered by this DA and others will be delivered by others DA's including DA1260/2016 and future stages.
  - Building heights facing Bernera Road are within the height limit and up to 3 storeys high.
- 3. Commitment No.14 (Campbelltown Road trees) is not considered to have been appropriately addressed as part of the subject DA.***

Commitment 14 relates to the Campbelltown Road reserve and adjoining ridge line which is not the subject of this DA. Removal of trees from across the site was approved by DA628/2016. Planting adjacent to the Campbelltown corridor is addressed by DA583/2017. Planting within the road reserve is the responsibility of RMS.

- 4. Commitment No.23 (parking coordination) is not considered to have been appropriately addressed as part of the subject DA.***

Car parking within the Townhome buildings is centrally located within a communal garage shared by all residents, whilst a co-located garage is provided for terrace and studio homes, reducing duplication of parking infrastructure. This allows the streets to be predominantly faced by active residential uses and more space to be provided for Mews resulting in a walkable and liveable environment.

The Residential Precinct contains one land use, residential. Sharing car parking between multiple land uses will be achieved within the Town Centre.

**5. Commitment No.25 (embedded energy network) is not considered to have been appropriately addressed as part of the subject DA.**

Real Utilities has prepared a response outlining the proposed embedded energy network to satisfy this commitment (**Appendix L**). Attached at **Appendix M** is the sub-division plan included within DA-779/2017 which shows (G) Easements for Real Utilities (Embedded Network), which is not required on proposed public roads but shown on private mews roads and within strata blocks.

**6. Commitment No.34 (community garden) is not considered to have been appropriately address as part of the subject DA.**

This commitment relates to the broader Edmondson Park Concept Plan site and the community garden will be provided by Urban Growth in a location outside of the Frasers Town Centre. Commitment 34 was specifically amended as part of Concept Plan (Mod 4) in order to identify that Urban Growth is responsible for this commitment.

**7. Commitment No. 71A (affordability) is not considered to have been appropriately addressed as part of the subject DA. The applicant is required to demonstrate how they will meet the target of dwellings within a range of price points and for moderate income housing. The applicant shall also confirm where within the FTC the affordable dwellings will be located (i.e in the town centre core or the residential precincts).**

Affordable dwellings will be available in the Town Centre and Residential Precincts. Frasers has undertaken an analysis of the affordability benchmark for moderate income housing at Edmondson Park to inform this commitment (refer to **Appendix G**). This is a rolling target for Frasers across the entire Town Centre development, to be tracked by an annual audit. Frasers would be happy for this to form part of a condition of consent utilising the commitment wording, ie. *Prior to the issue of the relevant Occupation Certificate the proponent must provide Council with the annual audit demonstrating how it has performed against its commitment to provide dwellings within a range of price points within Edmondson Park Frasers Town Centre, including 15% of dwellings suitable for purchase as moderate-income housing (defined as 80% to 120% of the median gross household income in the Greater Sydney Region).*

## **2.3 Edmondson Park Frasers Town Centre Guidelines**

### **1. Council Comment**

#### **Design Excellence**

A separate response will be prepared to address the comments received by the DEP.

### **2. Council Comment**

#### **Principles**

- **High quality residential accommodation is provided at a range of medium to high densities**

***The proposed development does not provide a high quality level of residential accommodation and amenity, especially where some dwellings have been designed without the ability for cross-through ventilation, where there is inequity of access to POS areas and there is significant concerns raised over privacy between rear facing dwellings. This is not considered to be acceptable for a greenfield development of this nature. It is also considered that the at-grade car parking design is exacerbating the issues listed above and this form of parking will not be the best outcome in ensuring high quality residential accommodation in the residential precincts. The applicant is required to adequately demonstrate how the above principle of the TCG have been achieved by the proposal in the context of these issues.***

### 2.3.1 Consistency with Design Guideline Principles

It is important to recognise that whilst this site is technically a ‘greenfield’, it is unique in that it is designated as a town centre around public transport infrastructure. Accordingly, it is appropriate that a density is achieved beyond a typical greenfield site. The townhome residential typology is effectively a hybrid between residential flat buildings and townhouses, which achieves increased density without scale. It is therefore not appropriate to set the same amenity standards for these dwelling as typical town houses, which is why the Design Guidelines were prepared with their own specific performance criteria and design solutions for the typology. As part of its assessment and approval of the Design Guidelines the Department had specific regard to the Draft Medium Density Design Guide and where appropriate required the Design Guidelines to adopt certain criteria, and in other instances did not require it.

As part of its assessment of the Concept Plan the Director General’s Environmental Assessment Report stated:

*“The Design Guidelines include numerical amenity guidelines for the various dwelling forms in the Residential Precinct. The Department considers the numerical guidelines (as amended) will ensure a high level of amenity.”*

Application of the Design Guidelines is set out at Section 1.5. It states:

*The vision and principles represent the overall outcomes for the site.*

*Performance criteria are consistent with and provide further detail on the vision and principles.*

*They address matters that are considered important to achieving quality development outcomes on the site.*

The design solutions represent the preferred way of demonstrating achievement of the performance criteria. Where this DA adopts a design solution, Section 1.5 of the Design Guidelines states that it will be taken that the DA has achieved the relevant performance criteria – and the design solution is consistent with the vision and principles as stated above.

To achieve a quality development outcome and to deliver high quality residential accommodation Frasers has adopted all design solutions for Multi-dwelling housing (Townhomes) – Design Solution DS9.1, Attached Dwellings – Design Solution DS10.1 and Studio Dwellings – Design Solution DS11.1 including:

- *Building height, setbacks and separation;*
- *Provision of open space;*
- *Provision of landscaping and private open space;*
- *Dwelling sizes;*
- *Storage;*
- *Solar access targets;*
- *Environmental sustainability targets; and*
- *Provision of car and bicycle parking.*

Accordingly, by adopting the design solutions the DA has achieved the performance criteria and is consistent with the vision and principles, including delivery of high quality residential accommodation.

Further assessment of the specific items raised by Council is provided below.



### 2.3.2 Car Parking

The Townhome product has always featured at-grade car parking as demonstrated by the Residential Precincts Design Report and Illustrative Design Scheme approved as part of the Concept Plan (**Appendix E**). Accordingly, the at-grade parking is a defining feature of the Townhome product approved by the Department and PAC and inclusion of a basement would be a contravention of the Concept Plan (refer to **Figure 1** and **Figure 2**).



Figure 3: Indicative typical Block Ground Floor

**Figure 1 Illustrative Design of the Townhome at-grade car park**

Source: Residential Precinct Design Report and Illustrative Design Scheme



**Figure 2 Ground Level design of Townhome as submitted with the DA**

Source: GSA



Nonetheless, provision of a basement beneath each town home typology would have a significant impact to the affordability of homes. Frasers are committed under the Concept Plan to delivering dwellings within a range of price points within the Residential Precinct, including 15% of dwellings suitable for purchase as moderate-income housing (defined as 80% to 120% of the average income across NSW). This is commitment 71A of the Statement of Commitments. Excavation works to form a basement would add unacceptable costs to the project as this cost would raise the purchase price for each dwelling and prevent delivery of affordable homes in this key location.

Further, if basements were provided, and the rear private open space was relocated to ground level, it would not be possible to deliver the approved townhome residential typology of dwellings above the ground level dwellings, as they would not have access to appropriate private open space as the remaining space would be shared between all dwellings, including those at ground level. Alternatively, the ground level dwellings could be removed, however this would then reduce the density of the residential precincts which would undermine the intent of the Concept Plan, to achieve an appropriate density and transition in scale from the Town Centre Core to the lower density residential beyond, and, as discussed in Section 2.2 above, would prevent the achievement of the required density in Commitment 12 of the Concept Plan.

In addition, inclusion of a basement car park would necessitate inclusion of a stairwell to the ground level which would prevent delivery of silver level universal design dwellings within the product. Discussion of accessibility is further addressed below.

Accordingly, and in addition to the responses above, amendment of the Townhome product would be in-consistent with the Concept Plan and findings of the Department and PAC in approving the Concept Plan.

### **2.3.3 Equity to private open space**

Multi-dwelling housing is not subject to the requirements of SEPP 65 which would typically require each floor of a building to be accessible. Whilst SEPP 65 is not relevant Frasers has included a 20% target for universal housing across the Town Centre that is otherwise not required by the Building Code of Australia (BCA) or Disability and Discrimination Act (DDA) in the Residential Precinct.

Ranges of dwelling types are available in the housing typologies that would be attractive to a range of lifestyle and home-style choices, including for those with varying degree of mobility. Low mobility residents may find the ground floor typology more attractive than the multi-level housing. Equally multi-level housing may be more appealing to younger families than those with mobility issues. It is noted that the recommended traditional terrace housing is multi-level housing that does not improve vertical circulation for those with mobility issues.

The DA has been prepared consistent with relevant legislation. All buildings are accessed from the ground floor which meets accessible requirements to the front door and ground floor units are typically silver level universal design dwellings. All private open spaces at the first floor are only accessible by the occupants of the multi-level housing. Equity to the private open space is not a consideration under relevant legislation. Equity of access to common areas is a relevant consideration; however, the townhome product does not contain any common area other than the car park and resident parks which are both at Ground Level. Assessment of accessibility to common areas was undertaken by Morris Godding Accessibility Consultants at Appendix N of the SEE.

### **2.3.4 Ventilation**

Whilst the Design Guidelines do not contain a requirement for cross ventilation, all units on Level 1 and 2 achieve cross ventilation; this equates to 80% of dwellings in the town home product being fully cross ventilated. This is a significantly high proportion of dwellings.

Careful consideration was undertaken during the design of the townhome product to the ability of ground floor units to be capable of natural ventilation. Accordingly, the habitable rooms of ground floor dwellings have a shallow depth (5m) which will maximise ventilation and air flow to the unit. This is only exceeded in the kitchens where the room extends to 6m to the kitchen joinery. All units have openable doors and large adjustable and openable windows that maximise natural ventilation and airflow opportunities.

Should a traditional terrace be provided then it would not be possible to deliver a one bedroom product on the ground floor, further restricting diversity of housing in the Residential Precinct.

Notwithstanding that the townhome product is fully compliant with the Concept Plan and Design Guidelines that apply to the site, the natural ventilation amenity afforded by the design is extremely high. 80% of dwellings are fully cross ventilated and all other units receive adequate natural ventilation. As discussed above, it is not appropriate to apply the same amenity standards that might ordinarily apply to a lower density greenfield site. The proposed provision of 80% is 20% higher than the standard established for a residential flat building, which is also permissible in the zone.

Should Council seek further ventilation Frasers will include mechanical ventilation of those one-bedroom homes that are naturally ventilated but are not fully cross-ventilated.

### 3. Council Comment

- ***Design of residential accommodation, in particular in mixed use settings, provides for a high level of amenity, including solar access, visual and acoustic privacy***

***The proposed development does not provide a high quality level of amenity, especially where there is significant concerns raised over privacy between rear facing dwellings; visual and acoustic. It is advised that the separation distances between rear facing dwellings be increased to ensure a high level of amenity, especially ensuring adequate privacy is provided for future occupants.***

#### 2.3.5 Privacy and Separation

Assessment of the Townhome product was undertaken by the Department and PAC as part of the Concept Plan, including consideration of separation between buildings, across the internal courtyard and the suitability of private open space. In approving the Concept Plan the Department planner assessment report stated:

*“The Design Guidelines include numerical amenity guidelines for the various dwelling forms in the Residential Precinct. The Department considers the numerical guidelines (as amended) will ensure a high level of amenity.”*

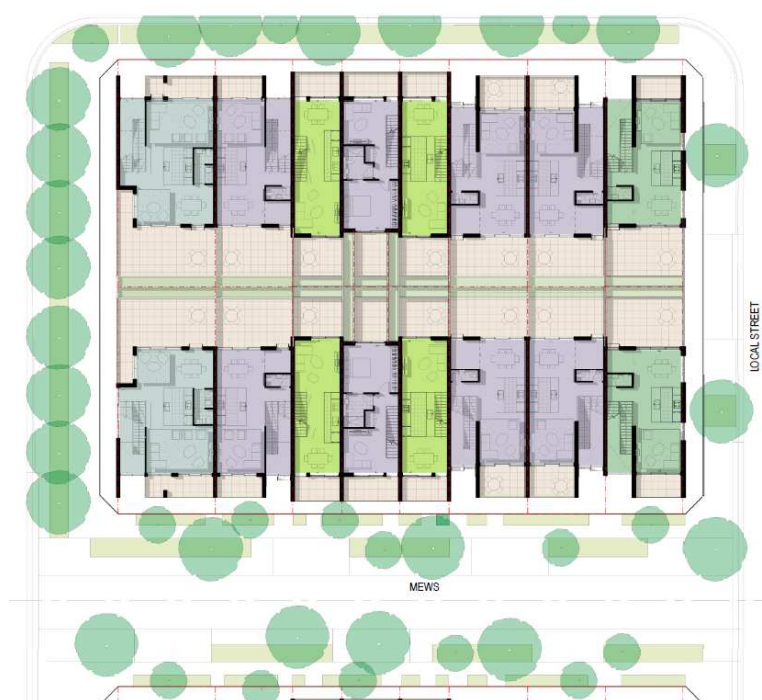
and

*“The Department is satisfied with the proposed housing densities and typologies. The proposed density in the Residential Precinct is 43 dwellings per hectare. This is consistent with the draft Medium Density Design Guide 2016’s (DPE) expectation that medium density housing will typically result in a density of 25-45 dwellings per hectare.*

*The proposal increases housing supply and through the concept design, Design Guidelines and Public Domain Plan, demonstrates a commitment to providing diverse and well-designed housing and public spaces accessible to different life stages and budgets.”*

The Design Guidelines provided design solutions to deliver the built typology of the Illustrative Design Scheme (**Appendix E** and **Figure 3**). The design solutions are the preferred way to demonstrate achieving the performance criteria and therefore are consistent with the vision and principle to provide high levels of amenity including visual and acoustic privacy. The illustrative scheme demonstrated how high level of amenity is delivered for the Townhome product – and all Residential Precinct typologies. The design solutions approved under MOD 4 demonstrate how this is achieved. The DA has adopted all design solutions to deliver high amenity for residents as delivered by the design solutions.

A comparison of the approved illustrative design scheme and the proposed layout of the Townhome product is provided at **Figure 3** and **Figure 4** that demonstrates the design remains consistent with that approved by the Concept Plan.



4: Indicative typical Block First Floor

## INDICATIVE BLOCK FIRST FLOOR

These townhomes have a variety of two, three and four bedroom configurations with their primary outdoor private space to the rear over the car parking as well as balconies facing the Mews. The first floors typically have a flow through living, dining, kitchen area to maximise the utilisation of both these private open space areas.

### Indicative First Floor Layout



Figure 5: Indicative typical Block Second Floor

## INDICATIVE BLOCK SECOND FLOOR

The upper floors are typically where the bedrooms are located.

In order to provide privacy and shading to the bedrooms as well as the main private open space, the use of architectural and landscape elements will be incorporated.

Where possible windows looking into private open spaces will be offset to improve the privacy.

### Indicative Second Floor Layout

## Figure 3 Townhome Illustrative Design Scheme approved by the Concept Plan

Source: Residential Precinct Design Report and S75W Illustrative Design Scheme





Submitted DA – First Floor Layout



Submitted DA Second Floor Layout

**Figure 4 Proposed Design layout of Townhome**

Source: RP1 Stage 1 Design Report (GSA)

It is important to recognise that whilst this site is technically a 'greenfield', it is unique in that it is designated as a town centre around public transport infrastructure. Accordingly, it is appropriate that a density is achieved beyond a typical greenfield site. The townhome residential typology is effectively a hybrid between residential flat buildings and townhouses, which achieves increased density without scale. It is therefore not appropriate to set the same amenity standards for these dwelling as typical town houses, which is why the Design Guidelines were prepared with their own specific performance criteria and design solutions for the typology.

Amendment to the separation distances, including increasing them beyond the requirements of the Design Guidelines would be a contravention of the Concept Plan and prevent Frasers delivering the yield and housing (including affordable housing) at the density approved and required by the Concept Plan.

Nevertheless, a review of relevant requirements of Table 3 of the Design Guidelines is provided below that demonstrates the separation requirements have been achieved and exceeded by the DA and all units receive larger private open space and greater separation between apartments than required by the Design Guidelines, ensuring a higher level of amenity is afforded to residents than is required by strict compliance with the design solutions.

Element	Design Guideline	Proposal
Rear Setback (Level 1 courtyard)	Where above ground level, 3.5m minimum from the rear boundary to the wall of the dwelling	Between 4m-4.5m
Internal Separation	The minimum internal separation between windows facing across courtyards above car parking is 8m	Between 8.1m and 9m
Landscaped Area	Upper level townhomes are to provide a minimum landscaped area of 1m <sup>2</sup> within their front entry courtyard and a planter bed (on structure) with a minimum depth of 600mm along their rear courtyard boundary.	Minimum 1m <sup>2</sup> landscaped area and planter bed with 600mm depth provided in rear courtyard area.
Private Open Space	Where for a <b>1 bedroom dwelling</b> , 10m <sup>2</sup> minimum area	<b>18-20sqm</b>
	and 2.5m minimum dimension	2.5m – 2.8m
	Where for a <b>2 bedroom dwelling</b> , 12m <sup>2</sup> minimum area	Town Home Type 4 2 bedroom Ground: min 11m <sup>2</sup> Level 1: min 19m <sup>2</sup> Level 2: min 1m <sup>2</sup> <b>Total: 31m<sup>2</sup></b>
	and 2.5m minimum dimension	3.8m
	Where for a <b>3 bedroom dwelling</b> , 15m <sup>2</sup> minimum area	Town home Type 1 3 bed (A) Ground: 10.5m <sup>2</sup> Level 1: 34m <sup>2</sup> Level 2: 5m <sup>2</sup> <b>Total: 49.5m<sup>2</sup></b>  Town home Type 1 3 bed (B) Ground: 10.5m <sup>2</sup> Level 1: 34m <sup>2</sup> Level 2: 5m <sup>2</sup> <b>Total: 49.5m<sup>2</sup></b>  Town home Type 2 3 bed (A) Ground: 8.5m <sup>2</sup> Level 1: 55m <sup>2</sup> Level 2: 4m <sup>2</sup> <b>Total: 67.5m<sup>2</sup></b>  Town home Type 2 3 bed (B) Ground: 8.5m <sup>2</sup> Level 1: 36m <sup>2</sup> Level 2: 3m <sup>2</sup> <b>Total: 47.5m<sup>2</sup></b>  Town home Type 3 Ground: 19m <sup>2</sup> <b>Level 1: 44m<sup>2</sup></b>

Element	Design Guideline	Proposal
		Level 2: 5m <sup>2</sup> <b>Total: 68m<sup>2</sup></b>  Town home Type 5 Ground: 12m <sup>2</sup> Level 1: 21m <sup>2</sup> Level 2: 1m <sup>2</sup> <b>Total: 34m<sup>2</sup></b>
	and 3m minimum dimension for courtyard	Town home Type 1 3 bed (A) 6x4m  Town home Type 1 3 bed (B) 6x4m  Town home Type 2 3 bed (A) 8.5x4.5  Town home Type 2 3 bed (B) 6x4.5m  Town home Type 3 4.5x7m  Town home Type 5 4x4m  Terrace 3 bedroom 5.5x7.5m
	and 2m minimum dimension for balconies	2.2m – 7.8 m

Significant consideration has been given during design development to ensure visual and acoustic privacy of residents at Level 1 and 2. Accordingly, the design includes provision of a range of measures to mitigate any concerns including:

- Adequate separation between buildings;
- Inclusion of an arbour structure and planter with deep soil between courtyards on Level 1 that will mitigate overlooking and acoustically screen between dwellings on Level 1;
- Privacy screens to all windows that face a corresponding window on Level 2;
- Offset and indented windows to provide screening via oblique angles on Level 2; and
- Offset windows to avoid direct lines of sight on Level 2.

To further address Council's concerns Frasers have provided indicative plans to indicate where additional screening is proposed to the rear of dwellings by inclusion of screens/ louvers to all windows (excluding end dwellings with over 9m separation) providing residents with enhanced screening (**Appendix J**).





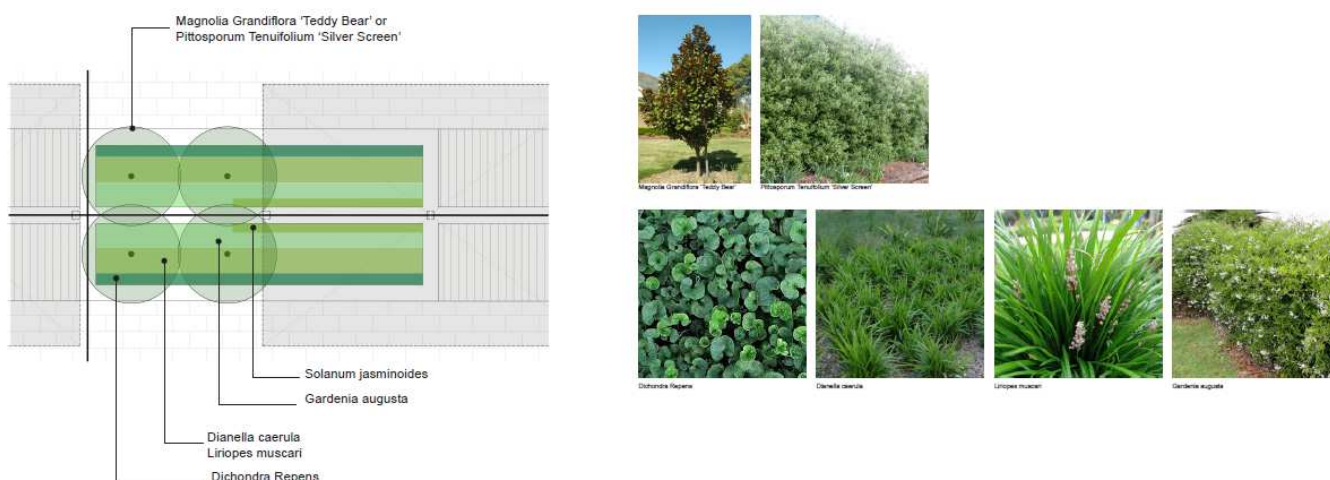
**Figure 5** Proposed additional privacy screens

Source: GSA

Further screening is also be pproposed by planting a combination of *Magnolia Grandiflora* 'Teddy Bear' and *Pittosporum Tenuifolium* 'Silver Screen' to void spaces between arbors to provide increased privacy to the rear courtyards. The vegetation will grow to a suitable height (4-5 metres) to provide additional vegetative screening between dwellings. Indicative Landscape plans have been prepared by Hassell and are attached at **Appendix K**. This will also assist in addressing the heat island effect.

Frasers are happy to provide a bond for 2 years to ensure the establishment of trees in the Residential Precinct.

An artists render of the courtyard is shown at **Figure 7** and **Figure 8** below that demonstrate the courtyards will be a high quality space that balances privacy, liveability and amenity, to deliver density without scale.



**Figure 6** Proposed planting schedule for townhome courtyard planter

Source: Hassell





**Figure 7** Rear courtyard view from the primary living area



**Figure 8** Rear courtyard outdoor view



In addition to private open space provided within each dwelling, it is also important to recognise the role that the Mews provide for amenity and open space within the Residential Precinct. The Public Domain describes the Mews as follows:

*“The mews are shared neighbourhood spaces, allowing for limited, low speed vehicle movement, parking for residential visitors, trees and landscaped areas.*

*The mews are an extension of private open spaces into shared, pedestrian prioritised spaces where people are able to interact and children can play safely within the confines of their local home environment.*

*This space will have flush kerb lines, with landscape and paving delineating different areas for vehicular movement and parking.”*



**Figure 9 Artists impression of the Mews**

Whilst each dwelling achieves generous open space far in excess of the minimum required by the Design Guidelines the Mews provide additional amenity and is an additional open space environment that is an extension of private open spaces for residents.

Accordingly, considering the DA's consistency with the Concept Plan, Design Guidelines and Public Domain Plan the proposals provision of private open space and building separation is appropriate and privacy between dwellings is suitably addressed.

## 4. Council Comment

### Draft Medium Density Design Guide 2016

As part of its assessment and approval of the Design Guidelines the Department had specific regard to the Draft Medium Density Design Guide and where appropriate required the Design Guidelines to adopt certain criteria, and in other instances did not require it. Accordingly, the Design Guidelines are the relevant guiding document for built form in the Residential Precinct. The Draft Medium Density Design Guide (DMDDG) holds no statutory weight or status to the assessment of this DA.

## 2.4 Key Elements and Urban Structure

### 1. Council Comment

- ***Buildings are sited and designed to provide high levels of amenity to residents, workers and the public domain***
- ***Buildings are modulated and articulated to reduce the appearance of building bulk and scale and to provide visual interest***

***The proposed development does not achieve high levels of amenity to residents as discussed above, where cross ventilation, access and privacy is considered to have been unreasonably compromised in the building siting and design. Furthermore, these amenity concerns are considered to be exacerbated by the at-grade parking arrangement proposed, which is also considered increase the overall bulk of buildings in the residential precincts. The applicant is required to adequately demonstrate how the above characteristics of the TCG has been achieved by the proposal.***

The Design Guidelines were approved in conjunction with Residential Precinct Design Report (**Appendix E**) which included the built form being delivered by this DA. To deliver the design approved by the Concept Plan the principles state:

- *Design of residential accommodation, in particular in mixed use settings, provides for a high level of amenity, including solar access, visual and acoustic privacy*

To achieve this principle, the Design Guidelines set out performance criteria which (as outlined at Section 1.5 of the Design Guidelines) are consistent with this principle. The design solutions represent the preferred way of demonstrating achievement of the performance criteria. Accordingly, the design solutions are the expression of achieving a high level of amenity. The DA has adopted all design solutions, demonstrating achieving high levels of amenity for residents.

The design of buildings in this DA feature modulated and articulated built form that includes a variety of heights, setbacks, fenestration and a variety of high quality materials that will provide visual interest by delivering variety of built form character and personality in the precinct, as outlined in the Design Report prepared by Group GSA and submitted with the DA. The quality of the built form is extremely high and the Residential Precinct will be an exemplar in medium density design in Western Sydney (see **Figure 10 – Figure 13**).





**Figure 10** Artist Impression of Townhome as viewed from Local Park



**Figure 11** Artist Impression of Townhome as viewed from Mews





**Figure 12** Artists impression of Terraces as viewed from Greenway Road



**Figure 13** Artist Impression of Townhome as viewed from Mews

Car Parking, Cross ventilation, access is further discussed in more detail at Sections 2.3(2) and privacy at 2.3(4).

Whilst Frasers is confident the design delivers a quality development that achieves high levels of amenity, consistent with that approved by the Concept Plan, to address Councils concerns Frasers are happy to investigate mechanical ventilation of those one-bedroom homes that are naturally ventilated but are not cross-ventilated.

Frasers are also happy to explore additional screening opportunities to the rear of dwellings by inclusion of screens or louvers to all windows excluding those on the ends with a separation of more than 9m.

Further screening can also be provided by planting a tree species in the courtyard planter that will grow to provide vegetative screening. This will also assist in addressing the heat island effect.

Frasers are happy to provide a bond for 2 years to ensure the establishment of trees in the Residential Precinct.

## 2.5 Residential Precinct Built Form Guidelines

### 1. Council Comment

- ***consolidates and conceals on-site car parking from view from the public domain***

The proposed at-grade arrangement achieves the performance criteria and is consistent with the Illustrative Design approved by the Concept Plan (refer to the Residential Precinct Design Report at **Appendix E**) which always envisioned an at-grade car park sleeved by residential dwellings (refer to **Figure 14**). A basement car park was never considered by the Concept Plan and its inclusion would be a contravention of MOD 4.

As outlined at Section 2.3(2) inclusion of basement car parking would have an unacceptable cost implication to the development and would prevent Frasers meeting Commitment 71A to deliver dwellings within a range of price points within the Residential Precinct, including 15% of dwellings suitable for purchase as moderate-income housing (defined as 80% to 120% of the average income across NSW).

Notwithstanding the above, **Figure 14** below demonstrates that when viewed from the public domain the on-site car parking has been concealed. **Figure 15** shows the car park is provided in a consolidated arrangement, achieving the above performance criteria.





Figure 14 View of Townhome car park treatment



Figure 15 Consolidated car park arrangement



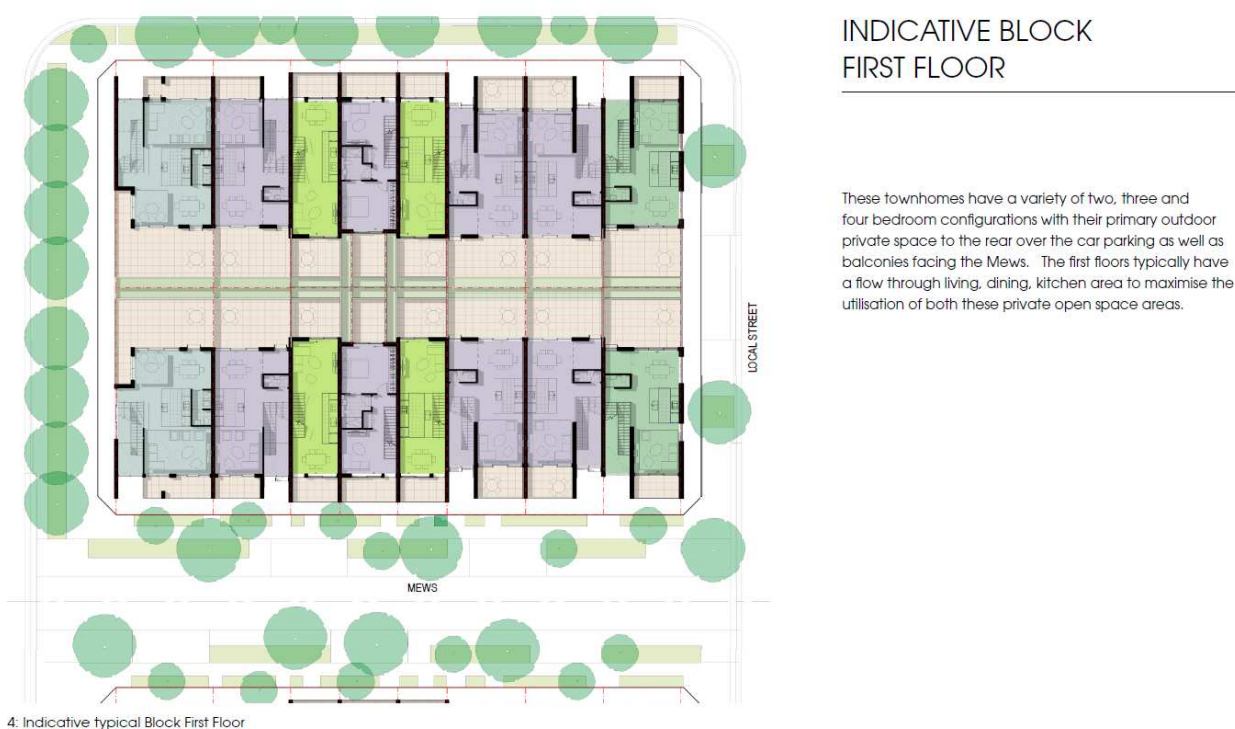
## 2. Council Comment

- ***is provided with adequate private open space***

The Residential Precinct is a medium density locality which aims to deliver density without scale. This density is essential to the delivery of housing that will take advantage of the adjacent railway station and Town Centre as required by Urban Growth as part of the bid process and as reflected in the 3,530 dwellings approved by the Concept Plan.

It is important to recognise that whilst this site is technically a 'greenfield', it is unique in that it is designated as a town centre around public transport infrastructure. Accordingly, it is appropriate that a density is achieved beyond a typical greenfield site. The townhome residential typology is effectively a hybrid between residential flat buildings and townhouses, which achieves increased density without scale. It is therefore not appropriate to set the same amenity standards for these dwelling as typical town houses, which is why the Design Guidelines were prepared with their own specific performance criteria and design solutions for the typology.

The illustrative typology approved by the Concept Plan always envisioned a variety of private open spaces, including between dwellings in the arrangement delivered by the Design Guidelines (refer to **Figure 16**). Based on this design the performance criteria and design solutions to deliver this building were listed in the Design Guidelines. The DA has adopted all Design Solutions, including provision of private open space.



**Figure 16** Illustrative design of the Townhome product at Level 1

Source: Residential Precinct Design Report and Illustrative Design Scheme

The guidelines require residential precinct homes be provided with adequate private open space.

Frasers has delivered a variety of private open spaces including a front garden, courtyard and multiple balconies that greatly exceed the requirements of the Design Guidelines as outlined at the below table. Indeed, each dwelling achieves a quantum of private open space that is appropriate and adequate for the urban locality that Edmondson Park is designated to become; is far in excess of the requirements of the ADG and (whilst not relevant to this DA) is consistent with the design guidance for Private Open Space under the Draft Medium Density Design Guide.

The minimum area provided by the design for any one bedroom apartment is 80% greater than the minimum required by the design solution- some dwellings achieve even greater private open spaces again. The minimum area provided by the design for two bedroom homes is 158% greater than required by the design solution and three bedroom apartments is 126% - 353% greater than the minimum required by the design solution .

Therefore the private open space afforded by each home is adequate achieving 18-20sqm of open space for one bedroom homes, 31sqm for two bedroom homes and between 34-68sqm for three bedroom homes

Element	Design Solution	Proposal	Area variation
Private Open Space	Where for a <b>1 bedroom dwelling</b> , 10m2 minimum area	18-20sqm	+80%
	Where for a <b>2 bedroom dwelling</b> , 12m2 minimum area	Town Home Type 4 2 bedroom Ground: min 11m2 Level 1: min 19m2 Level 2: min 1m2 <b>Total: 31m2</b>	+158%
	Where for a <b>3 bedroom dwelling</b> , 15m2 minimum area	Town home Type 1 3 bed (A) Ground: 10.5m2 Level 1: 34m2 Level 2: 5m2 <b>Total: 49.5m2</b>	+229%
		Town home Type 1 3 bed (B) Ground: 10.5m2 Level 1: 34m2 Level 2: 5m2 <b>Total: 49.5m2</b>	+229%
		Town home Type 2 3 bed (A) Ground: 8.5m2 Level 1: 55m2 Level 2: 4m2 <b>Total: 67.5m2</b>	+350%
		Town home Type 2 3 bed (B) Ground: 8.5m2 Level 1: 36m2 Level 2: 3m2 <b>Total: 47.5m2</b>	+216%
		Town home Type 3 Ground: 19m2 Level 1: 44m2 Level 2: 5m2 <b>Total: 68m2</b>	+353%
		Town home Type 5 Ground: 12m2 Level 1: 21m2 Level 2: 1m2 <b>Total: 34m2</b>	+126%





**Figure 17** Artists impression of Level 1 private open space (viewed from the harbour to ward dwelling)

Whilst each dwelling achieves greater than the open space required by the design solution the Concept Plan has included Mews which deliberately aims to provide additional amenity and open space environment that is an extension of private open spaces for residents.

Accordingly, the design seeks to balance the need to provide the density necessary to support and take advantage of the railway station and town centre while providing adequate private open space. The DA exceeds the minimum requirements on all occasions and delivers pedestrian friendly Mews as an extension of private open space for residents. Accordingly, the DA achieves the performance criteria and is considered to provide adequate private open space.

### 3. Council Comment

- provide for 1, 2, 3 and 4 bedroom dwellings**

Whilst the performance criteria does not specify the mix of 1, 2, 3 and 4 bedroom dwellings the DA has delivered a unit mix that will deliver an appropriate mix of dwellings as outlined below.

The subject DA is for the first stage of development in Residential Precinct 1, however additional housing will be delivered across future stages within the Residential Precinct and Town Centre Core. The unit mix as currently forecast (subject to change) is outlined at the below table.

Dwellings	Number	Proportion (%)
Residential Precinct 1 – Stage 1 (779/2017) this DA		
1 bedroom	24	23%
2 bedroom	12	11%
3 bedroom	59	57%

Dwellings	Number	Proportion (%)
4 bedroom	9	9%
Residential Precinct 1 (All stages)		
1 bedroom	80	23%
2 bedroom	61	18%
3 bedroom	184	53%
4 bedroom	4	7%
All Residential Precincts (1-3 (as forecast))		
1 bedroom	188	21%
2 bedroom	165	18%
3 bedroom	505	57%
4 bedroom	35	4%
Town Centre East DA (DA767/2017)		
1 bedroom	155	36%
2 bedroom	253	59%
3 bedroom	19	5%
Entire Frasers Town Centre (Residential Precinct and Town Centre)		
1 bedroom	518	29%
2 bedroom	716	40%
3 bedroom	542	30%
4 bedroom	35	2%

Development of the Frasers Town Centre will deliver a wide range of dwelling types that will suit a variety of lifestyle and housing choices. It is expected that families that require multiple bedrooms would prefer to live in the Residential Precinct rather than in apartments in the Town Centre Core. Accordingly this is reflected in the dwelling mix for the residential precinct (1-3) which, once completed across all three precincts will deliver 21% one bedroom, 18% two bedroom, 57% three bedroom and 4% four bedroom dwellings. This balance is considered appropriate for the residential precinct. If traditional medium density dwellings were provided, as suggested by Council, the dwelling mix would be even less diverse than that proposed to be delivered by Frasers.

The dwelling mix for the Town Centre East DA (DA779/2017) provides 36% one bedroom, 59% three bedroom and 5% three bedroom dwellings. There is a larger proportion of one and two bedroom dwellings in the Town Centre reflecting the high density nature of the Town Centre close to the train station which will likely appeal to singles and couples or smaller families who do not require multiple bedrooms.

When considering development of the entire Town Centre the proportion of dwellings is generally more balanced overall with 29% one bedroom, 40% two bedroom, 30% three bedroom and 2% four bedroom dwellings. It is noted that beyond the Town Centre itself there is substantial development for traditional detached housing under way or proposed for those families that prefer this type of housing, including many four and even five bedroom dwellings. The proposed dwelling mix and dwelling typology provides an appropriate transition in density from the train station, consistent with strategic findings of the Department and PAC in its approval of the Concept Plan.

## 2.6 Landscaping

A landscaping plan (see **Appendix K**) has been prepared by Hassell that shows the proposed layout of planting for each dwelling type.

## 2.7 Traffic Management

- The applicant is requested to provide time line for the construction of the external and internal road network to accommodate the proposed development.***

Frasers have sought approval for the construction of roads to Residential Precinct 1 under DA583/2017 having lodged the DA in July 2017. It is the intention to deliver the road network to the site subject to this DA approval prior to construction of Residential Precinct 1 (Stage 1 Built Form).

- ***The Mews will become a road related area, and cannot be extinguished, without consultation with and approval of Council.***

Frasers have no objection to Council imposing a condition that requires a restriction on title that benefits Council to ensure that pedestrians and vehicles have a right of access to the Mews in perpetuity.

- ***The mews are to have a minimum carriageway of 6.0 m for two-way traffic, and 2.5m indented parking bays to accommodate on-street parking.***

The Mews will be amended to accord with the above commentary. Amended landscape plans are currently being prepared and will be submitted to Council for approval.

- ***The proposed local streets and neighbourhood streets are also to incorporate indented parking bays to accommodate over flow parking demand.***

Frasers have sought approval for the construction of roads in the Residential Precinct under DA583/2017 having lodged the DA in July 2017. Local streets and neighbourhood streets incorporate indented parking bays.

## 2.8 Community Planning

***'All open space in the study area be designated as 'Community Title'***

The parks proposed by this DA are designated as community title (refer to subdivision plan at Appendix W of the SEE).

## 2.9 Rural Fire Services (RFS)

***"A bush fire assessment report which addresses the proposed development and clause 44 of the 'Rural Fires Regulation 2008' is required. At present the bush fire assessment report submitted with the referral does not relate to the proposed development."***

Eco Logical has made contact with the RFS who have confirmed that they were only provided with one of the two bushfire documents submitted with the DA (**Appendix I** and **J** of the SEE). A complete set of documentation is to be supplied by Council to the RFS and it is expected that this will resolve any outstanding queries.

## 2.10 Lighting

***The applicant shall submit to Council details regarding the lighting the Mews as part of the proposed development.***

Lighting for the Mews is proposed as follows:

- WE-EF RMT320 LED, 105 – XXXX.
- Asymmetrical side throw, P65 beam.
- 1 x 14W LED pole mounted luminaire c/w integral control gear.
- Light fitting on 4m poles.



Figure 18 Example of Mews Lighting typology

### 3.0 Response to SWCPP Comment

#### 3.1 Building typologies and car parking

##### 1. Council Comment

- ***The SWCPP have raised concerns that the proposed medium density housing typologies used by the applicant will create a complex housing arrangement where dwellings are overlapping and unnecessarily placed on top of each other.***
- ***it is advised that the applicant investigate the use of traditional terrace housing above basement parking at the site in order to prepare a case that demonstrates the best medium density housing outcome for the residential precincts. It is strongly advised that if the proposed style of medium density housing has been successfully implemented elsewhere by the developer that this be presented by the applicant, in detail, for the panel's consideration.***

A Residential Precincts Design Report and Illustrative Design Scheme was assessed by the Department and Council as part of the Concept Plan modification (refer to **Appendix E**) that specifically considered the medium density typology of buildings proposed by this DA. This includes townhomes featuring dwellings on multiple levels and over separate dwellings, sleeving ground level carparking with private open space above.

In approving the Concept Plan the Department stated:

*"The Department is satisfied with the proposed housing densities and typologies. The proposed density in the Residential Precinct is 43 dwellings per hectare. This is consistent with the draft Medium Density Design Guide*



2016's (DPE) expectation that medium density housing will typically result in a density of 25-45 dwellings per hectare.

*The proposal increases housing supply and through the concept design, Design Guidelines and Public Domain Plan, demonstrates a commitment to providing diverse and well-designed housing and public spaces accessible to different life stages and budgets."*

The Design Guidelines have been prepared to facilitate the building typology considered by the Concept Plan and accordingly the housing typology has been designed to the requirements of the Design Guidelines. In accordance with Schedule 6A, Clause 3B of the EP&A Act it is not possible to vary the typology from that approved by the Concept Plan. Notwithstanding, the DA remains consistent with the Design Guidelines as follows.

Relevant key performance criteria for multi-dwelling housing (townhomes) are located at **Section 5.0** of the Design Guidelines, as follows:

#### 5.2 Multi-dwelling housing:

- *provide for multiple dwellings across levels*
- *provide for a variety of single level and multiple level dwellings*
- *provide for 1, 2, 3 and 4 bedroom dwellings*
- *have separate front entries for each dwelling from the street*
- *car parking screened from the street*
- *achieves diversity in character through variation and articulation in dwelling types*

Additional technical requirements for the townhome product are contained at Table 3 of the Design Guidelines, including:

- *Building height, setbacks and separation;*
- *Provision of open space;*
- *Provision of landscaping and private open space;*
- *Dwelling sizes;*
- *Storage;*
- *Solar access targets;*
- *Environmental sustainability targets; and*
- *Provision of car and bicycle parking.*

In approving the Concept Plan the Department planner assessment report stated:

*"The Design Guidelines include numerical amenity guidelines for the various dwelling forms in the Residential Precinct. The Department considers the numerical guidelines (as amended) will ensure a high level of amenity."*

The DA fully complies with the Design Guidelines as provided at **Section 5.4** and **Appendix Z** of the SEE.

The housing typology is a simple arrangement that provides entry from the street and car park for every dwelling. The Design Guidelines require provision of a variety of single level and multiple level dwellings with 1 bedroom to 4 bedroom dwellings. Traditional terrace housing would be non-compliant with the Design Guidelines in this respect and therefore inconsistent with the Concept Plan.

A key component of the Urban Growth bid and consideration of the Department in approving the Concept Plan was to locate appropriate density surrounding the railway station. The proposed Townhome product will deliver appropriate medium density housing in the residential precincts with high levels of amenity, within development and in the surrounding public domain.

The Residential Precinct provides a transition in density and scale between the Town Centre and low density detached housing that surrounds the Frasers Town Centre. The design provides density without scale which was a

key requirement of the Frasers bid to Urban Growth which seeks to locate densities around the town centre core and railway station. The design also creates greater diversity of home types of varying widths and living arrangements as recommended by Council's Design Excellence Panel. Delivery of traditional terrace housing would not accord with these key principles that underpin the winning bid with Urban Growth.

A key benefit of the typology is the inclusion of silver level universal design for the majority of ground floor units that would otherwise not be possible for traditional terrace housing. Commentary on accessibility is provided separately below.

The Townhome typology is already well known to Council through the approval of DA621/2016 which involves construction of a full strata block display home on Soldiers Parade. In approving the DA the planners assessment stated:

*"the proposal complies with the relevant provisions of the DCP in that it is consistent with the character, design, layout, pedestrian amenity and public domain established by Part 8.0... the current proposal is consistent with the Concept Plan as approved... and the proposal satisfies the key planning controls for site as detailed above and is generally considered to be suitable for the site."*

Construction of the display homes has started and whilst the typology on plan may appear more complicated than in practical terms, the typology is not new to Liverpool and is currently under construction in Residential Precinct 1.

## **2. Council Comment**

- ***The SWCPP is concerned that the at-grade parking is exacerbating amenity issues associated with the complexity of the dwelling typologies and this is likely mitigated through the provision of basement parking for residents and visitors.***
- ***it is advised that the applicant investigate the use of traditional terrace housing above basement parking at the site in order to prepare a case that demonstrates the best medium density housing outcome for the residential precincts.***

Refer to Section 2.3.1 and 2.3.2.

### 3.2 Equity of access to private open space

- ***It is advised that the applicant adequately demonstrate how disabled, elderly and low mobility occupants will be able to reasonably use the various medium density dwelling types, especially with regards to vertical circulation and equity of access to private open spaces at the podium level.***

Refer to Section 2.3.3.

### 3.3 Ventilation

- ***It is also advised that the applicant adequately demonstrate how all dwellings will be adequately ventilated due to the at-grade parking arrangement.***

Refer to Section 2.3.4.

### 3.4 Separation and Privacy

- ***The SWCPP have raised concerns regarding privacy between dwellings due to the limited size of private open spaces (POS), the raising of private open spaces above ground level and the limited separation between dwellings. It is advised that the applicant give further consideration to increasing the separation between dwellings overlooking areas of POS. This would effectively increase POS areas, providing increased functionality and liveability, while reducing impacts to visual and acoustic privacy***
- ***At this stage, the panel have raised significant concerns regarding the adequacy of building separation and privacy between dwellings where there is limited scope for screening. It is advised that the applicant provide additional deep soil planting and landscaping into the town homes dwelling designs to increase screening and visual and acoustic privacy.***
- ***It is likely that, where the applicant cannot sufficiently demonstrate that the proposed level of building separation and privacy is the best outcome for the development of the residential precincts, Council would not be providing a supportive recommendation to the panel.***

#### Privacy and Separation

Refer to Section 2.3.5.

#### Deep Soil

Refer to Section 3.7.

### 3. Council Comment

- ***Accordingly, the mews between dwellings could be decreased to focus on pedestrian activity and allow further separation between rear facing dwellings***

The Mews, vehicle access and pedestrian activity principles were addressed by the Concept Plan and are included in the Public Domain Plan. Variation of the design, including changes suggested by Council would contravene the Concept Plan which specifically approved the public domain layout and Mews. In approving the Concept Plan the Department stated:

*“The Proponent’s vision for the site is for a high density, mixed use urban core surrounded by medium density housing and parklands. The Department supports this vision strategically, and considers the built form and public domain indicated in the concept designs is innovative and of a high design quality. The Design Guidelines and Public Domain Plan are crucial in ensuring the vision articulated in the concept designs is delivered on the site. The Department considers the Design Guidelines and Public Domain Plan are an appropriate alternative to a DCP and will deliver the vision for the FTC.”*

Notwithstanding the DA’s compliance with the Concept Plan, Design Guidelines and Public Domain Plan, increasing separation between dwellings would necessitate amendment of the Mews resulting in a non-compliance with the Concept Plan, Design Guidelines and Public Domain Plan.



The Design Guidelines require:

Table 1 - *The Mews provide pedestrian friendly and low speed car environments;* and

Table 3 – *Visitor car parking is provided within the Mews.*

The Public Domain Plan establish requirements for the Mews including:

*Vision – The mews are shared neighbourhood spaces, allowing for limited, low speed vehicle movement, parking for residential visitors, trees and landscaped areas.*

*The mews are an extension of private open spaces into shared pedestrian prioritised spaces where people are able to interact and children can play safely within the confines of their local home environment.*

*Technical requirements - 6.0m carrageway, inclusive of 2.3m parking and landscaping each side of the road and a 5.5m wide carriageway.*

The Mews technical requirements are shown at Error! Reference source not found.. Anartist impression of a typical Mews is provided at **Figure 19** below.



**Figure 19 Artists impression of the Mews**

Council's suggestion to reduce the mews to a more narrow pedestrian environment is contrary to the findings of the Department and PAC who approved the Concept Plan, Design Guidelines and Public Domain Plan and would be non-compliant with the parameters for the entire Town Centre, including layout, role and function of the Mews as a pedestrian friendly, low speed car environment.

Important lessons have been learned from failed Radburn style developments in Sydney where pedestrian laneways have long been a contributor to security and safety concerns due to low levels of activity and decreased casual surveillance. It has been demonstrated that some levels of activity by vehicles reduces these issues.



### 3.5 Unit Mix

***The SWCPP have raised concern to the adequacy of the unit mix within the proposal. It is advised that the applicant adequately demonstrate how the numbers of dwelling types from 1 bedroom, 2 bedroom, 3 bedroom and 4 bedroom are justified at the site, especially considering the amount of disparity between 1 and 2 bedroom dwellings being provided. It is recommended that the applicant increase the housing mix to provide more variety in dwelling types by bedroom numbers.***

Refer to Section 2.5(3)

### 3.6 Mews

#### 1. Council Comment

- ***The SWCPP have raised concern that the mews will not be used for visitor parking only and this will detract from their intended amenity. It is advised that the mews be investigated to be used as pedestrian environments only and they be reduced in size, and from that, any space gained can be provided to further separating dwellings within the development.***

As outlined above the layout, function and role of the Mews is established by the Concept Plan, Design Guidelines and Public Domain Plan, which the DA complies. Amendment of the Mews would not be compliant with the Concept Plan.

It is proposed that the Mews visitor parking will have a 2 hour time limit from 7am -8pm. Frasers is happy to work with Council to investigate the option for Council to monitor / ensure compliance with the parking hours.

#### 2. Council Comment

- ***The SWCPP have also raised concern for potential expenses incurred by future residents of the site due to costs associated with the upkeep of the proposed mews and how this affects housing affordability. It is advised that the applicant provides sufficient information demonstrating how this has been investigated.***

Housing in the Residential Precinct has limited common property to maintain and upkeep compared to other developments that may include multiple lifts, pool facilities and the like. The only common property within the Residential Precinct is the mews, community parks and car parks. These facilities have a very long life span through their design and material selection and minimal ongoing maintenance that would be shared between a large population.

Frasers are in the process of developing maintenance budgets that includes upkeep of the Mews. Strata fees will be available to prospective buyers as part of the sales process and these are expected to be relatively low considering the high-quality environments available to residents of the Precinct.

### 3.7 Deep Soil

***The SWCPP have raised concern regarding the proposed development's ability to provide appropriate deep soil zones onsite. Accordingly, the applicant is advised to adequately demonstrate that there is sufficient deep soil area incorporated into the residential precincts design and for each dwelling, or alternatively, provide additional deep soil areas onsite.***

The residential public domain has been designed to ensure a high level of landscape permeability. All landscaped public domain areas including street verges, landscaped mews and parks are on deep soil and aim to utilise pervious materials where appropriate.

Ground floor private open spaces provide a minimum of 40% soft scape. Rear private open spaces, on structure include planter boxes to a minimum 600mm planting depth.

Planting within the public domain open spaces and streets provide amenity to shade, assist with urban heat island affect and reinforce street legibility while reflecting the site's unique natural landscape setting and site history.

Public streets and mews are lined with spacing suitable to tree canopy widths, providing shaded connections throughout the site. Verge widths and tree soil volumes have been designed to accommodate tree species allocated. This is confirmed by Hassell at **Appendix A**.

Deep soil calculations for the Residential Precinct are provided at **Appendix A** and outlined at the below Table demonstrating the provision of deep soil is generous in the public domain. Within development blocks deep soil is provided to 21% of Mews, 25% of parks, 30% of street verges and 42% of the Campbelltown Road landscape buffer. Within strata development blocks 6.5 – 9% of land area is deep soil. This DA (Stage 1) delivers 7.5% deep soil area within the strata development blocks.

Notwithstanding the above, Frasers are happy to replace the species in the courtyard planter of the Townhomes to a tree species that will grow to provide greater canopy and vegetative screening. This will also assist in addressing the heat island effect.

Frasers are prepared to offer a bond for 2 years to ensure the establishment of the proposed trees.



**Deep Soil Calculations**

Location	Total Area	Deep Soil (sqm)	Deep Soil (%)
Streetscape verge	11,000	3,350	30
Campbelltown Road landscape buffer	3,500	1,500	42
Local Park	1,950	600	30
Mews	4,660	940	20
Pocket Park/Gateway Park/Communal Open Spaces	3,000	750	25
Stage 0 Private Open Space	4,000	360	9
Stage 1 Private Open Space	9,680	700	7.5
Stage 2 Private Open Space	12,000	800	6.5
Stage 3 Private Open Space	6,900	540	7.5

**Figure 20 Residential Precinct 1 calculations and layout plan**

Source: Hassell

### 3.8 Compliance with Plans and Policies

*The SWCPP has raised concerns for the proposed developments compliance with the different plans and policies associated with the development of the site. Accordingly, it is advised that the applicant provide sufficient evidence demonstrating full compliance with the following:*

- a) State Environmental Planning Policy (State Significant Precincts) 2005;*
- b) Modification to Edmondson Park South Concept Plan MOD 4 – D479/17; and*
- c) Edmondson Park Frasers Town Centre Design Guidelines.*

#### **State Environmental Planning Policy (State Significant Precincts) 2005**

Assessment of the State Significant Precincts SEPP is provided at **Section 5.1** and **Table 2** of the SEE.

#### **Modification to Edmondson Park South Concept Plan MOD 4**

Assessment of the Concept Plan is provided at **Section 5.2**, **5.21**, **Table 3** and additional advice as issued to Council dated 17 October 2017.

#### **Edmondson Park Frasers Town Centre Design Guidelines**

Assessment of the Design Guidelines is provided at **Section 5.4** and **Appendix Z** of the SEE. It is noted that changes to the Design Guidelines as required by the Concept Plan amendment have no effect to the Design Guidelines for the Residential Precinct. Accordingly, the assessment of the Design Guidelines at **Section 5.4** and **Appendix Z** of the SEE is complete.