

STATEMENT OF ENVIRONMENTAL EFFECTS

Proposed new Shop-top Housing Development at

**Nos. 2-6 Bold Street &
Nos. 80-86 Cowper Street,
Granville**

Prepared for:

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ANNEXURES

A. C1 Clause 4.6 variation – Height of Building

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1.0 INTRODUCTION

This Statement of Environmental Effects (SEE) has been prepared on behalf of Idraft Architects Pty Ltd by Gary Shiels & Associates Pty Ltd – (hereafter referred to as GSA Planning). GSA Planning has expertise in Urban Design, Environmental Planning & Traffic Planning.

This SEE is to accompany a development application to Parramatta Council for construction of a shop-top housing development at Nos. 2-6 Bold Street and Nos. 80-82 Cowper Street, Granville. The proposed development has been designed by Idraft Architects Pty Ltd.

This proposal has been the subject of a pre-DA meeting and the matters raised are addressed in this application. In particular, the floor plans have been redesigned to provide greater amenity to the residents. Other changes include the redesign of the lobby area, strengthening of building corners, a resident-only gymnasium facility, podium level winter gardens on the southern side, amendments to stormwater handling; and landscaped trafficable treatment to adjacent Council land providing vehicular access to the railway land.

The architecturally-designed shop-top housing proposal will enliven the area between the railway line and Parramatta Road, with retail at ground floor level and residential accommodation above. The proposal complies with the floor space ratio, parking requirements, adaptable unit numbers, and provides a variety of unit types to cater for a varied demographic. The proposal provides parking for 128 vehicles comprising 95 parking spaces for residents, 23 spaces for visitors and 10 spaces for business/retail. Visitor parking is provided at ground level with opportunities for accessible visitor parking and car-share spaces.

The elegant and articulated tower element will be capable of being viewed from all sides and with its high level of architectural design, has the potential to be a landmark building in the area. Although the proposal complies with the overall height limit in the Local Environmental Plan (LEP) of up to 52 metres in the area, Clause 4.3(2A) of the LEP reduces this to 39 metres due to the site size. The building has been reduced by one storey from an earlier proposal; however exceeds the 39 metre height limit for the site size. Due to the orientation, the landmark potential, and the unique location of the site being bounded on three sides by roads and railway, it is our opinion that a height of 52 metres is justified and this is further discussed in the Application to Vary a Development Standard – Building Height appended to this document. The Clause 4.6 Application also notes there is no opportunity to enlarge the site by further consolidation to the north, east or south, and no success in efforts to consolidate with sites to the west.

Large areas of landscaped communal open space, compliant with Council's requirements, are provided at ground level and as roof terraces to the podium and the tower, for resident enjoyment. All units have the required private open space as balconies or terraces. The proposal is close to compliance with the deep soil landscaping requirements of the Granville Precinct, being 26% where 30% of the site area is required. The overall appearance of the building is enhanced with a strong emphasis on perimeter planters at podium and roof top level, rear setback landscaping, new street trees to Cowper Street and the proposed landscaping of Council's Road Reserve on the eastern side of the site.

This document is divided into six sections. Section 2 contains a site analysis, Section 3 provides details of the proposal, Sections 4 and 5 contains the detailed assessment of the application in accordance with Section 79C(1) of the Environmental Planning and Assessment (EP&A) Act 1979, and Section 6 concludes the report.

2.0 SITE ANALYSIS

This section contains a description of the following: The Locality; Site Description; Existing Built Form and Landscaping; Existing Character and Context; and Surrounding Road Network.

2.1 The Locality

The subject site is located approximately 18km north-west of the Sydney CBD, 1.8km from Parramatta CBD and is located within the Local Government Area (LGA) of Parramatta (see Figure 1).



Source: SIX Maps, 2016

 Subject Site

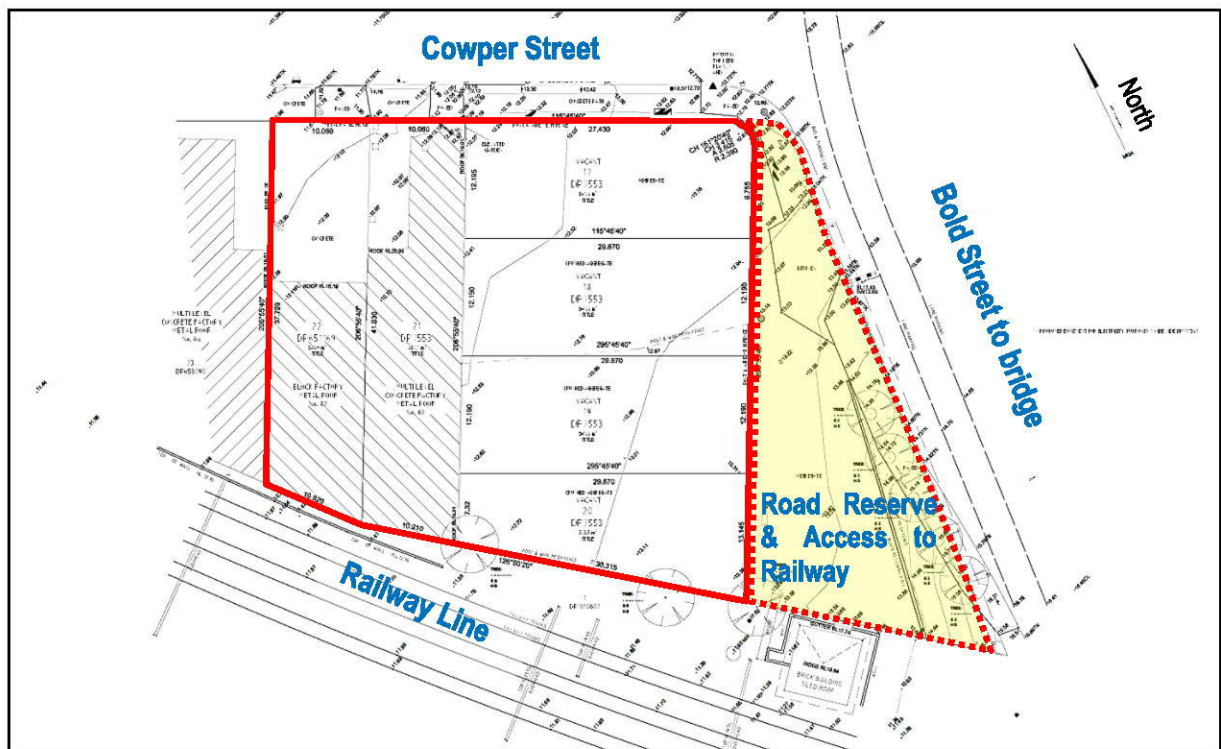
Figure 1: Location Plan

2.2 Site Description

The subject site is located on the western side of Bold Street and the southern side of Cowper Street, and is known as Nos. 2-6 Bold Street, and Nos. 80 and 82 Cowper Street Granville. The site is described as Lots 17, 18, 19, 20 and 21 in DP 7553 and Lot 22 in DP 651169.

The site is bounded on the northern and eastern sides by two roads and the main railway line to the south. The combined site is an irregularly shaped parcel with a total area of 2,204m² (see Figure 2 and Survey Plan separately submitted).

The site is generally level with a slight slope from the rail line (south) to Cowper Street (north). Adjacent to the site on the eastern side is a triangular area of land between the subject site and the elevated roadway to the Bold Street Bridge. This area appears to be part of the road reserve which previously provided access to dwellings formerly on those sites, and is currently utilised for parking (see yellowed area in Figure 2). It also provides access to an adjacent railway building, and to the railway tracks.



Source: iDraft Architects

Figure 2: Survey Plan

Subject Site
 Access to Railway Infrastructure

2.3 Existing Built Form and Landscaping

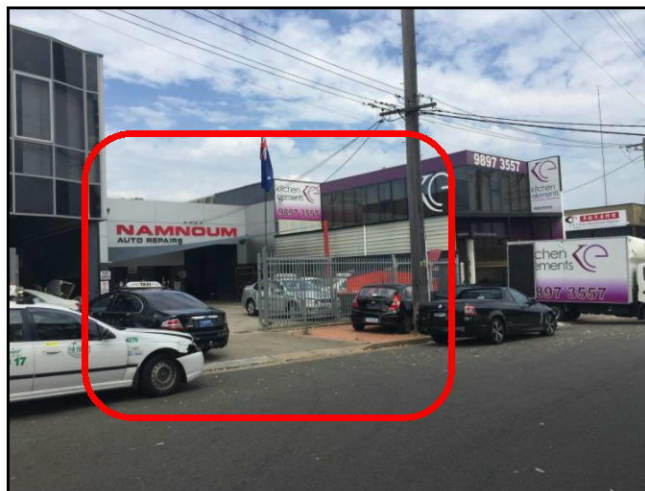
The Bold Street sites are currently vacant land (see Photograph 1). A portion is a hardstand area used for car parking. The Cowper Street sites are occupied by a factory and workshop (see Photograph 2 and 3).



Photograph 1: Nos. 2-6 Bold Street is currently vacant land used for parking.



Photograph 2: No. 80 Cowper Street is a two storey building



Photograph 3: No. 82 Cowper Street is a single storey workshop.

2.4 Access, Car Parking & Road Network

Pedestrian access is currently available to Nos. 80-82 Cowper Street via front gates that lead to the ground floor of both commercial premises. Nos. 2-6 Bold Street are accessed at street level from both Bold Street (via the adjacent road reserve) and directly from Cowper Street.

Granville Railway Station is approximately 280 metres south-west of the site. Granville Station connects the subject site with the North Shore Line, the T1 Western Line, the T2 Inner West/ South Line and Blue Mountains Line. The subject site is approximately 150 metres from a bus stop on Cowper Street which is serviced by Route No. 906, providing access between Fairfield and Parramatta.

As indicated, the site has frontage to both Bold and Cowper Streets and is in close proximity to Parramatta Road. Bold Street is generally 16 metres wide with footpaths on the eastern side of the street of approximately 2 metres. Cowper Street is 12 metres wide with footpaths on the northern and southern sides of the street of approximately 3.5 metres. According to the Roads and Maritime Services' (RMS) established road hierarchy, Bold Street is a Regional Road whilst Cowper Street is considered a Local Road.

2.5 Existing Character and Context

The surrounding character and context of the subject site includes a mixture of commercial uses and shop-top housing developments. One and two storey commercial uses are predominant with an 11 storey shop-top housing development currently under construction diagonally opposite the site on Cowper Street. Towards the south of the site is the railway line. The surrounding area is not heavily landscaped.

Development to the North

To the north on the opposite side of the road are Nos. 81-89 Cowper Street, which are single and double storey commercial developments. Also to the north, at Nos. 154-160 Parramatta Road, is a service station and car wash (see Photograph 4). To the north-east, Nos. 65-73 Cowper Street is under construction. This site will comprise an 11 storey shop-top housing development above a garage level, on a site which is approximately 1850m² (see Photograph 5).



Photograph 4: Development to the north of the site includes a service station and car wash.



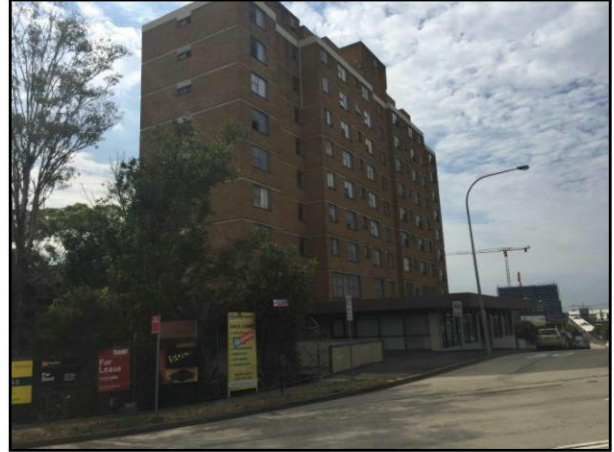
Photograph 5: Development to the north, diagonally opposite the subject site, on the north-eastern corner of Cowper and Bold Streets.

Development to the East

To the east of the site at Nos. 68-70 Cowper Street, is a two storey commercial development (see Photograph 6). Further to the south east is a 9 storey shop-top housing development named Granville Towers at No. 10 Bridge Street (see Photograph 7).



Photograph 6: Development to the east at Nos. 68-70 Cowper Street.



Photograph 7: Development further to the south-east of the subject site at No. 10 Bridge Street.

Development to the South

To the east of the site is a road reserve area used for parking, which provides access to the adjacent railway infrastructure and railway line to the south (see Photographs 8 and 9).



Photograph 8: The parking area and access to railway infrastructure and railway line on the road reserve area to the south-east of Nos. 2-6 Bold Street.



Photograph 9: The railway line to the south of Nos. 2-6 Bold Street, as viewed from the Bold Street bridge.

Development to the West

To the west is Nos. 84-90 Cowper Street, which consists predominantly of two-storey commercial developments (see Photograph 10). This section of Cowper Street terminates in a cul-de-sac (see Photograph 11).



Photograph 10: Development to the west of Nos. 80-82 Cowper Street.



Photograph 11: The cul-de-sac to the west of Nos. 80-82 Cowper Street.

3.0 DETAILS OF THE PROPOSAL

This section will describe the following: The Background to the Proposal; and Built Form, Design and Character.

3.1 Background to the Proposal

On the **30th of July 2014**, a development application (DA/490/2014) was lodged with Parramatta Council for a new 13 storey mixed use development containing two ground floor retail tenancies and 96 residential units over basement car parking. The application was refused at the JRPP of 9 December 2015.

On the **14th of March 2016**, a meeting was held with Council to discuss an amended proposal. Council recommended a Pre-Development Application be submitted for the new scheme.

On **29th of June 2016** a pre-DA meeting was held with Council. Based on Council's feedback regarding the height, internal layouts and stormwater handling and other matters, the scheme was revised. Updated concept drawings and a draft Clause 4.6 Application to Vary the Height of Buildings Development Standard was prepared.

3.2 Built Form, Design and Character

The proposal involves the consolidation of five lots, the demolition of the two existing structures, and construction of a 17 storey shop-top housing development at the corner of Bold Street and Cowper Street, Granville.

The shop-top housing development incorporates a total of 374.85m² of business or retail space, 92 residential units and a total of 128 car parking spaces on ground level and over two basement levels. The proposal exceeds the requirements for adaptable units and is capable of providing access in accordance with disability legislation (see Section 5.4.1). Table 1 provides a breakdown of the mix of units.

TABLE 1: UNIT BREAK DOWN		
Unit Type	No. of units	Percentage
Studio	2	0.2%
One Bedroom Studios	27	29%
Two Bedroom Apartments	48	52%
Three Bedroom Apartments	15	16%
Total	92	100%
Adaptable Dwellings	10	10.9%

The proposal will be highly visible due to the corner position of the site and therefore a more sculptural treatment of the tower has been incorporated in to the design. As noted, the subject site has two street frontages, with the third side facing the railway line and Railway Parade to the south. The building is likely to be seen from the west as well due to existing low buildings in the area.

The architectural design provided a strong identity by articulating all facades of the proposed tower, and the three visible sides of the podium. The Cowper Street entry and the corner to Bold Street each have an open feature frame to signify the entry points.

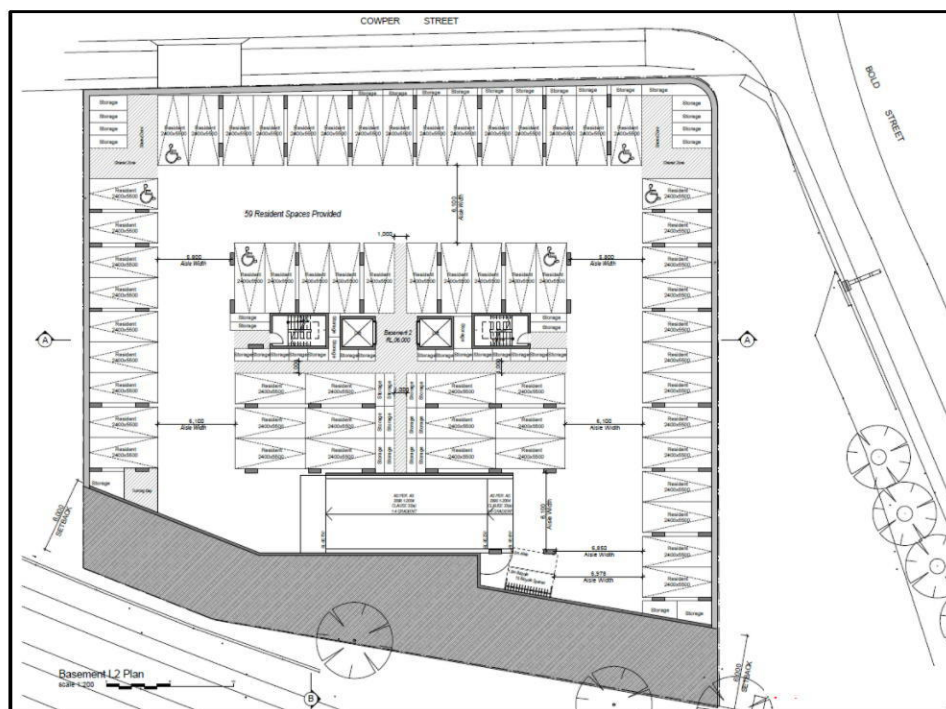
The main pedestrian access will be from Cowper Street to the residential lobby with retail on either side, with a secondary access from Bold Street via a covered colonnade in front of the retail. Vehicular entry is from Cowper Street and includes at-grade parking for visitors and a delivery area. The proposed shop-top housing development is serviced by two lift cores from the basement car park to the roof top terrace. The lifts service between three to five units within the residential tower component and between 11 and 14 units within the podium levels.

All units enjoy either private balconies or terraces, with two of the penthouses having private roof terraces. On Level 4 and the Roof Level it is proposed to provide expansive landscaped communal roof terraces. Both levels are accessible by lifts and stairs, with a communal kitchen and WC facilities being provided on the Roof Level.

The proposal will comprise a total of 1,645.95m² open space area, which is equivalent to 74% of the site area. In addition, 575.3m² of this will be deep soil landscaping or 26% of the site area, which is located at ground level and in planter boxes of the site. Further details regarding the proposed landscaping, species and design intent is detailed in the Landscape Plan, prepared by Canvas Landscape Architects (separately submitted).

Basement Level 2 Plan

The Basement Level 2 Plan includes 59 residential parking spaces, including six accessible, bicycle parking and storage areas (see Figure 3).

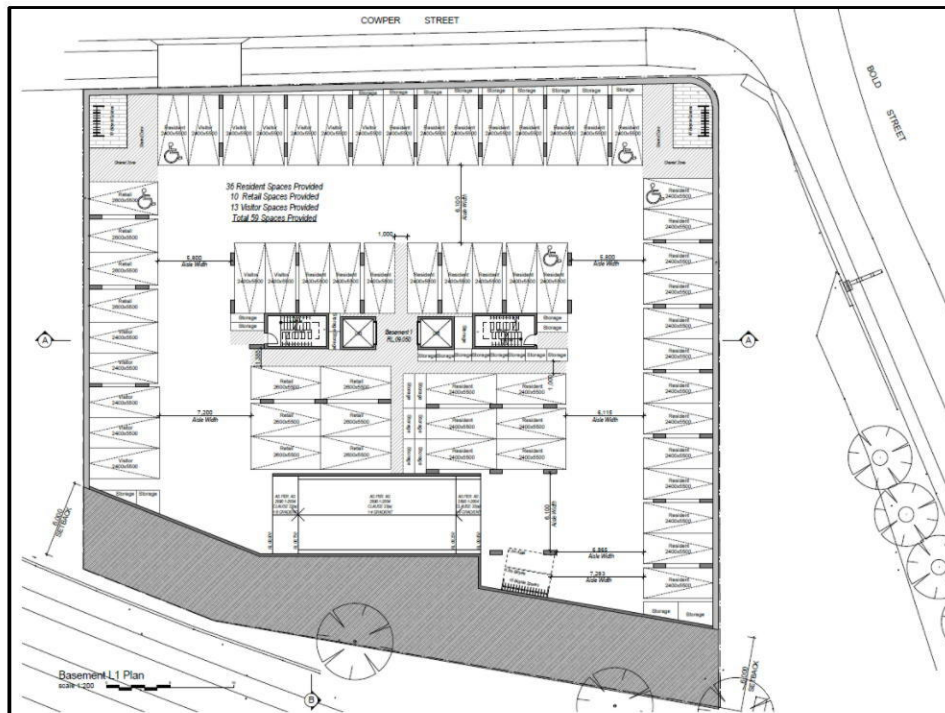


Source: iDraft Architects

Figure 3: Basement Level 2 Floor Plan

Basement Level 1 Plan

The Basement Level 1 plan provides 59 spaces including 10 retail spaces (one accessible), 13 visitor spaces, 36 residential spaces (four accessible), bicycle parking, storage areas and lift and stair access (see Figure 4).



Source: iDraft Architects

Figure 4: Basement Level 1 Floor Plan

Ground Floor Level

The Ground Floor plan includes two retail spaces, a resident gym and resident lobby, separate garbage rooms for residential and retail waste, vehicle entry, at grade parking, loading area, bicycle forecourt and parking, and landscaped areas (see Figure 5).



Source: iDraft Architects

Figure 5: Ground Floor Plan

Level 1 Plan

The Level 1 plan includes voids over entry lobbies and eleven units and balconies. These comprise six one-bedroom and five two-bedroom units (see Figure 6).



Source: iDraft Architects

Figure 6: First Floor Plan

Level 2 Plan

The Level 2 plan includes fourteen units comprising a studio unit, five one-bedroom units, seven two-bedroom units and one dual-level three-bedroom unit, with a communal Winter Zen Garden (see Figure 7).



Source: iDraft Architects

Figure 7: Second Floor Plan

Level 3 Plan

The Level 3 plan includes thirteen units including the upper floor of a three-bedroom unit, one studio, five one-bedroom units (three being accessible), seven two-bedroom units (four of which are dual level) and the upper level of a three-bedroom unit. A communal mezzanine Winter Zen Garden overlooks a void to the Level 2 Winter Zen Garden (see Figure 8).



Source: iDraft Architects

Figure 8: Level 2 Floor Plan

Level 4 Plan

The Level 4 plan includes five units comprising a one-bedroom unit, three two-bedroom units and a three-bedroom unit. Two expansive communal roof gardens which are accessible from the lift lobby are included on each side of the podium roof level, one with an accessible WC (see Figure 9).

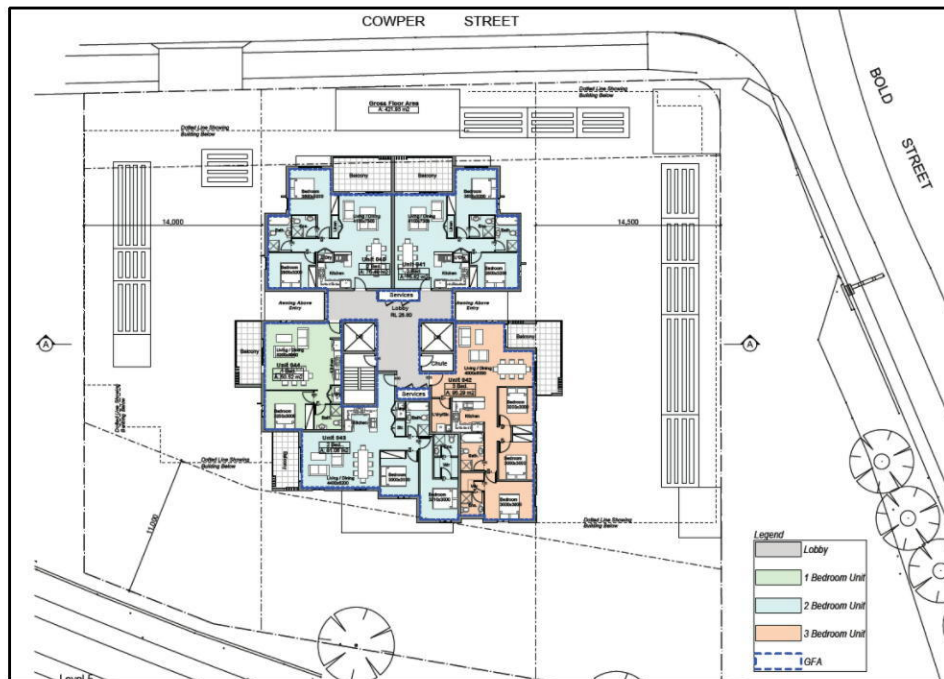


Source: iDraft Architects

Figure 9: Level 4 Floor Plan

Level 5 Plan

The Level 5 floor plan includes five units comprising a one-bedroom unit, three two-bedroom units and a three-bedroom unit (see Figure 10).

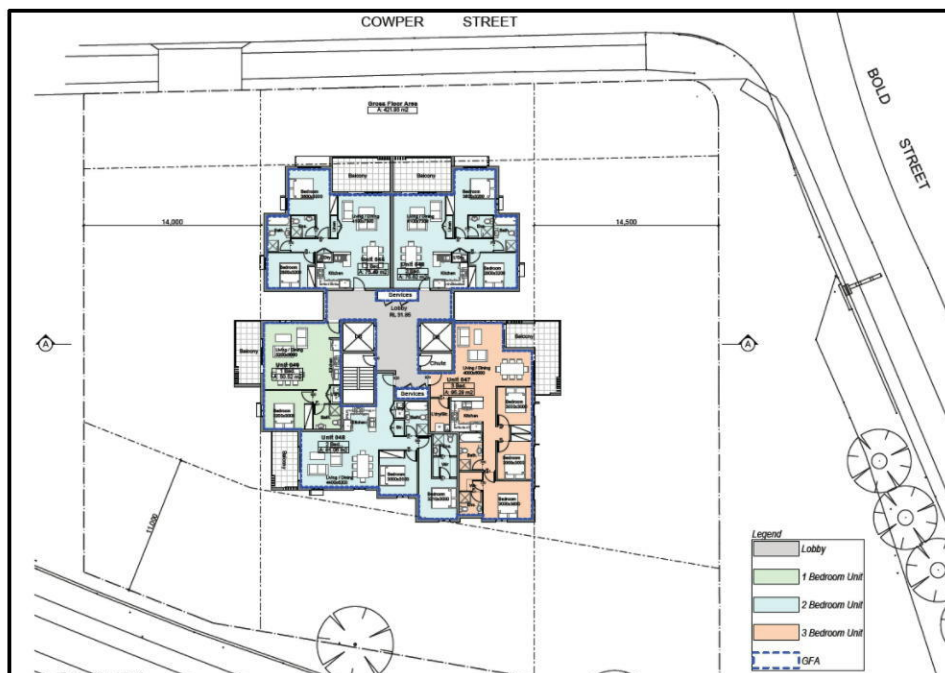


Source: iDraft Architects

Figure 10: Level 5 Floor Plan

Level 6-14 Plans

The Level 6-14 floor plan includes five units comprising a one-bedroom unit, three two-bedroom units and a three-bedroom unit (see Figure 11).



Source: iDraft Architects

Figure 11: Level 6-14 Floor Plan

Penthouse Level Plan

The Penthouse Level plan includes three penthouse units, each with three bedrooms and balconies and two with internal stair access to private roof terraces (see Figure 12).



Source: iDraft Architects

Figure 12: Penthouse Level Floor Plan

Roof Level Plan

The Roof Level plan includes lift and stair access to the roof top communal area with an accessible WC and a kitchen area. Additionally, two private roof terraces are provided for the rear penthouses (see Figure 13).



Source: iDraft Architects

Figure 13: Roof Plan

3.2.1 Gross Floor Area (GFA) & Floor Space Ratio (FSR)

The proposal is less than the maximum FSR of 4.5:1 achievable for the consolidated lots with site area of 2,204m². A summary of GFA of each level is described below (see Table 2).

TABLE 2: GROSS FLOOR AREA (GFA) BY LEVEL		
Site area: 2,204m ² Max. FSR: 4.5:1		
Level	GFA in m²	Floor Space Ratio (FSR)
Ground Level (374.85m ² retail)	680.55	4.2:1
Level 1	989.70	
Level 2	1075.60	
Level 3	1,068.35	
Level 4	433.25	
Level 5-14 (10 levels)	10 x 421.90	
Level 15	416.55	
Communal Roof Top	12.6	
TOTAL	9,918	

The proposal complies with the Floor Space Ratio for the site and provides 92 units in varying configurations which will suit a wide demographic. The proposal exceeds requirements for adaptable units. The proposal's compliance with other LEP and DCP controls are outlined in Section 4. Open Space and Deep Soil Landscaping are discussed in Section 4.8.2, where the proposal is more fully described, including a proposal to landscape adjacent road reserve land to the east of the site.

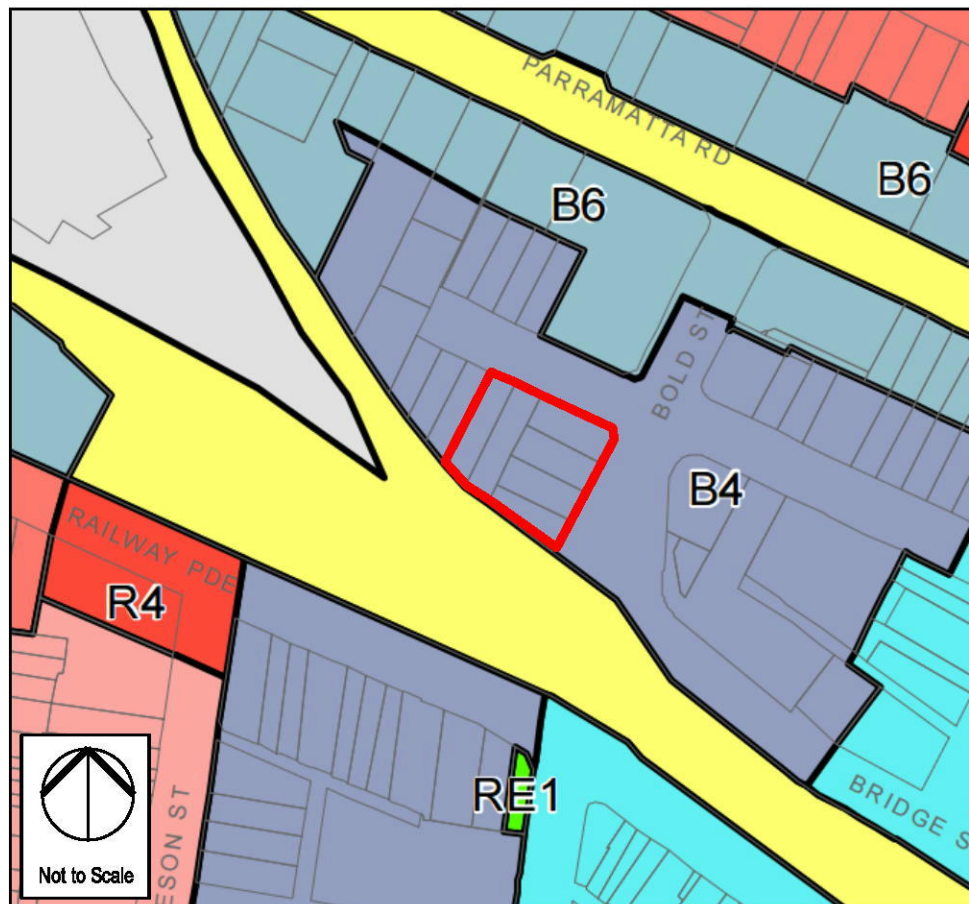
4.0 PLANNING CONTROLS

Pursuant to section 79C(1)(a) of the EP&A Act, this section assessed the compliance with the planning controls applicable to the site pursuant to the relevant heads for consideration. The relevant controls include:

- Parramatta Local Environmental Plan (LEP) 2011
- State Environmental Planning Policy (SEPP) BASIX – 2004
- State Regional Environmental Plan (SREP) Sydney Harbour Catchment 2005
- State Environmental Planning Policy (SEPP) No. 55 – Remediation of Land
- State Environmental Planning Policy (SEPP) Infrastructure 2007 – Sections 85-87
- State Environmental Planning Policy (SEPP) Urban Renewal 2010
- Parramatta Development Control Plan (DCP) 2011

4.1 Parramatta Local Environmental Plan (LEP) 2011

The subject site is zoned B4 Mixed Use under the Parramatta Local Environmental Plan (LEP) 2011, and shop-top housing is permissible with consent in the Zone (see Figure 14).



Source: Parramatta LEP 2011

 Subject Site

Figure 14: Zoning Plan

4.1.1 Objectives

The LEP Land Use Table contains the objectives for the B4 Mixed Use Zone. The relevant objectives are stated, inter alia:

Objective (a) - To provide a mixture of compatible land uses.

Response: The proposal is consistent with the B4 Zone land use and the emerging and future character of the area.

Objective (b) - To integrate suitable business, office, residential, retail and other development in accessible locations so as to maximise public transport patronage and encourage walking and cycling.

Response: The site is accessible to both rail and bus public transport and within walking distance of the Granville centre. The proposal provides residential and suitable retail uses in an accessible location.

Objective (c) - To encourage development that contributes to an active, vibrant and sustainable neighbourhood.

Response: The residential and retail use will enliven an area which is currently under-utilised has been earmarked for Mixed Use development.

Objective (d) – To create opportunities to improve the public domain and pedestrian links.

Response: The proposal will improve the site's relationship with the public domain by enlivening the ground floor pedestrian zone, proposes beautification of the site's boundaries and a landscaping treatment to the adjacent road reserve access to the railway. These will encourage pedestrian activity in the area.

Objective (e) - To support the higher order Zone B3 Commercial Core while providing for the daily commercial needs of the locality.

Response: Not applicable as the site is not in the vicinity of Zone B3 lands.

Objective (f) - To protect and enhance the unique qualities and character of special areas within the Parramatta City Centre.

Response: Not applicable as the site is not within the Parramatta City Centre.

In our opinion, the proposal is considered to meet the above objectives and provides a suitable mixture of compatible uses which will contribute to the neighbourhood.

4.1.2 LEP Development Standards & Provisions

A summary of our assessment of the proposed development against the LEP is in the following (see Table 3).

TABLE 3: PROJECT DATA / COMPLIANCE – PARRAMATTA LEP 2011			
Site Area: 2,204m ²			
Principal Development Standards	Requirement	Proposal	Complies
Height of Buildings (Max)	Site area of: > 2,100 ≤ 3,200m ² 39m > 3,200m ² 52m	52m	NO (see Section 4.1.3)
Floor Space Ratio (Max)	4.5:1	4.5:1	YES
LEP Provisions		Complies / Comments	
Permissibility	B4 Mixed Use Zone	Proposal is permissible within the zone	
Heritage Item	NO	N/A	
Conservation Area	NO	N/A	
Within the vicinity of Heritage Item	NO	N/A	
Acid Sulfate Soils	Class 5	(see Section 4.1.4)	

The proposal satisfies the relevant objectives of Council's LEP, is permissible in the zone and complies with the FSR development standards contained in the LEP. Whilst the proposal exceeds the Height of Buildings development standard, this is discussed in the following paragraph and an Application to Vary a Development Standard (Clause 4.6 Variation) contained in Annexure A of this SEE.

4.1.3 Height of Buildings

The maximum building height of 52 metres is dependent on the lot size. On these consolidated lots, the height limit is 39 metres; however this site is unable to be further enlarged due to the site constraints. The proposal does not prevent future consolidation of lots to the west of the site to provide a similarly sized lot.

The proposal has a height of approximately 51 metres, rising to 52 metres at the eastern side of the rooftop communal rooms, lifts and stairs. The proposal's height is considered to balance the scale of the podium and the site's location. The noncompliant height is centrally located on the site, is setback nearly 20 metres from the eastern side boundary, and causes no significant amenity effects to nearby residential buildings due to the additional separation provided by the existing roads and railway. Furthermore the building height is compatible with the heights of nearby approved and existing mixed use developments (see Figure 15 on the following page).

The key arguments contained in the Clause 4.6 Variation Application are, inter alia:

- Important site and landmark designed building;
- The proposal complies with FSR and generally requires with DCP requirements;
- The proposal does not result in any unacceptable overshadowing of residential dwellings due to the orientation and location, being adjacent to a railway corridor to the south;
- Due to the site location and constraints, the site cannot be further enlarged;
- The additional height is located centrally within the site and therefore minimises any effects;
- The proposal is similar to other approved Clause 4.6 variations in the vicinity.

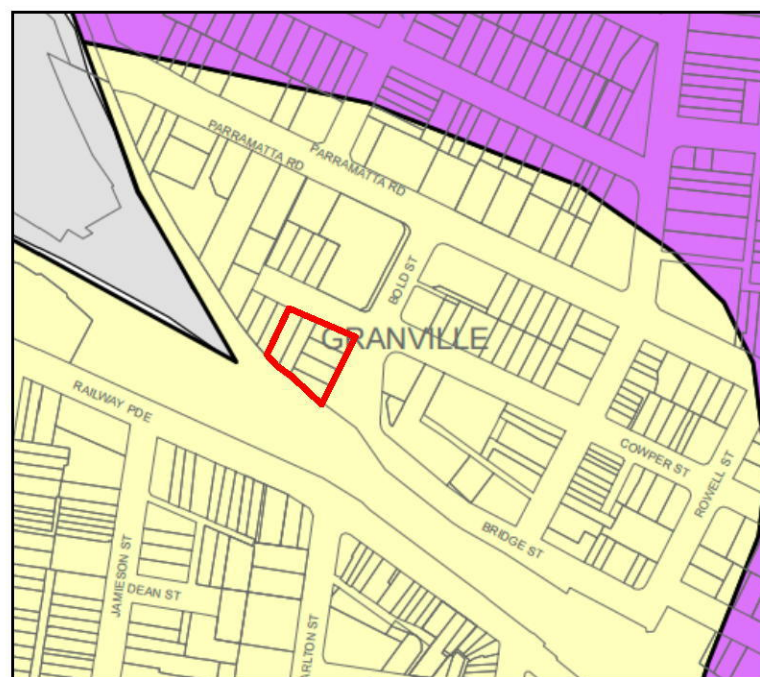


Source: Bing Maps

Figure 15: Nearby Large Scale Developments

4.1.4 Acid Sulfate Soils

The site is within Class 5 of Acid Sulfate Soils (ASS) and is approximately 200 metres from areas identified as being Class 4 of ASS (see Figure 16) and therefore ASS are to be considered under Clause 6.1 of the LEP.



Source: Parramatta LEP

Subject Site

Figure 16: Acid Sulfate Soils

According to the LEP, works within 500 metres of adjacent Class 1, 2, 3 or 4 land that is below 5 metres Australian Height Datum and by which the watertable is likely to be lowered below 1 metre Australian Height Datum on adjacent Class 1, 2, 3 or 4 land, requires assessment.

It is noted, the lowest point recorded on the survey of the subject site is RL11.81 and the land generally within 500 metres of the site appears to be at the 10 metre contour level or greater. According to the architectural plans, the basement level B2 does not extend below RL6.00 metres and is therefore still comfortably above the 5 metre AHD control.

A Preliminary Site Investigation Report prepared by SMEC Testing Services (separately submitted) noted the natural soils encountered on the site comprised silty clays and shale bedrock was encountered at 1.3 – 2.0 metre depths. The report stated, inter alia:

Further, our review of the Acid Sulfate Soil risk maps available on the EPA NSW Natural Resources Atlas also shows that the site is located in an area that is not expected to be affected by ASSs. This is supported by the geology and geomorphology of the site.

On the basis of the report, it is considered further investigation into the presence of ASS is not required for this site.

4.2 State Environmental Policy (SEPP) BASIX – 2004

SEPP (Building Sustainability Index: BASIX) 2004 was gazetted on 26 June 2004, and applies to the subject site. SEPP BASIX requires all new residential dwellings in NSW to meet sustainability targets for energy use and water use. In considering the merits of the proposal, it is appropriate to refer to the sustainability targets of the SEPP. A BASIX Report prepared for the proposed development (separately submitted) indicates that the proposal will satisfy the relevant water and energy reducing targets.

4.3 Sydney Regional Environmental Plan (SREP) – (Sydney Harbour Catchment) 2005

Sydney Regional Environmental Plan (SREP) - (Sydney Harbour Catchment) 2005 was gazetted on 28 September 2005 and applies to the subject site. Clause 13 requires the consent authority to consider the planning principles for land within the Sydney Harbour Catchment with the relevant principles relating to the water quality of urban runoff, risk of increased flooding and conservation of water. Additionally development is to avoid or minimise disturbance of Acid Sulfate Soils. The proposal is considered to satisfy the relevant clause (h) by providing a stormwater management plan (separately submitted) and as noted in Section 4.1.4, Acid Sulfate Soils are not likely on the site.

4.4 State Environmental Planning Policy (SEPP) No. 55 – Remediation of Land

SEPP No. 55 – Remediation of Land was gazetted on 28 August 2005 and applies to the whole of the State. Clause 7(1) requires the consent authority to consider whether land is contaminated prior to the consent of development on that land.

A Preliminary Site Investigation Report prepared by SMEC Testing Services (separately submitted) referred to aerial photographs from the 1920s onwards. These photographs demonstrate the sites were all residential dwellings until the 1970s, and dwellings continued to feature on several sites until the mid-1990s (see Figure 17 on the following page). The existing panel-beater use for No. 82 Cowper Street and the warehouse use at No. 80 Cowper Street are relatively recent uses.



Source: Department of Lands / SMEC Report

Photograph c. 1972

Photograph c. 1994

Figure 17: Aerial Photographs showing Residential Use of the Site

As the long-term previous uses for the site have been residential, the sites are unlikely to be contaminated. Additionally, according to the SMEC Report, the Section 149(2) Certificates issued by Council for each of the sites show there are no notices under the provisions of the Contaminated Land Management Act 1997 or site Audits, and the sites have not been licensed by Workcover for the storage of dangerous goods or listed on the Environmental Protection Agency (EPA) register for site contamination. On this basis, further investigation is not considered necessary.

4.5 State Environmental Planning Policy (SEPP) No. 65 Design Quality of Residential Flat Development

SEPP No. 65 Design Quality of Residential Flat Development was gazetted on 26 July 2002 and applies to the proposed development. A SEPP No. 65 Report has been prepared by Idraft which indicates the proposal is satisfactory with the majority of Primary Development Controls; Site Design and Building Design requirements (separately submitted).

4.6 State Environmental Planning Policy (SEPP) 2007 - Infrastructure

State Environmental Planning Policy (Infrastructure) 2007 was gazetted on 21 December 2007 and commenced on 1 January 2008, and applies to the whole State. The SEPP applies to the proposal due to the site's immediate proximity to the adjacent rail corridor. The relevant clauses within the SEPP are clauses 85 – 87.

The matters raised in Clause 85 relate to development immediately adjacent to rail corridors and include metal finishes on structures adjacent to rail corridors used by electric trains, and the use of a crane in the air space above the rail corridor. The consent authority is required to refer the application to the chief executive officer of the rail authority for comment. Testing of the conductivity of the site's soils was undertaken as part of preliminary site investigations by SMEC Testing Services (separately submitted). The investigation established the land use history was predominantly residential and the level of contaminants in the soil was low.

Excavation of greater than 2 metres within 25 metres of a rail corridor is also referred by the consent authority to the rail authority for comment and for concurrence, to consider the potential effects of the development on the structural integrity of rail infrastructure and its safe operation. The recommended methods of excavation to limit damage to nearby buildings and infrastructure have been outlined in the Geotechnical Report prepared by STS GeoEnvironmental Pty Ltd (separately submitted).

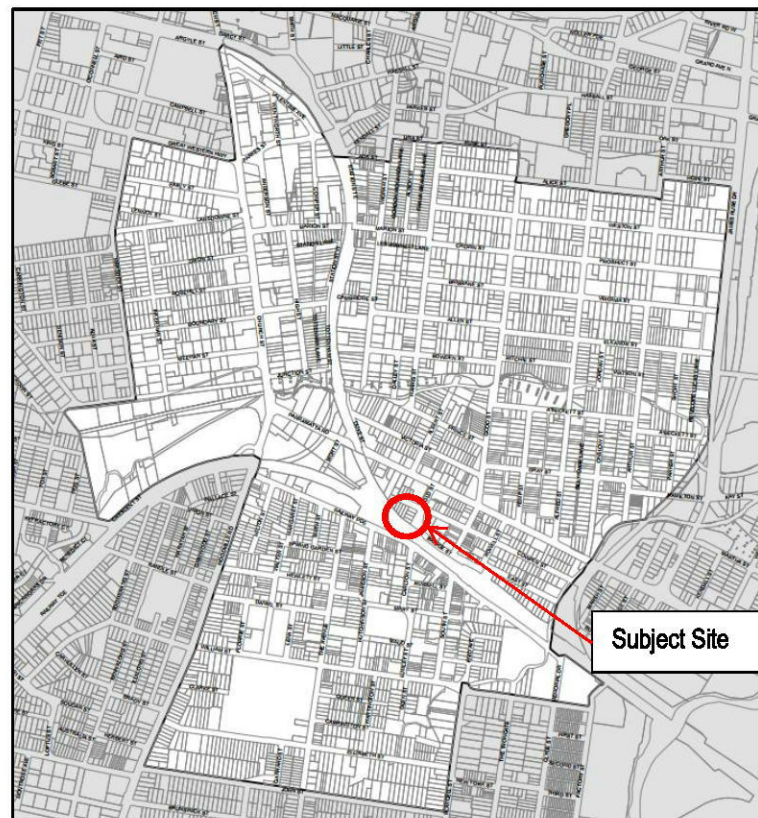
The effect of rail noise or vibration on a building for residential use adjacent to a rail corridor is to be considered under Clause 87 of the SEPP. The SEPP specifies noise attenuation measures to ensure the following LAeq levels are not exceeded, inter alia:

- (a) in any bedroom in the building—35 dB(A) at any time between 10.00 pm and 7.00 am,
- (b) anywhere else in the building (other than a garage, kitchen, bathroom or hallway)—40 dB(A) at any time.

An acoustic report prepared by Rodney Stevens Acoustics (separately submitted) indicates the proposal is capable of achieving the required levels.

4.7 State Environmental Planning Policy (SEPP) Urban Renewal 2010

State Environmental Planning Policy (Urban Renewal) 2010 was gazetted on 15 December 2010 and commenced on the same day, and applies to land within a potential precinct. The site is located in the area identified by the SEPP as the Granville Potential Precinct (see Figure 18). The SEPP applies to development if the proposed development has a capital investment value of more than \$5 million and is not exempt or complying development.



Source: SEPP (Urban Renewal) 2010

Figure 18: Granville Potential Precinct Map

Under the SEPP, the consent authority is to be satisfied that the proposed development is consistent with the objective of developing the potential precinct for the purposes of urban renewal and whether the proposal is likely to restrict or prevent the following, inter alia:

(a) The development of the potential precinct for higher density housing or commercial or mixed development,

Response: The proposal is for a mix use development which provides a higher density of housing.

(b) The future amalgamation of sites for the purpose of any such development within the potential precinct,

Response: The proposal amalgamates six existing sites to form a large lot suitable for a mixed use development.

(c) Access to, or development of infrastructure, other facilities and public domain areas associated with existing and future public transport in the potential precinct.

Response: The proposal does not restrict access or development of infrastructure and includes a landscaping upgrade of the adjacent Council-owned road reserve which provides vehicular access to the railway line for State Rail.

The proposal is, in our opinion, not likely to restrict or prevent other development for the purposes of urban renewal in the Granville Precinct.

4.8 Parramatta Development Control Plan (DCP) 2011

The Parramatta Development Control Plan 2011 came into effect on 12 October 2011 and applies to the subject site. An assessment of the proposal against the provisions of Part 4 - Special Precincts has been undertaken. The subject site is located within the Granville Town Centre Precinct.

Compliance of the proposal with the development controls in the Parramatta DCP is summarised in Table 4. Any non-compliances will be addressed separately in the section following Table 4.

TABLE 4: PROJECT DATA / COMPLIANCE - PARRAMATTA DCP 2011			
Provision	Requirement	Proposal	Complies
Part 2: Site Planning			
Views and Vistas	Encourage landscaping of streets to reinforce view corridors	Landscaping is proposed at ground level	YES
	Protect views to public domain	Views of public domain retained.	YES
Water Management	Not increase the potential flood affectation on other development or properties.	SWMP includes stormwater detention facility	YES
Public Domain	Address elements of the public domain.	The proposal addresses both Bold & Cowper Streets.	YES
Part 3: Development Principles			
Built Form and Massing	Height responds to the topography and the shape of the site.	Tower level is setback and centred in building to respond to the corner site and neighbouring development.	YES
	Proportion and massing relates to existing patterns in the street.	Podium relates to lower existing buildings in the streetscape.	YES
	Height and mass should not result in unreasonable loss of amenity to adjacent properties, open space or the public domain.	Adjacent building built to boundary, has no open space area and will not result in unreasonable loss of amenity.	YES
	Form and massing provides transition between adjoining land use zones and building types.	Podium provides transition.	YES

Building Facades and Articulation	Facades modulated and articulated to reduce the appearance of bulk.	All facades are modulated and articulated.	YES
	Facades designed with horizontal and vertical elements.	Facades balanced with horizontal and vertical elements.	YES
	Building frontages and entries provide a sense of address and visual interest.	Proposal provides sense of address and visual interest.	YES
Balconies and Eaves	Balconies and eaves do not project more than 800mm beyond building.	All balconies and eaves are within building envelope.	YES
Energy Efficiency	BASIX rating >40%	BASIX rating >40%	YES
Streetscape	Articulated to address each street frontage and are to define prominent corners.	High quality design addressed street frontages and defines prominent corners	YES
	Vehicular access points minimised to maintain continuity of the streetscape.	Basement entry located near driveway of adjacent property.	YES
Development in B4 Zone	Ground floor frontage provides for active non-residential uses.	Two retail tenancies at ground floor frontage.	YES
	Ground floor retail and business shopfronts minimise solid walls, and maintain a fine grain, human-scale.	Ground floor frontage is articulated in sections. Glass doors to Retail.	YES
	Continuous awnings provided where buildings align to the front boundary	Awning and a colonnade provided.	YES
Landscaping	Landscaping for streetscape character.	Landscaping provided to both streets and rear setback.	YES
	Trees planted at the front and rear of properties.	Trees proposed to front footpath and rear setback.	YES
Basement Car parking	Soil depth 1m where basement car parking extends beyond building	Generally complies	YES
Private and Communal Open Space	Private open space for all dwellings from the living area.	POS provided to all dwellings from living areas.	YES
	Located to maximise solar access	POS located on northern and western facades maximise solar access.	YES
	Outlook, orientation, size, shape, enclosure and landscape treatment.	POS has views to Parramatta CBD and public domain. Balconies appropriate for size and massing of building.	YES
	Communal open space to be include uses such as BBQ or play areas or passive amenity	Proposal includes play and passive areas.	YES
	Provide a landscaped setting with opportunities for large and medium size tree planting	Rear open space area includes deep soil landscaping and tree planting.	YES
Residential Flat Buildings and residential component of Mixed Use Development	Min 10m ² of private open space per dwelling Min dimensions of 2.5m.	Min 10m ² provided.	YES
	Min 10m ² of communal open space per dwelling is to be provided.	17m ² of communal space provided per dwelling and rear setback.	YES
	Balconies and decks to minimise overlooking of living areas, private open spaces of adjoining dwellings	High quality design minimises overlooking through the use of angles and partition walls	YES

Visual and Acoustic Privacy	The windows and internal layout designed to reduce noise transmission.	Separation of incompatible rooms and living areas	YES
	Balconies to face the street or another element of the public domain.	Each façade has balconies. They overlook the street, the podium or to the south.	YES
	Building separation to provide communal open space and significant landscaping.	Rear setback provides courtyard with significant landscaping.	YES
Acoustic Amenity	Acoustic report required for site adjacent to railway corridors	Acoustic Report with recommendation for glazing	YES (Refer to Section 5.2.2)
Solar Access	Dwellings within the development receive min 3 hours sunlight in habitable rooms and in at least 50% of the private open space between 9am and 3pm on 21 June.	Refer to architectural drawing 28 – Solar Access and SEPP 65 report	Generally complies
	Adjoining properties receive min 3 hours sunlight in habitable rooms and 50% of the private open space between 9am and 3pm on 21 June	Solar access provided	YES
	Living areas to be on northern side and service areas on southern or western sides.	Dwellings on northern and western facades are as described.	Generally complies
Cross Ventilation	Buildings to have narrow cross sections, providing dual aspect for cross ventilation.	Cross ventilation provided	YES
Stormwater Management	Control and disposal of stormwater run-off from the site to prevent adverse impact on Council's stormwater drainage systems Stormwater plan required	Stormwater Plan provided	YES
Waste Management	Waste minimised by reducing, re-using and recycling demolition, construction and general waste.	Waste Management Plan provided	YES
Access for People with Disabilities	Access meets requirements of the Disability Discrimination Act, 1992 (DDA), the relevant Australian Standards and the Building Code of Australia (BCA).	Access Report states capable of compliance	YES (see section 5.4.1)
Safety and Security	Direct access from car parks to dwellings for residents.	Direct access from basement levels to dwelling via two lifts.	YES
	Entrances to residential apartments separated from entrances	Retail tenancies separate to residential apartments' entry.	YES
Car Parking Rates	128 spaces	128 spaces	YES
Part 4: Special Precincts - Granville Town Centre			
Front Setback	Frontage to Cowper & Bold Streets 4 storeys/15.0 metres – Nil setback with awning	Nil Setback	YES (see Section 4.8.1)
	Additional 3.0m setback >4 storeys	>3.0m setback to upper levels	
Rear Setback	<25.0m height: Min 9.0m	<3.5m Height: 6.0m (Gym) 15.0m Height: 9.0m (Podium)	Generally complies (see Section 4.8.1)
	>25.0m height: Min.12.0m	52.0m Height: 11.0-12.5m (Tower)	

Side Setback	<4 storeys (15.0m). Nil side setback >4 storeys in height: Min. 9.0 metres - habitable rooms Min. 6.5m - non-habitable rooms.	<4 storeys/15.0m – Nil side setback >4 storeys – 14.0-14.5m	YES (See Section 4.8.1)
Site Frontage	Min frontage to street 45m	47m	YES
Land Amalgamation	Maximise lineal street frontage	Dual street/corner frontage.	YES
Landscaping and Deep Soil	Min 30% of site to be deep soil area zone	26% - 575.3m ²	Almost Complies (see Section 4.8.2)
Development between Parramatta Road and the Railway Line	Casual surveillance of public spaces from residential and commercial apartments.	Casual surveillance provided.	YES
	Max building depth 25m	10-24m	YES

The proposal complies with the majority of the relevant DCP controls including front and side setbacks, parking, frontage requirements, communal open space and private open space, solar access, privacy and amenity. As well, the proposal generally complies with the DCP provisions relating to rear setbacks and deep soil area. Those two areas that do not fully comply with Council's DCP provisions are discussed in the following Sections.

4.8.1 Rear Setbacks

A rear setback of minimum 9 metres is required for development up to 25 metres in height. The subject site adjoins railway land to the rear. The rear setback of the site is approximately 6 metres for the basement levels and between 6 metres and 11 metres for the first three storeys. A minimum rear setback of 12 metres is required for development above 25 metres within the B4 zone in accordance with Section 4.1.6 Clause 2(ii). The proposed development above 3 storeys is set back at least 11 metres from the rear boundary. Any encroachments are generally minor, such as a balcony corner on the south-western corner and part of two bedrooms and bathroom on the southern side. None of these encroachments will have detrimental effects to nearby properties because of the substantial distances between these and the proposed development. The single storey resident gymnasium encroaches 3 metres into the rear setback, however this is considered acceptable given the temporary nature of the use. Further, the minor encroachments will not have significant effects on the future residents of the proposal. As noted, the rear setback will be landscaped communal open space to present a pleasant outlook from the resident gymnasium and from the entry foyer (see Figure 19 on the following page).



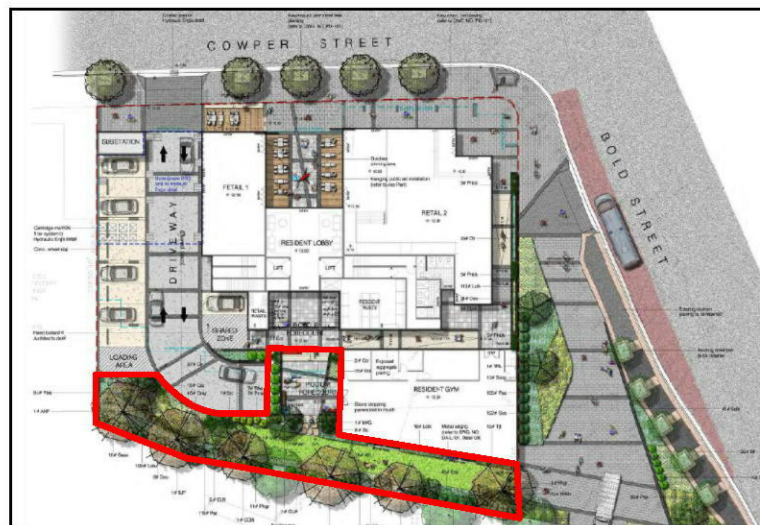
Source: Idraft Architects

Figure 19: The proposal as viewed from the rear garden

4.8.2 Open Space & Deep Soil Landscaping

The DCP requirement for deep soil is 30% of the site area which equates to 660.7m², the majority of which should be located at the rear of the site. The proposal's deep soil area is 330.35m² or 15%, which is principally provided at the rear of the site. The proposed deep soil increases to 575.3m² or 26% of the site area, with the inclusion of planter boxes on the site. The 4% shortfall is considered reasonable given the expansive open spaces areas provided, and when the extensive perimeter planters on the podium and roof top level are considered. As noted in the DCP Compliance table, the proposal is 70% greater than the minimum requirement for communal open space and all units comply with the minimum 10m² of private open space.

In addition to the rear landscaped setback, the proposal provides extensive landscaped rooftop gardens, including large common areas at the Podium Level, and the roof top area of the residential tower (see Figures 20 & 21 below and Figure 22 on the following page).



Source: Idraft Architects Common Areas

Figure 20: Podium Level Common Open Space



Source: Idraft Architects Common Areas

Figure 21: Podium Level Common Open Space



Figure 22: The Rooftop Private and Common Garden Areas

Source: Canvas Landscape Architects

Figure 23: Landscaping of adjacent Road Reserve



Source: Jon Johannsen

Figure 24: Potential trafficable landscaped treatment for Road Reserve

In summary, the proposal is permissible with Council's consent and is consistent with the objectives and majority of the controls examined under the DCP. The proposal complies with Council's front and side setback controls and site frontage controls. Although the proposal does not comply with the all rear setback controls, it is in our opinion that the proposal is consistent with the objectives relating to these controls and will not adversely affect the amenity of the area. This is particularly the case because the site adjoins a railway line and there are no nearby dwellings.

5.0 PLANNING ASSESSMENT

This section will consider the following: The assessment of the Natural Environmental Impact; the Built Environment Impacts; the Site Suitability and the Public Interest in accordance with Section 79C(1)(b),(c) and (e).

5.1 Assessment of Natural Environmental Impact – S.79C (1)(b)

5.1.1 Topography & Scenic Impacts

The site is almost level, slightly elevated above the adjacent railway tracks and below the ramp to the Bold Street Bridge over the railway. The proposed landscaping of the road reserve land to the east of the site will provide a transition and visual separation between the bridge approach and the site and the landscaped rear setback will provide a visual buffer to the railway.

Landscaping on the site and adjacent road reserve will create substantial communal open space areas to benefit residents and contribute to the scenic amenity of the public domain. The rear setback's landscaping will screen the railway view and provide a pleasant outlook from the resident's gym and adjacent garden areas. The podium level and roof level will include communal terraces landscaped with artificial turf, and planters containing shrubs and trees. This is in addition to the soft green edges created by perimeter planters on the podium and roof top levels. For further details, refer to the Landscape Plan, prepared by Canvas Landscape Architects (separately submitted).

As indicated, the site is within a Class 5 Acid Sulfate Soil Zone however on the basis of the submitted Preliminary Site Investigation Report, the proposed excavation is unlikely to encounter ASS. Given the predominantly residential use on the site and the site investigations undertaken; in addition to reviews of Council and EPA records; the site is unlikely to be contaminated. Excavation will be undertaken in accordance with Council's standard conditions of consent and the submitted Geotechnical Report, to minimise any effects on the surrounding area.

5.1.2 Micro-Climate Impacts

The proposed development is unlikely to result in any adverse effects on the micro-climate in the locality.

5.1.3 Water & Air Quality Impacts

As previously noted, the proposed development is, in our opinion, unlikely to result in any adverse effects on the locality in terms of water and air quality. Measures are to be undertaken in respect of the stormwater and runoff and accordingly, the proposal is, in our opinion, appropriate in this regard. For further detail refer to the Stormwater Management Plan, prepared by Umbrella Civil Consulting Engineers (separately submitted).

5.2 Assessment of Built Environment Impacts – S.79C(1)(b)

5.2.1 Impact on the Area's Character

According to Council's DCP, the Granville Town Centre Precinct is planned to be a vibrant place with a variety of activities within and surrounding the centre. This is to be achieved through a mix of uses including residential apartments, and increased building heights and densities.

The subject site has not been used for residential purposes for some decades. However, it is in an area undergoing transition to mixed use development, in line with Granville Town Centre provisions. The change of use will increase the density on the site; however, the Precinct Plan recognises the need for change in densities to support the role and function of the Granville Town Centre. Additionally, the existing two storey commercial buildings and those nearby are reaching the end of their usable life and are likely to be replaced with similar mixed-use buildings.

Increasing the density of the subject site will increase the viability of the Granville area and be an effective use of the site located near a transport hub. The proposal will provide additional housing and retail space, within an architecturally designed development. As discussed earlier, the bulk and scale are comparable and compatible with the future desired character of the area (see Figures 25 & 26 below and Figure 27 on the following page).



Source: Idraft Architects

Figure 25: The proposal as viewed from the corner of Bold Street and Cowper Street



Source: Idraft Architects

Figure 26: The proposal as viewed from Cowper Street



Source: Idraft Architects

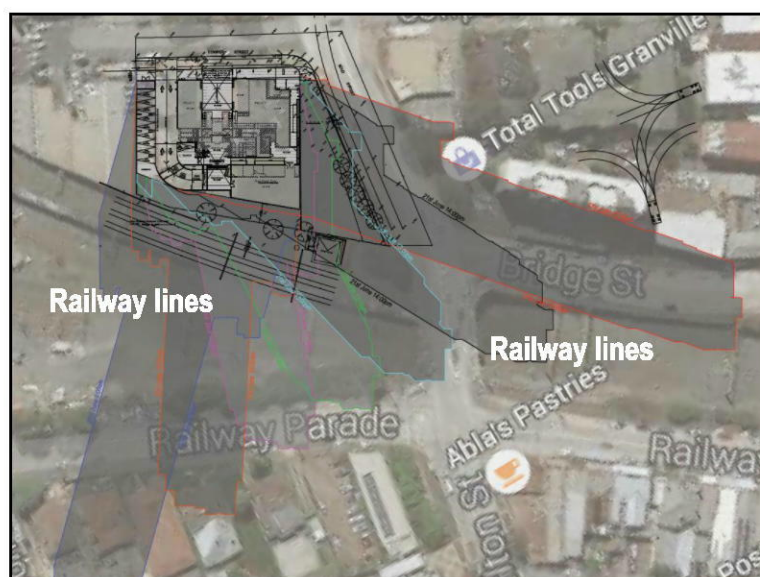
Figure 27: The proposal as viewed from Cowper Street

5.2.2 Aural and Visual Privacy Impact

Aural and visual privacy is provided for existing and future residents nearby and for the future occupants of the proposed building, by the proposal's design and the distance to nearby buildings. Given the proximity to the train line, there will be some noise impacts, however mitigation methods are proposed in the Acoustic Report, prepared by Rodney Stevens Acoustics (separately submitted). Measures will include the recommended glazing type for windows. Visual privacy will be maintained by the skilful design of the development as well as the considerable distance between the proposed development and nearby dwellings.

5.2.3 Impact on Sunlight Access

Due to the distances to nearby residential areas along Cowper Street and to dwellings on the southern side of the railway line, the proposal is unlikely to significantly affect solar access. Figure 28 demonstrates the proposal will have minimal overshadowing impacts on 21 June as shadows from 10:00am until 2:00pm will generally fall only on the roadways or the railway lines. Therefore solar access to nearby residents is largely unaffected by the proposal.



Source: Idraft Architects

Figure 28: Overshadowing of Roadways and Railway lines

5.2.4 Waste Management

Residential waste facilities will include waste cupboards in each suite and a communal waste chute on each floor to the general waste and recycling bins on ground floor level. The bins will be wheeled out by the caretaker for collection. Commercial waste facilities are separately located on the ground floor to serve the retail spaces. The bins will be collected by a commercial waste contractor. The Waste Management Plan (separately submitted) contains details of the construction waste management.

5.3 Assessment Of The Site Suitability - S.79C(1)(c)

This section will consider the proximity of the site to services and infrastructure; car parking; hazards; safety, security and crime prevention; and construction.

5.3.1 Proximity to Services and Infrastructure

As indicated, the subject site is ideally situated in terms of access to transport infrastructure. It is in close proximity to Parramatta Road and is well serviced by public transport through both the train and bus networks. The transport hub of Granville Railway Station is approximately 280 metres south-east of the site and a bus stop for Route No. 906 is 150 metres away on Cowper Street. As the site is within an established area, electricity, telephone, water and sewerage are also readily available.

5.3.2 Car Parking

The majority of the proposed car parking is provided in the two basement levels and complies with DCP requirements. Ten visitor car parking spaces are provided on the ground level, with 118 car spaces provided in the two basement levels. Six accessible spaces are provided on Basement Level 2 and five (including one accessible space for the retail areas) are provided on Basement Level 1. An accessible space is provided in the Visitor parking area on the Ground Level (see Table 5).

TABLE 5: CAR PARKING PROPOSED		
Parking	Requirement	Provided
1 Space per 40m ² Retail Floor Area	10	10
1 Space per 1 or 2 Bedroom unit	77	95
1.2 Spaces per 3 Bedroom unit	18	
0.25 Visitor Space per Unit	23	23
Total	128	128

According to the Traffic Report prepared by MultiPro Consultants Pty Ltd (separately submitted), the proposal complies with the number of spaces and required geometry under Council's DCP and AS 2890.1:2004. In addition to this, the Traffic Report concludes the development will have only minimal impact on traffic generation on the surrounding road network. Therefore the proposal is considered appropriate from a traffic and parking point of view.

5.3.3 Hazards

Council has indicated that Cowper Street is vulnerable in rain events to flooding. This has been addressed by the provision of below ground on-site detention as outlined in the Stormwater Management Plan, prepared by Umbrella Civil Consulting Engineers (separately submitted). The site is not in an area recognised by Council as being subject to landslip, bushfire or any other particular hazards. The proposed development will not increase the likelihood of such hazards.

5.3.4 Safety, Security and Crime Prevention

The proposed development has been carefully designed to adhere to 'Crime Prevention through Environmental Design' (CPTED) principles. Secure and well lighted entry and walkways are provided throughout the site for improved pedestrian visibility. The proposal will enliven the area by including increased activity and natural or passive surveillance. These are likely to have a positive impact on safety and crime prevention in the area. Furthermore, the communal and public areas throughout the proposed development will be actively maintained, which acts as a deterrent to crime. This is further discussed in the SEPP No. 65 report, prepared by IDraft Architects (separately submitted)

5.3.5 Construction

Construction work will be carefully managed to reduce potential impacts. According to the acoustic report, prepared by Rodney Stevens Acoustics (separately submitted), the site is unlikely to generate unusual or exceptional noise impacts with construction strictly limited to the hours of 7:00am to 5:00pm on weekdays and 8:00am to 5:00pm on Saturdays only. Further recommendations in relation to noise reduction, are contained within the Acoustic Report.

Any noise and vibration impacts on adjoining developments during excavation would be managed under the recommendations provided in the geotechnical report, prepared by STS GeoEnvironmental Pty Ltd (separately submitted).

5.4 The Public Interest - S.79C(1)(e)

This section will consider the social and economic effects of the proposal and the public interest.

5.4.1 Social and Economic Impact

The well-designed shop-top housing proposal will make a positive contribution to the Granville area that will contribute to the residential uses in the Mixed Use Zone, and expand retail uses in the area.

In order to provide accessibility to the development, Council requires 10% of sole occupancy units to be to adaptable, accessible parking be provided and access to the building for people with a disability. An Access Report prepared by Accessible Building Solutions (separately submitted) states, inter alia:

On the basis of the above assessment, I am satisfied that the proposal can achieve compliance with the access provisions of the BCA, AS4299 essential requirements for Adaptable housing and SEPP 65 requirements of LHA Silver level units.

The proposal will provide employment during demolition and construction and in the provision of maintenance services once the building is occupied.

5.4.2 The Public Interest

The proposal has been designed with consideration of the adjoining residents' amenity and the streetscape. The contemporary appearance and well-designed building and surrounds will contribute to the streetscape and provide additional benefits to the area. These benefits include a variety of residential accommodation close to the Granville Town Centre and public transport which reduces reliance on private car use, and ground floor retail uses which will service nearby light industrial and commercial users and residents. The proposal is a high quality development which will positively contribute in the locality and satisfies the objectives of the Zone.

6.0 CONCLUSION

The proposed development has been assessed in light of Section 79C of the EP&A Act, 1979 and Council's planning instruments. The shop-top housing is permissible in the B4 Mixed Use Zone, under Council's LEP 2011 and in our opinion is consistent with the relevant objectives.

The proposal is less than the maximum FSR of Council's LEP, being 4.2:1 where 4.5:1 is permitted. However, whilst the building height complies with the zone limit stipulated in the LEP, the proposal does not comply with the height of buildings when based on the site size. A Clause 4.6 Variation Application for Height of Buildings is submitted with the development application which outlines how the proposed height is appropriate, given the nature of the site. The key argument for the height is the site's prominent location and context being many larger buildings in the immediate area. The site is in an area earmarked for an increased density and is in close proximity to public transport options which make it ideal for the development proposed. As well, the Clause 4.6 Variation notes there is no opportunity to enlarge the site by further consolidation as the site is bounded by roads and railway on three sides.

As highlighted earlier the amended design has responded to concerns raised by Council in a pre-DA submission. There has been a reduction of one storey, changes to internal unit layouts, changes to on-site detention and other recommended changes following comments from Council.

The proposal complies with the front and side setback controls, site frontage controls and car parking controls under Council's DCP. Whilst the proposal does not fully comply with the rear setback controls, in our opinion the development is consistent with the objectives of these controls as the areas of non-compliance on the building are not substantial and the majority does comply. The single storey resident gymnasium is within the rear setback of six metres and overlooks the rear communal open space.

The design and external appearance of the proposed development is appropriate and compatible with nearby development and will positively contribute to the locality. The proposal is not likely to result in a significant level of overshadowing or loss of privacy of nearby properties.

There are a number of consultant reports that accompany this Statement of Environmental Effects. These documents have verified the nature of the soils, geotechnical soundness, SEPP No.65 requirements, BASIX and landscaping. The Traffic and Parking Report confirms that the proposal will not unreasonably impact on the surrounding road network and will improve the parking conditions beyond the existing generation.

For all of the above reasons, in our opinion, the proposal is an appropriate development for the subject site and is in the public interest.