

Contact: 9748 9999 (JG)

22 May 2020

Ms. Samantha Wilson
Associate Director, Urbis
Angel Place, Level 8, 123 Pitt Street
Sydney, NSW, 2000

Dear Ms Wilson,

Re: DA 2019/143 (11–17 Colombia Lane, HOMEBUSH)

I write to advise that Council briefed the Sydney Eastern Planning Panel on the subject proposal to construct a mixed use residential tower development at the above address on 14 May 2020. At this meeting, the Panel recommended an opportunity be afforded to the Applicant, prior to determination, to ascertain whether significant amendments to the design would be considered that address Council's outstanding concerns. Provided below are the matters discussed with the Panel, for your consideration.

OVERSHADOWING

Impacts on properties to the west

The shadow diagrams submitted do not provide certainty that the properties to the west (14 – 16 Station Street) receive adequate sunlight at mid winter (minimum 2hrs) to maintain the amenity of the occupants of the premises.

Council's Architect has requested clearer diagrams which demonstrate the impacts on individual apartments, contemplating current and future shadows and the different orientations of individual apartments.

Commentary regarding evolution of the design to minimise impacts to the west is noted. However, Council determines there to be potential to reduce cumulative impacts through additional stepping of the building and setbacks along Powell's Creek. It is evident the proposal seeks to utilise the floor space ratio allowance to its maximum extent, however it should not be at the detriment of the amenity of the units within the development or on neighbouring sites. Use of the FSR allowance is currently having a negative impact on achieving a site responsive, detailed design with regards to overshadowing, bulk and scale.

Future development to be considered

Solar access diagrams and overshadowing diagrams must include building massing for the 'Kennard's site' that accurately depicts the development potential as represented in the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS). It is noted the Sydney Eastern Planning Panel initially deferred the Planning Proposal for a number of reasons including this concern; deciding it should be addressed at DA stage. The proposal, as submitted, inadequately addresses this issue.

Overshadowing / solar access for communal open space

Ground floor communal open space adjoining Powell's Creek

The Design Review Panel (DRP) raised serious concerns regarding the impact of the podium and 8-storey gallery cut-out on the ground floor communal open space adjoining Powell's Creek. They also raised the issue of the south facing apartments orientated into the gallery and concerns relating to ground floor connectivity. These issues all remain unresolved.

The application includes the ground floor landscaped area in communal open space calculations, contributing 1,631m² to the total 3,798m², however adversely, it is only 77.9m² which receives the minimum 50% direct sunlight for 2 hours in mid-winter as recommended by the Apartment Design Guide (ADG).

Major improvements in solar access to the communal open space is required. Significant change is to be considered in combination with issues relating to site lines along Powell's Creek and setbacks that improve the development's interface with Powell's Creek and Gramophone Lane. While Council acknowledges the area is constrained by an overhead power line easement, the design should contemplate a better, integrated interface with Powell's Creek following the future decommissioning of the substation and delivery of the Powell's Creek open space.

Triangular ground floor communal open space area

Council notes improvements to the triangular communal open space. However, solar access remains an issue and solar access diagrams included with the architectural drawings indicate the requirements of the ADG (50% / 2 hour solar access) is not achieved. The area where solar access is achieved appears to be paved and adjacent to the bin collection area. This is not considered a practical use of space.

The inclusion of the BBQ area and shade sail do improve the amenity of the communal open space on Level 8. However, this is a relatively small and exclusive congregational area with regard to the number of apartments/future residents and impacts to solar access for the ground level communal open space. More could be done to achieve greener and more interesting above ground communal open space.

Noting the value above ground communal open space provides, these spaces cannot be used to justify a building design that does not prioritise the delivery of solar access for communal open space at ground level as these spaces are likely to be more accessible and provide greater public benefit through aesthetic improvements. The solar access challenges

emphasise the need for greater setbacks and clear well landscaped pedestrian connections to surrounding public open space.

APARTMENT AMENITY

It is the opinion of Council that the proposal represents a mediocre, marginally compliant design in terms of solar access, cross flow and ventilation standards under the ADG. Whilst it is understood that the ADG determines a minimum threshold criteria, future development within the Parramatta Road corridor should reflect the spirit of the PRCUTS and deliver design excellence. Council agrees with the DRP that a redesign of the buildings could improve the overall amenity of apartments, ground floor communal open space areas, the public domain and neighbouring development and undeveloped sites. The following is not an exhaustive list of issues that remain unresolved, and is provided to direct consideration:

- i. Apartments A1.01, repeated above. Council remains unsupportive of this corner of the building. A combination of limited cross ventilation and limited solar access is a poor outcome. The amendment to the balcony doesn't appear to improve either of these issues;
- ii. Apartments B1.01, B2.02, repeated above. The design response elected to resolve Council's concern was to raise the sill height. This is not considered particularly innovative and does not propose a solution reflective of 'design excellence'. The DRP suggested design solutions along this part of the building that could improve amenity, increase diversity of apartments and create interest in the façade treatment. Council agrees that a creative response is needed to resolve amenity issues for these apartments. It is noted the Acoustic Report accompanying your application references the need for additional natural ventilation methods, which are lacking in the design. The ADG recommends plenums for single aspect apartments and it is evident this has not been explored;
- iii. The new 3-bedroom design in *Building A* results in bedrooms adjoining living and dining areas. This is inconsistent with the design principles included in the Acoustic Report accompanying your application which states that "*bedrooms of one dwelling do not adjoin living rooms of adjacent dwellings*". There are numerous examples of this contradiction within the development;
- iv. Operable screens for balconies could improve the building articulation and help manage solar access for the northern orientated apartments;
- v. A number of apartments do not achieve storage requirements under the ADG. A development of such high density should provide an adequate provision of residential storage to its occupants.

Council's architect has requested that any revised material detail in specific terms, the apartment layouts with solar overlays to ensure living areas and private open spaces are receiving the minimum of 2 hours of sunlight. Such information should be illustrated using contrasting colours for solar/non-solar access areas and correspond with 3D modelling. Further, cross flow diagrams are to include arrows to clarify the movement of air through apartments. To date, this information has not been provided to Council and hinders a thorough interrogation of the proposal.

BUILDING DESIGN

As previously advised, Council shares significant concern with the matter of the residential towers leading the design resulting in substandard outcomes for the podium design and gallery area. These features of the development influence solar and cross flow issues (as outlined above) and compromise the standard of the development. Whilst these issues have been previously noted by Council and the Design Review Panel, they continue to remain unresolved.

- i. The circulation core for Building A serves 11 apartments and the corridor widths are substantially longer the 12m design standard. The ADG is specific in its direction that a variation requires a higher level of amenity for common lobbies, corridors and apartments. The amenity of many apartments in this area is substandard (as noted above). It is unclear whether the gallery will receive solar access and by and large, the common spaces do not achieve design excellence. The Urban Design report accompanying your application refers to the new opening of the corridor at the western end, which improves upon the original scheme. However the corridor still appears to be relatively narrow, with standard ceiling heights and it is unclear how much solar access this space would receive. The ADG recommends increased ceiling heights, wider corridor widths and break out spaces with windows;
- ii. In total, the number of lifts serving apartments exceeds the 40 apartments per lift recommendation, with over 60 apartments per lift. Further, the circulation core for Building B also exceeds the eight apartment benchmark, with circulation spaces providing little amenity.
- iii. The podium design does not reflect the transitions in height objectives detailed in PRCUTS and emphasised in previous Council correspondence. Noting the submitted Urban Design Report refers to a desire to match surrounding built scale, Council considers alternate design options are necessary. Council considers inclusion of measures such as splitting the podium at the third or fourth floor, incorporating landscaping along the split, providing large and distinctive setbacks and annexing landscaped elevations, will soften the towers outward appearance and contribute a depth in public presentation and visual relief;
- iv. Increased widths of entry points are noted, however the podium design and gallery limits sight lines from entry points and gating the entry points are discouraged. Other forms of internal security could open up movement between communal open spaces and should the north western corner of the building be significantly set in, would improve movement and sight lines along Powell's Creek and the future linear open space. Improvements to drawing presentation, with perspectives, sight lines and solar access to specific spaces would aid Council's interpretation of the design.

PUBLIC DOMAIN

Gramophone Lane

Council has significant concerns regarding the interface of the development with Gramophone Lane. The development 'turns its back on' an active transportation corridor and does not present a pedestrian friendly environment along the corridor that links the

development, surrounding developments and the triangular communal open space to the Powell's Creek linear open space. It should be noted that the Powells Creek linear open space provides regional links to greater Sydney. Key limitations for this area include:

- i. The location of the basement car park access, in combination with the existing basement access to the residential tower development at 6 – 18 Colombia Lane, concentrates car movements along the link to the Powell's Creek linear open space;
- ii. The setback along Gramophone Lane provides a 6 metre distance from the boundary to the primary building façade. However, this does not result in an activated or interesting interface with the public domain. On the western side of the basement car park ramp, the depth of private open space restricts pedestrian movements to a narrow footpath (approximately 2m wide) and landscaping treatments do not indicate an interesting outcome that softens the public/private interface. In this location, the building does not incorporate stepping or consider alternatives to modulate the built form; presenting little articulation. Increased setbacks are required to allow for a pedestrian orientated environment coupled with modulation of the building and significant improvements to landscaping within the public and private domain.
- iii. The submitted Urban Design report refers to generous planter boxes however these are approximately only 1.2m in depth and little detail is provided on how they are to be arranged. The expectation of design excellence along this frontage requires a variety of landscaped spaces in different locations and at different levels. Landscape strips with mature trees along the footpath should be provided, which will require revisions to setbacks. Council notes the basement car park limits opportunity for deep soil landscaping along Gramophone Lane, however upon considering the traffic and parking comments in this letter, Council believes this can be reviewed and deep soil landscaping provided. The design guidance for the public domain interface outlined by the ADG should be exceeded to achieve a higher standard and showcase a credible development of design excellence as one of the first development under PRCUTS in the Homebush Precinct.
- iv. The northwestern corner of the building restricts sight lines along the corridor, creating concealed spaces and an imposing built form with inadequate spatial relief adjoining a key public asset for the future community within the Homebush Precinct. This undesirable outcome also influences the lack of solar access to the ground floor communal open space within the site and adjoining Powell's Creek;
- v. Ground floor private open spaces on the eastern side of the basement car park ramp and retail spaces are pushed out to approximately 2m from the property boundary. Council acknowledges this design feature of the podium allows for a more human scale at street level, however the building setback should be increased further to support additional landscaping along the street whilst retaining the first floor stepping of the podium and associated human scale;

The submitted documentation ignores how Gramophone Lane integrates with the Stage 1 Powell's Creek works and the timing for delivery of this work. This is also true of the future of the overhead power lines. Council considers this an important piece of the context material that should be detailed in any landscape plan.

In considering the impacts of overshadowing on the proposed communal open space area and the movement of pedestrians in and surrounding the development, accessibility to the

Powell's Creek linear open space area is to be prioritised. The Powell's Creek active travel corridor is a local asset and will service occupants of surrounding developments. As such it is vital that the development account for its contribution through a redesign which contemplates safe paths of travel, accessibility without conflict and soft transitions from residential density to public open space.

Powell's Creek

As previously emphasised, the north western corner of the building does not provide sufficient spatial relief adjoining Powell's Creek. This restricts a sense of space, limits sight lines and solar access for ground floor communal open space. Again, further design refinement is required to improve the outcome in this location.

Nipper Street

The extension along Nipper Street for vehicles is not supported. Council will support the introduction of bollards to the south to allow for access by emergency service vehicles, however the Nipper Street extension is to facilitate a principally pedestrian orientated environment.

It is noted that heavy vehicles are to be re-routed around the site, utilising Colombia Lane, however it is pertinent that this is tested as a viable solution and capable of accommodating all vehicle activity.

The Applicant should incorporate additional landscaping in spaces previously required for parking along Nipper Street.

The landscaping outcome for the planter boxes also requires more detail and a much greener outcome for this area is desirable. The mature tree height along Nipper Street, with the new 1m stepping, should be clarified in landscape plans. Considering traffic and parking comments, if the deep soil zone can be extended to capture the park side edge of Nipper Street, mature trees along the path would be ideal.

Colombia Lane

At the south eastern corner of the site, the podium stretches out to within a metre of the property boundary (Level 2-6 Architectural Drawings). At ground level, this area incorporates the edge of the bin collection area (refer to Section 6 for waste collection design comments).

The amenity of the south eastern corner of the site appears to have been neglected. It is expected that pedestrian movement along Nipper Street and under the train line will only increase in popularity encouraging greater movement of pedestrians along Columbia Lane. The future-proofing of this development must be considered, including the potential effects of the decommissioning of the electricity substation.

AFFORDABLE HOUSING

Council notes that the Planning Team Report (dated 22 May 2017) clearly defines that a 5% contribution of the development is to be affordable housing, not 5% of the uplift. This is to be

adhered to and the affordable housing units are to include a range of unit types and are to be managed by Council in perpetuity.

WASTE

The bin collection area is to be at grade, undercover and located as far as possible from Powells Creek to reduce the risk of overflow litter entering the stormwater system. Previous landscaping advice for buffer planting should be applied in all areas adjoining Powell's Creek. Council determines that bin areas must be wholly enclosed and covered to protect from weather, odour and disease vectors (such as rodents, insects and pests). Bin storage areas must be out of sight from adjacent dwelling units, surrounding buildings and the street.

Bin areas must include an appropriately sized communal repair hub and bin wash areas, with accessible power and facilities for cleaning and draining bins subject to Sydney Water authorisation.

Revisions to the design and a more detailed demonstration that these requirements are achieved is necessary.

The domestic waste bin holding area is to have the capacity to accommodate 146 x 660L MGBs and sufficient room to access and manoeuvre MGBs. A bin wash down area is to be provided within this area. Development design must include measures to minimise noise associated with the use and servicing of the waste management facilities, chutes and compactors. Council finds there to be no specific recommendations regarding this on the Acoustic Plans.

TRAFFIC AND PARKING

The proposed on-site car parking provision results a surplus of 77 spaces. It is Council's position that a reduction in basement level parking will provide improved ground level amenity and public domain interfaces. A reduction in on-site parking provision will minimise impact on the existing road network and improve landscaping outcomes by providing additional deep soil zones.

The application does not provide an up-to-date analysis of intersection performance. Council requires an updated SIDRA analysis be submitted which:

- i. Is based on the latest traffic survey results;
- ii. Incorporates all approved and committed developments to confirm and re-consider the scale and access arrangement as this may have changed since 2015;
- iii. Ensures all intersection LoS is D or above;
- iv. Includes the Parramatta Road and Columbia Lane intersection;
- v. Uses SIDRA network modelling as required or otherwise provide justification;
- vi. Provide details of the SIDRA analysis, in particular queuing analysis, SCATS data, and signal setting.

The basement layout does not satisfy the minimum queuing requirements and accessible parking requirements. Council considers a turnaround porch area should be included prior to the control point.

Other loading/unloading activities associated with future tenants and retails must be accommodated in the basement, as should wash bays for the buildings occupants. The development appears to rely on movement at ground level, conflicting with the pedestrianised environment envisaged at ground level. Any design changes to the loading and unloading activities must be supported by justification detailing loading bay dimensions and numbers.

Car share providers on the market must be consulted in order to ensure a viable car share scheme. It is inadequate to suggest the integration of such providers without determinative detail. Any reliance on car share schemes need to consider public access requirements.

The waste collection point is inadequate and requires redesign to demonstrate compliance with the following:

- i. Along-side the driveway into the site;
- ii. 10m rear loader accessible – turning circle 18m kerb to kerb;
- iii. Length of standing area 10m;
- iv. 3.6m height clearance;
- v. Gradient of ramps maximum 1:5.

HERITAGE

Council considers the preparation of a Heritage Impact Statement to identify additional opportunities for interpretation of heritage items in the vicinity of the site an important mechanism to direct future development on the subject and surrounding sites. The inclusion of an awning along Nipper Street, combined with increased setbacks and a stronger pedestrian wayfinding network that links the site to surrounding heritage items enhances the credibility of the development within its broader context.

BASIX

As previously raised, the proposal is to achieve the BASIX targets detailed by the PRCUTS (Energy Target: BASIX Energy 40 and Water Target: BASIX Water 60). The development should be a reflection of best practice and reflect the spirit of the PRCUTS. It is not accepted that these targets are not required by the SEPP, given the premise for the additional development potential facilitated through the rezoning was PRCUTS, which includes specific benchmarks for sustainable, high quality developments.

ASSESSMENT FRAMEWORK

The application and supporting documentation does not demonstrate how the development is consistent with the PRCUTS - Planning and Design Guidelines. Future amendments should not only provide rigorous consideration of PRCUTS but also:

- Strathfield Council's DCP (Part Q Urban Design and No. 20 Parramatta Road Corridor,
- Part C – Multiple-Unit Housing of the Strathfield Development Control Plan 2005,
- Part H – 'Waste Management' Strathfield Consolidated Development Control Plan 2005,
- Part I – 'Provision of Off Street Parking Facilities' Strathfield Consolidated Development Control Plan 2005;
- Part N – 'Water Sensitive Urban Design' (WSUD) Strathfield Consolidated Development Control Plan 2005).

Council is of the opinion that the Development Application is inconsistent with the spirit of the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS). The strategy establishes the need for high levels of amenity through design excellence in order to accommodate the residential densities the subject site has been rezoned to support. It is clear the application as submitted is one which is out of sequence.

The Application proposes a marginally compliant design against the design criteria of the Apartment Design Guideline (ADG) and is inconsistent with much of the design guidance where variations are sought. Revisions to the design have not addressed design flaws raised by Council or the Design Review Panel. A number of these issues reflect inconsistencies with the intent of PRCUTS, the PRCUTS Planning and Design Guidelines, as well as various sections of Council's DCP 2005.

For this reason, Council requests that you advise within **seven days** from the date of this letter your intention to provide Council with significant amendments to the proposal addressing all outstanding matters of concern or whether Council should proceed with the assessment based on the current design. Should a response not be received, Council will proceed with the application as recommended by the Sydney Eastern Planning Panel.

Please address your response to the undersigned.

Kind Regards,

Joe Gillies
Senior Planner