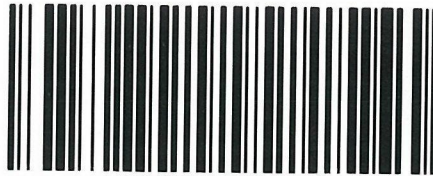




INNER WEST COUNCIL

OUR REF: P5150.430-03

YOUR REF: 16/08053



PCU066034

Department of Planning and Environment
Attention: Martin Cooper, Acting Team Leader
Sydney Region East
GPO Box 39
SYDNEY NSW 2001

Department of Planning
Received
6 JUL 2016
Scanning Room

Dear Sir,

SITE COMPATIBILITY CERTIFICATE FOR 2B WEST STREET, LEWISHAM.

I refer to your letter received by Council on 10 June 2016, regarding the abovementioned site. The following comments are provided by Council officers in respect to the Site Compatibility Certificate (SCC) being considered by the Department of Planning and Environment under SEPP (Housing for Seniors or People with a Disability) for 2B West Street, Lewisham (*the site*).

Urban Design and Planning

The site is zoned SP2 Community Facilities under the provisions of Marrickville Local Environmental Plan 2011; is located within a heritage item (I63); and has no height of building (HOB) or floor space ratio (FSR) development standards. The SP2 zoned sites does not have FSR and HOB controls due to the large property area and generally restricted and multifunctional uses of the broader Catholic Church owned precinct, making setting controls impractical. The establishment of appropriate density and building height within parts of the precinct requires site specific assessment.

The proposed land use for some higher density seniors' housing is appropriate, using underutilised space co-located with other community facilities within the Catholic Church owned precinct, in a generally isolated location away from direct dwelling interface conflict, as well as being located near transport, local services and facilities. It is noted, however, that neither Lewisham nor Petersham are accessible stations.

The isolated nature of the site from directly adjacent sensitive use, and railway and road corridor buffer to the south makes the site appropriate for some height, without causing impacts. The proposal only shows shadow diagrams at 9 am, 12 midday and 3 pm. Hourly diagrams and detail survey information would be required to assess the full solar impact to residential to the south, primarily on Railway Terrace, however from the diagrams submitted the shadows fall primarily on the railway and roadway land, but does extend into residential areas, especially in the earlier and later parts of the day. This may cause an issue where dwellings depend on winter solar access at these times of the day.

Customer Service Centres

Petersham | P (02) 9335 2222 | E council@marrickville.nsw.gov.au | 2-14 Fisher Street, Petersham NSW 2049

Leichhardt | P (02) 9367 9222 | E leichhardt@lmc.nsw.gov.au | 7-15 Wetherill Street, Leichhardt NSW 2040

Ashfield | P (02) 9716 1800 | E info@ashfield.nsw.gov.au | 260 Liverpool Road, Ashfield NSW 2131

Reasonable certainty around this matter (connected to the height; density; and envelope that can be allowed) needs to be established prior to issuing of any SCC.

Even if the site is able to achieve technical solar compliance from the substantial height, the 14 storey scale and bulk of the two tower buildings located on the top of the ridge will be highly visible and dominating of the immediate as well as wider local landscape. The scale is completely out of character with the scale of the immediate and wider local landscape. The planning report compares the proposal with the McGill Street (Lewisham West) Precinct, and nearby Taverners Hill Precinct under draft Parramatta Road Urban transformation Strategy, making the argument that *"the development of seniors housing on the site is considered to be compatible with existing and approved uses of land in Lewisham..."*. The Lewisham West precinct is a strategic isolated area that was planned specifically for development; is maximum 11 storeys (not 14); the height is located around the central light rail corridor with 5/6 storeys at the Old Canterbury Road interface opposite dwellings; and the site is located in a low lying area reducing its wider dominance of the scale in the local landscape. In terms of the draft Parramatta Road Urban transformation Strategy, the former LGAs making up the Inner West Council, have all raised objections to the scale of the proposal. It is uncertain at this stage what the final heights and densities will be, but will most likely be reduced from that proposed under the draft.

The 4/6 storey height of Building 3 and the 5 storey podium height responds to the streetscape scale and scale of the retained Novitiate Building and would not present significant concern. However, the scale of the tower elements, especially Building 2 directly adjacent to West Street in terms of direct streetscape incompatibility, combined with the scale of Building 1 in the broader landscape is not supported and should be substantially reduced.

Opportunities should be explored to ensure the development of the site results in broader public domain and other community benefits such as:

- provision of publicly accessible (public easement) through-site-links through the middle of the precinct: east-west from West Street to Thomas Street i.e. along the north edge of the site via lane adjacent to the Anne Walsh and North Garden; and north-south along Charles O'Neil Way;
- enhancement of the adjoining walking cycle path to the south of the site between West Street and Thomas Street;
- public access to open space;
- community facilities; and
- affordable housing.

Heritage

Alterations:

The proposal is not fully developed, but to the extent that detail is provided, it appears that the partial demolitions of the Novitiate Building will remove accretions and could enhance its significance. It is also proposed to demolish an early addition to the Ann Walsh Building to enable the driveway to be widened. This is more problematic, but the classical additions do affect the integrity of the Arts and Crafts Federation design. Both buildings will require internal alterations. On balance, proposals for both buildings could

be supported, subject to a satisfactory heritage management document (CMP or Schedule of Works plus clear drawings and ongoing supervision by a conservation architect).

Relationship of new buildings:

The Novitiate, is the listed item most affected. It is a large, striking building, strongly defined by its simple but distinctive detailing and in particular because it comprises virtually one material - dark face brick.

There is no objection to the demolition of the low scale aged care buildings. These replaced a sexton's cottage, small dormitory and a boiler house, all probably also low in scale compared to the Novitiate. The proposed new buildings, whatever their design may be, will be much higher, altering its setting, and the historic scale of the setting. But the tallest elements are reasonably distant from the Novitiate. Building 3 and the podium are of comparable height to the Novitiate. The approach is similar to that taken with the modern infill between two listed buildings on the hospital site, further along West Street.

The success or failure of the visual relationship with the Novitiate will depend on the design of the new buildings. As noted in the SoHI, there are few design cues in the heritage buildings, possibly something less striking and with smaller scale elements than illustrated would be more appropriate.

Development of designs for new buildings and proposals for altering and adaptively reusing listed buildings for purposes of any DA should be guided by a conservation architect. The DA should be accompanied by heritage management documents to be specified by Council, and the work should be supervised by a conservation architect.

Archaeology:

The site was within Aboriginal lands before 1788. It was later a graveyard, which was cleared before the previous buildings were constructed. The SoHI relies on an earlier specialist archaeological report which concludes that the site's archaeological potential is low. This is a reasonable conclusion, and the provisions of the Heritage Act would apply if any deposits were encountered.

Traffic and Parking

The preliminary Site Transport Assessment is an inadequate basis and justification for the proposed vehicle access arrangements. The proposed southernmost driveway off West Street is located on a blind sweeping bend, proximate a T-intersection with Brighton Street, and in a street characterised by significant queuing traffic due high traffic volumes and traffic light conditions at Railway Terrace to the south and Parramatta Road to the north. This driveway location is suitable for left in turn only for vehicles approaching from the south and should not be used for exiting vehicles in any circumstances.

In relation to traffic and parking, Council considers that any further significant intensification of uses on the broader St Vincent de Paul campus such as that proposed under the SCC, requires analysis of the **cumulative** impact of all co-located uses. Observation of current conditions in that section of West Street adjacent to the site indicates reliance on street parking for existing staff associated with the campus, and that now appears to be at capacity. In addition, more analysis needs to be undertaken in

relation to the actual demand for staff, resident and visitor parking, loading facilities and bus drop off and pick up based on data from existing examples of contemporary aged care facilities. Newer aged care facilities that include independent living units cater for a population that is not necessarily infirm, and therefore car ownership needs to be considered.

Vegetation and Biodiversity

Overall the Preliminary Arboricultural Report is satisfactory, however there is currently no clear information on what trees are actually being removed, the tree report makes recommendations on removals and retention values but the landscape plan does not appear to reflect these recommendations or show any detail on what trees are being removed or replaced.

Council will require more information to accompany any DA in the form of a *Tree Impact Assessment Report* and *Tree Protection Plan* (refer Marrickville Development Control Plan Section 2.20 Tree Management).

The applicant should provide more information on tree replacement and landscaping, which will need to include:

- proposed species;
- quantities;
- container sizes;
- details of proposed soil volumes; and
- an assessment of expected canopy cover after 10 years.

The site is located within a Bandicoot Protection Area and Wildlife Corridor and any DA must also comply with the provisions of Marrickville Development Control Plan Section 2.13 Biodiversity.

Given the scale of the proposal and complex site constraints, Council encourages the applicant to seek formal PreDA advice from Council prior to finalising the detailed design for the site.

Thank you for the opportunity to respond the application for a Site Compatibility Certificate at 2B West Street, Lewisham. Please contact the undersigned on 9335 2251 should you wish to discuss this letter further.

Yours faithfully,



Judy Clark,
Manager Development Assessment, Marrickville