

28 Carrington Street

SUMMER HILL 2130

6th April 2013

Director, Metropolitan & Regional Projects South

Department of Planning and Infrastructure

GPO Box 39

SYDNEY NSW 2001

ATTN: Helen Mulcahy

Dear Ms Mulcahy

RE: Sec75W Modification Application to MP08 0195 – 78-90 Old Canterbury Rd, Lewisham

I refer to the above Modification Application to the approved Concept Plan for the mixed development of this site and note that DA2012/00588 to carry out the development in five stages is with Marrickville Council (and presently on public exhibition).

I have previously made submissions to the Department on the Concept Plan (29/2/10) and the Preferred Project Plan (11/9/2011) as well as addressing the Planning Assessment Commission (PAC) at its public meeting on the 28th February 2012. I am a resident of the immediate locality and have qualifications and experience in town planning, urban studies and heritage conservation.

The development application submitted to Marrickville Council describes and depicts the development as though the modifications requested to the PAC-approved concept plan have already been agreed to. My examination of the DA architectural plans, perspectives and documentation reinforces in my mind the necessity for critical Concept Plan Approval conditions within Schedule 3 (conditions 1, 2, 11,14,15,17and 18) to prevail; the modifications requested should be refused.

BUILT FORM

Specifically, the submitted DA is the opposite of the intention of Conditions 1 and 2. The Statement of Environmental Effects (SEE) refers to the SEPP65 Report submitted as meeting the requirements of these conditions along with condition 4. The certifying architect for the SEPP65 Design Verification Statement is Tony Owens himself, the architect throughout the development of the concept plan from its 12/14 storey genesis and now continuing as the project architect for Meriton for the DA.

The inference to be drawn from various sections of Mr Owen's SEPP65 Report quoted in the SEE (viz: 'The proposed development incorporates variations in colours and materials that assist with articulation'(p51); '..7 quite different buildings each with unique plan layouts and envelopes' ...'We sought to design an ensemble of buildings with a common language that runs through the composition'(p54)) along with the architectural elevations and perspectives plus the palette of finish colours and external materials, is that **Mr Owens feels that his compliance with PAC conditions in Schedule 2 (A5, B1a-c, B3) is sufficient in itself to achieve a development of design excellence** (Condition 1) **and of a high standard of design** with 'a high level of modulation/articulation of

the building and range of high quality materials and finishes' (Condition 2). This is clearly not the case as what he has proposed has a design uniformity and appearance which is overpowering across 7 sizeable buildings and represents a poor built form result. The DG's Design Excellence Guidelines envisage a process (and outcome) which would be entirely different. I doubt whether a peer review of Mr Owen's work would support his approach.

THE VEHICULAR ACCESS RAMP

While the deletion of the access ramp from between Buildings B and D is supported, its relocation as a long dive ramp directly alongside Buildings A and B (with amenity impacts for ground floor occupants, pedestrians accessing the light rail and those using the adjacent landscaped areas and the Greenway) is a poor design solution. A 2metre wide path for such a length bordered by building and ramp walls would be unpleasant and unsafe and not in accordance with CEPTED Principles.

The ramp should be under a building, not adjacent to one. There is no evidence that an effective and efficient basement carpark could not be achieved, as the site is not constrained – indeed, the submitted DA shows sections of buildings are proposed above natural ground level.

PUBLIC OPEN SPACE

The Modification Application seeks to decrease the amount of public open space, to comprise no more than the central open space north of Hudson Street (Condition B3) and then at the minimum 3000m² specified. Condition B2 which removes the loading area but requires landscaping and public access appears to have been ignored in the calculations. Other areas of public open space (should they exist!!) remain undefined in the DA with Council – at best there is vague depictions on the site plan of open space generally so that it is impossible to determine what is likely courtyards (private), useable public spaces or through site links. The PAC was critical of the concept plan on this very issue (Comment 5 of PAC 15/3/12 findings). The submitted DA has no landscape plan and the SEE is also silent on this issue, aside from referring (at p26) to an arborist report which covers the removal of existing trees during site preparation.

If there have been '...substantial(ly) increases (in) the amount of space available for open space and landscaping' (p5 Modification Application), this should be CLEARLY depicted as part of a landscape plan prepared by a qualified practitioner which shows private areas, publicly accessible areas (of size and in positions likely to be used) and public/private walkways and 'through site links'. The provision of such a plan is standard practice and the necessary base document against which to assess compliance with PAC findings and conditions.

FOOTPATH WIDTHS

The existing public footpaths for William Street and what will remain as Brown Street are inadequate in width. With the increased footpath use the development will generate plus adequate area for footpath tree plantings, Condition 18(a) should remain unaltered.

CAR SHARE SCHEME

Condition 17 of the PAC concept plan approval requires future DAs to '...require the provision and implementation of a car share scheme'. The current DA before Marrickville Council makes **no** such provision. Indeed, the SEE submitted notes - 'A car share scheme is not proposed given the proximity to public transport...and the desire to reduce traffic generated by the site.' (p16) This is perverse given that PAC condition 8 sets a rate of parking provision which the PAC considered appropriate given the very availability/proximity of public transport (current and future) and the constraints on the adjacent road system. Car share schemes for this site and the adjoining

Allied Mills site (where it is also a PAC condition) are essential.

The Modification Application does NOT include a request to delete Condition 17 so I assume that condition will remain and Council will be requiring a car share scheme as a condition of any DA approval(s) it grants.

Yours Sincerely

David Rollinson

CC: Marrickville Council re DA 2012/00588