

27 November 2013

Jane Flanagan
Planner
Department of Planning and Infrastructure
PO Box 33
SYDNEY NSW 2001

Dear Jane,

**Proposed Dwelling Sizes - 114 Herring Road, North Ryde
Concept Plan (MP10_0112) (MOD2) &
Stage 1 Project Approval (MP_0113) (MOD 1)**

We are writing to provide demographic and market analysis in support of the apartment sizes proposed in the above modification applications.

SEPP 65

The following clause was added to SEPP 65 in 2008, in response to housing affordability concerns:

30A Standards that cannot be used as grounds to refuse development consent for residential flat buildings

(1) *A consent authority must not refuse consent to a development application for the carrying out of residential flat development on any of the following grounds:*

(b) *apartment area: if the proposed area for each apartment is equal to, or greater than, the recommended internal area and external area for the relevant apartment type set out in Part 3 of the Residential Flat Design Code.*

Residential Flat Design Code (RFDC)

The RFDC was published over a decade ago (2002) during a residential property boom. Part 3.0 of the RFDC relevantly states:

“Apartment Layout

Apartment Type	Area	m ²
03.01 Studio	Internal Area	38.5m ²
	External Area	6m ²
03.02 One bedroom, cross through	Internal Area	50m ²
	External Area	8m ²
03.03 One bedroom masionette/loft	Internal Area	62m ²
	External Area	9.4m ²
03.04 One bedroom single aspect	Internal Area	63.4m ²
	External Area	10m ²
03.05 Two bedroom corner	Internal Area	80m ²
	External Area	11m ²
03.06 Two bedroom cross through	Internal Area	89m ²
	External Area	21m ²
03.07 Two bedroom cross-over	Internal Area	90m ²
	External Area	16m ²
03.08 Two bedroom corner with study	Internal Area	121m ²
	External Area	33m ²
03.09 Three bedroom	Internal Area	124m ²
	External Area	24m ²

This table and the accompanying illustrations provide information on a variety of unit types. Dimensions, areas and furniture layouts are included. These examples are a comparative tool for recognising well-organised, functional, and high quality apartment layouts.]

Rules of Thumb

If council chooses to standardise apartment sizes, a range of sizes that do not exclude affordable housing should be used. As a guide, the Affordable Housing Service suggest the following minimum apartment sizes, which can contribute to housing affordability: (apartment size is only one factor influencing affordability)

- 1 bedroom apartment 50m²
- 2 bedroom apartment 70m²
- 3 bedroom apartment 95m²

Apartment Mix

A mix of apartment types provides housing choice and supports equitable housing access. By accommodating a range of household types, a mix of apartments can ensure apartment buildings support the needs of society now and in the future. This is particularly important because apartment buildings form a significant and often permanent part of the urban fabric.

Objectives

- To provide a diversity of apartments types, which cater for different household requirements now and in the future.
- To maintain equitable access to new housing by cultural and socio-economic groups.

Better Design Practice

- Provide a variety of apartment types between studio-, one-, two-, three- and three plus-bedroom apartments, particularly in large apartment buildings. Variety may not be possible in smaller buildings, for example, up to six units.
- Refine the appropriate apartment mix for a location by:
 - considering population trends in the future as well as present market demands
 - noting the apartment's location in relation to public transport, public facilities, employment areas, schools and universities and retail centres.

(our emphasis)

As detailed below, it is particularly necessary to 'refine the appropriate apartment mix' as this specific location:

- Has a demographic profile that is atypical of broader Sydney.
- Is located in the immediate vicinity major public transport, retail, employment and education facilities, including Macquarie University, Macquarie University Railway Station and Macquarie Regional Shopping Centre all within a 400 metre walking distance.

Proposed Apartment Sizes and Mix

The Concept Plan was originally prepared in early/mid 2011, prior to the availability of the 2011 census data, or any sales data for contemporary apartments within the locality. Apartment sizes and mix were therefore based upon assumptions drawn from typical demand in comparable circumstances, including the above guidance from the RFDDC.

However, since this time housing demand has shifted, 2011 census data has become available, and sales data has been obtained from recently completed projects in the immediate vicinity of the site, including 'Macquarie Central' at 110 Herring Road and Meriton's project at 88 Talavera Road. In view of this extensive new information, which is considered in detail under separate heading below, the above application was lodged to revise the approved dwelling sizes and mix as detailed at Tables 1 to 3.

TABLE 1 – APARTMENT NUMBERS

BUILDING	STAGE 1 PROJECT APPROVAL MP10_0113	PROPOSED MODIFICATION TO MP10_0113
H (Adelaide)	54	74
W (Perth)	82	78
C (Brisbane)	111	127
Y (Darwin)	44	61
TOTAL	291	340

TABLE 2 – DWELLING MIX

APARTMENT TYPE	STAGE 1 PROJECT APPROVAL MP10_0113	PROPOSED MODIFICATION TO MP10_0113
1 BED	142 (49%)	169 (49.7%)
2 BED	123 (42%)	171 (50.3%)
3 BED	26 (9%)	0
TOTAL	291	340

TABLE 3 – DWELLING SIZES

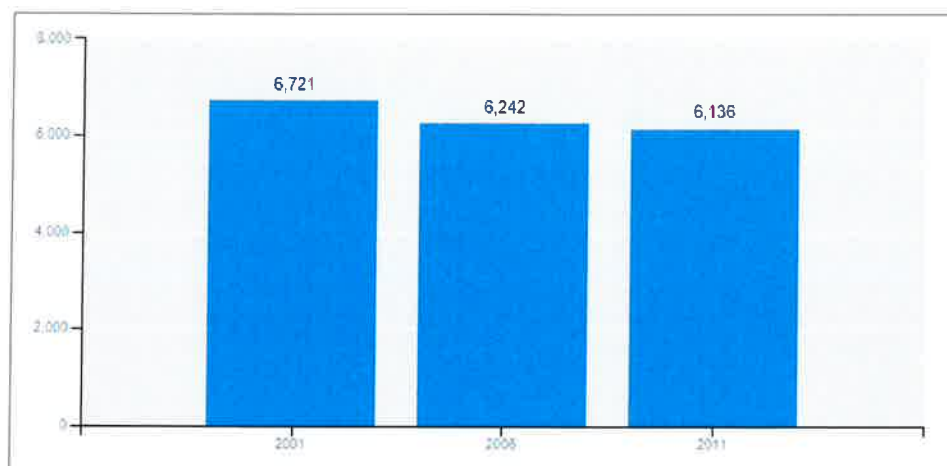
APARTMENT TYPE	PREFERRED PROJECT REPORT MP10_0113	PROPOSED MODIFICATION MP10_0113
1 BED	50m ² – 68m ²	50m ² – 60m ²
2 BED	78m ² – 107m ²	60m ² – 90m ²
3 BED	107m ² – 138m ²	NA

While the smallest apartments in each type are less than suggested by the Affordable Housing Service in the RFDC, the average 55m² 1 bed size exceeds the 50m² minimum, and the average 76m² 2 -bed size exceeds the 70m² minimum. Therefore, while the project includes a range of smaller 2 bed apartment types to accommodate the atypical demographic profile of the locality, these smaller apartments are offset by larger apartments, such that the average size of each apartment type exceeds the RFDC recommended minimum.

Demographic Analysis of Macquarie Park,

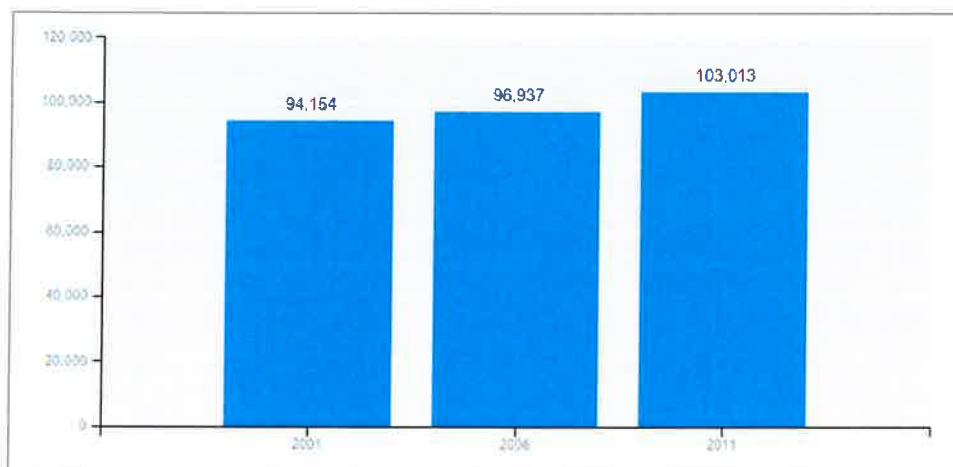
The following analysis has been compiled by Urbis using Census of Population and Housing 2011 data for Macquarie Park, the Ryde LGA and Greater Sydney.

Table 4 –Population of Macquarie Park



Source : ABS Census of Population and Housing 2001, 2006 and 2011; Urbis

Table 5 – POPULATION OF RYDE LGA

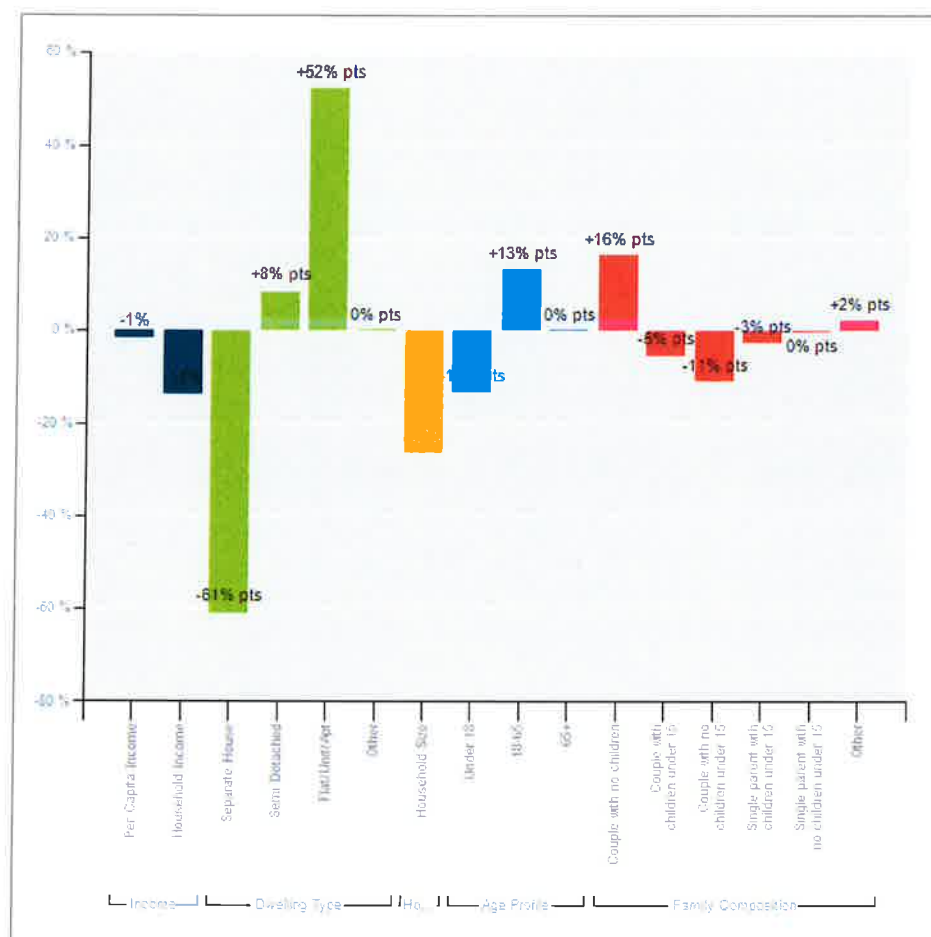


Source : ABS Census of Population and Housing 2001, 2006 and 2011; Urbis

Comment:

The population of Macquarie Park declined by 8.7% between 2001 and 2011. This contrasts with an 8.6% increase in the population of the Ryde LGA over the same period. As there was no major demolition of housing stock, the decline in population in Macquarie Park is presumed to have occurred through declining household sizes.

Table 6 – DEMOGRAPHIC VARIATION BETWEEN MACQUARIE PARK AND GREATER SYDNEY



Source: ABS Census of Population and Housing 2011, Urbis

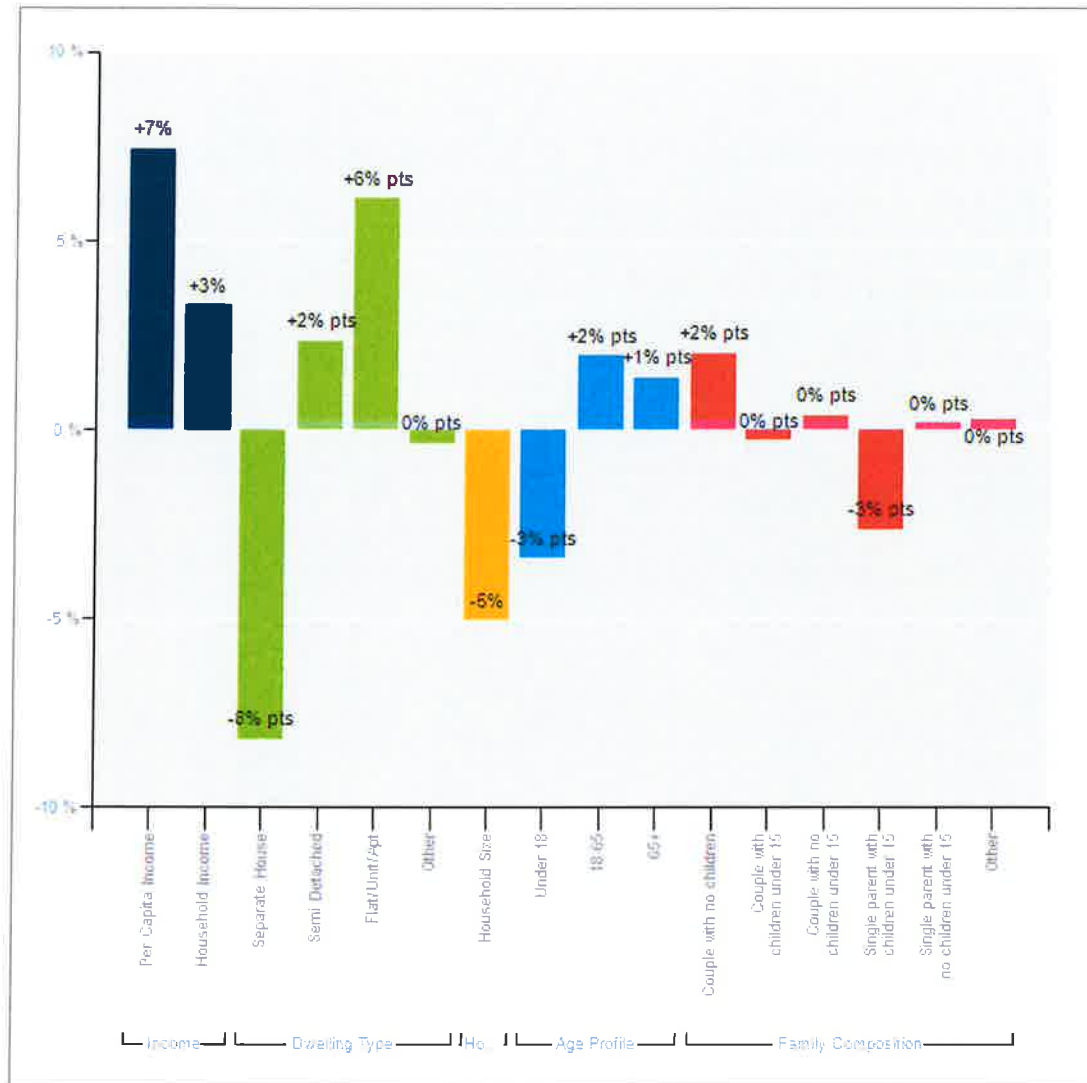
Comment:

The three most notable demographic characteristics of Macquarie Park relative to Greater Sydney are:

1. 61% Less 'separate houses'.
2. 52% more 'flats/units/apartments'
3. 26% smaller household size

It is also notable that in Macquarie Park there are relatively few children (-13%) and relatively more working age adults (+13%) and couples without children (+16%).

Table 7 – KEY DEMOGRAPHICS VARIATION BETWEEN RYDE LGA AND GREATER SYDNEY

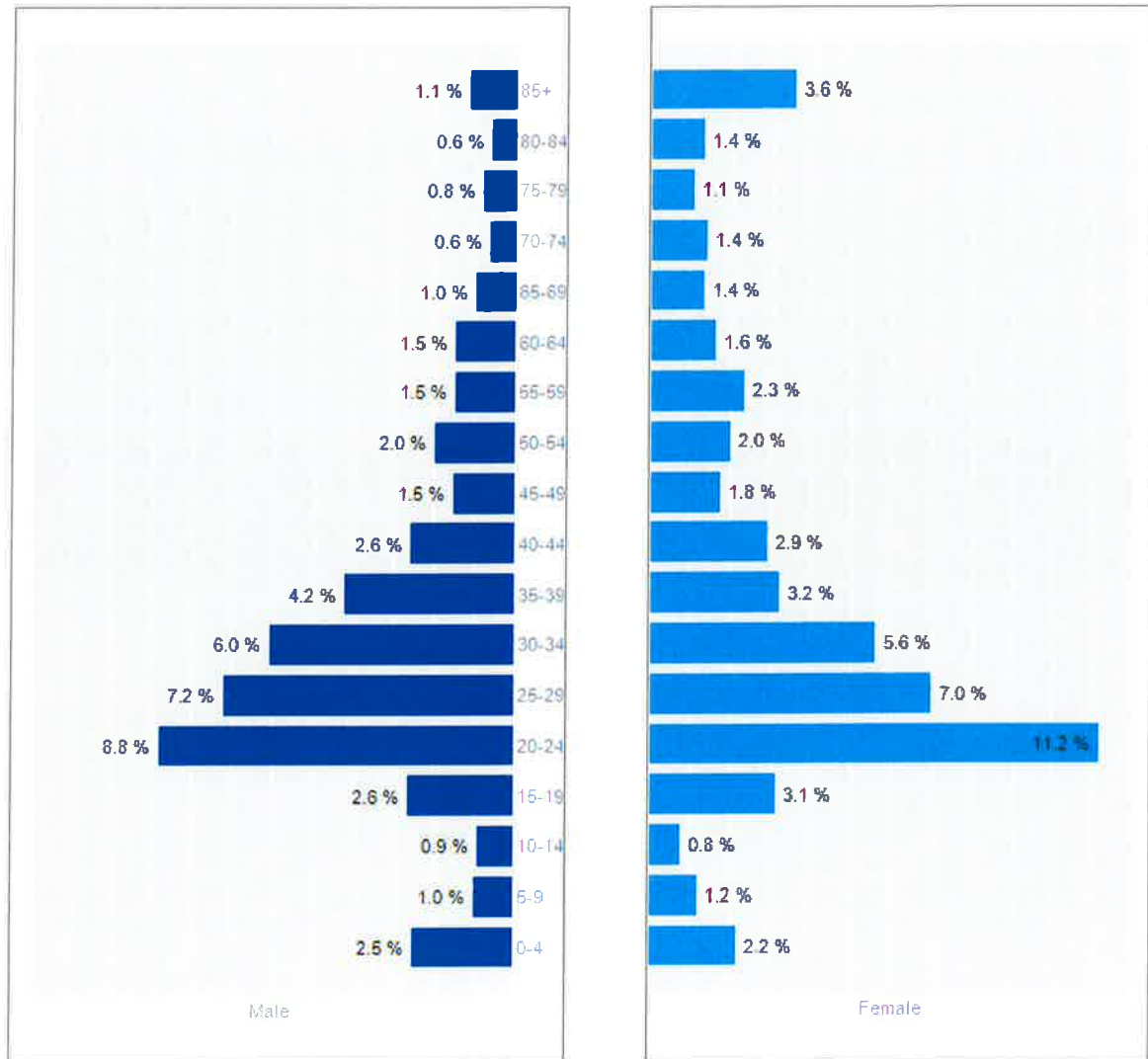


Source : ABS Census of Population and Housing 2011; Urbis

Comment:

While the Ryde LGA as a whole also has a greater proportion of apartments than houses, and smaller overall household sizes, the bias towards smaller apartments is far greater in Macquarie Park.

Table 8 – GENDER DISTRIBUTION BY AGE IN MACQUARIE PARK

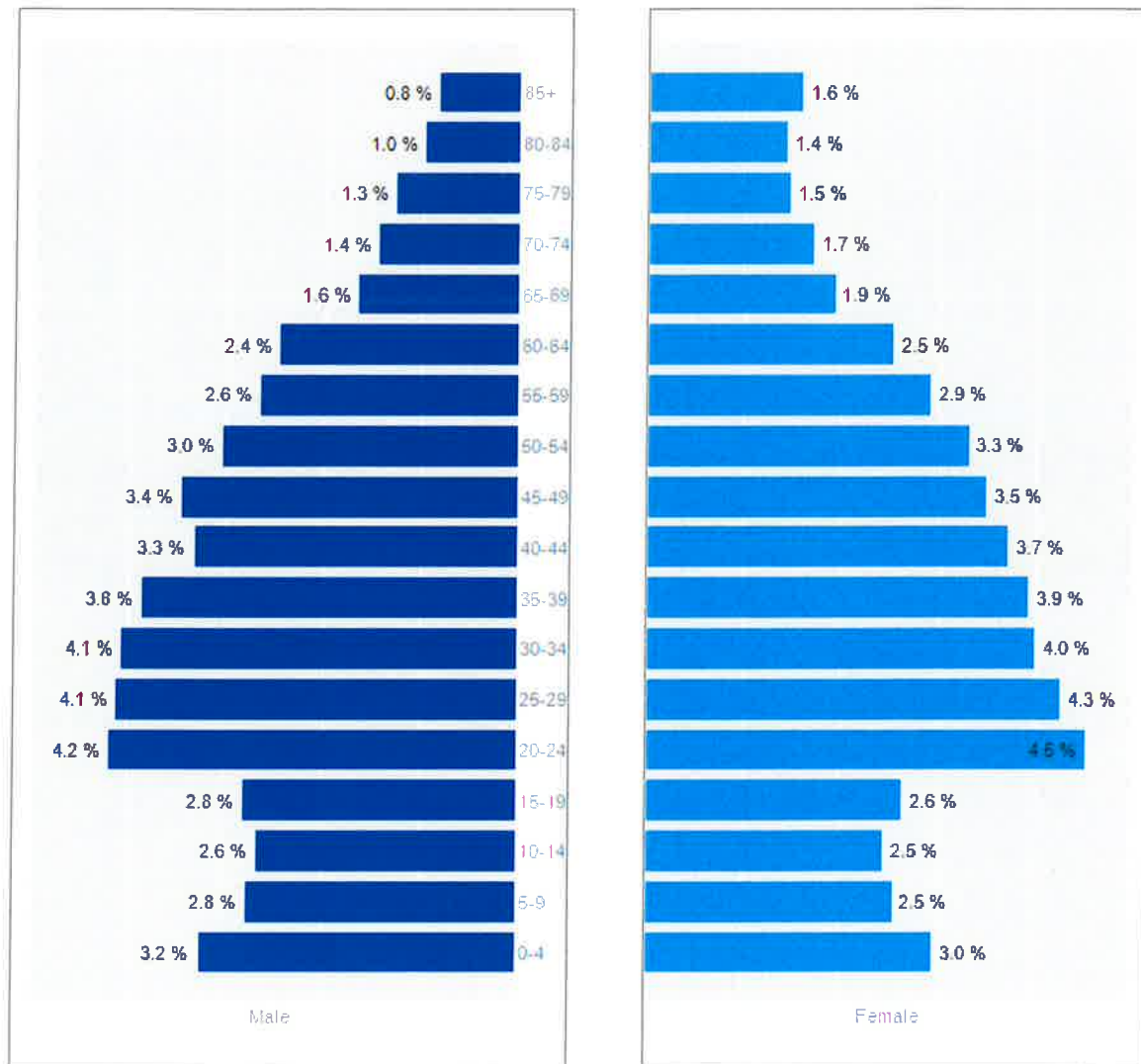


Source : ABS Census of Population and Housing 2011; Urbis

Comment:

The population of Macquarie Park is significantly skewed towards 20 to 34 year olds.

Table 9 – GENDER DISTRIBUTION BY AGE IN RYDE LGA

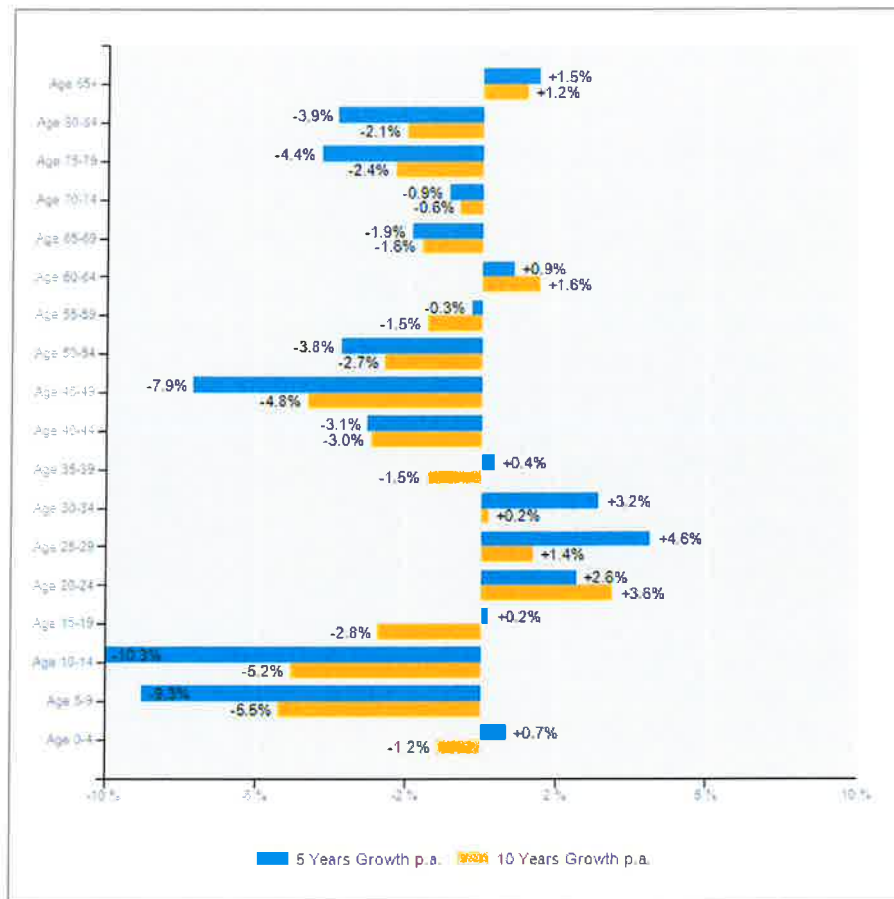


Source : ABS Census of Population and Housing 2011; Urbis

Comment:

The population of the Ryde LGA is for more evenly distributed than that of Macquarie Park.

Table 10 – POPULATION GROWTH P.A. BY AGE IN MACQUARIE PARK, 2001-2011



Source : ABS Census of Population and Housing 2001, 2006 and 2011; Urbis

Comment:

Over the 5 years to 2011 the proportion of 20-34 year olds in Macquarie Park continued to increase, while the proportion of under 20 year olds and over 50 year olds continued to decline.

Demographic Summary

Macquarie Park already has a significantly greater proportion of apartments than detached houses. Notwithstanding this, the population declined between 2005 and 2011, reflecting a decreasing household size that at 2011 was 26% smaller than the Sydney average.

The predominance of young adults without children is pronounced and increasing, and the proportion of children and people over 50 continues to decline. This is consistent with what may be expected in a locality that accommodates a major university and a significant supply of white collar employment.

These demographics demonstrate a significant need for future housing stock that is smaller than the Sydney average in terms of both floor space and number of bedrooms if it is to meet the existing demographic profile and continuing trends within the locality.

Market Analysis

We are concerned by suggestions in Council's recent submission that consideration of market demand is merely a 'marketing strategy', rather than a valid planning consideration. It is troubling that Council cannot appreciate the need to deliver housing supply that is responsive to actual community needs, rather than arbitrary planning assumptions or prejudices.

When the original Concept Plan was designed and submitted, there was little comparable recent sales data available. However, since that time the Meriton project at 88 Talavera Road (Macquarie Residences) and the Toga project at 110 Herring Road (Macquarie Central), have been taken to market, as has Stage 1 of the subject Concept Plan. Buyer interest and realised sales prices provide the most objective guide as to the relative demand for various apartment types and sizes.

In all three projects there was a very clear preference for '1 + study' and small 2 bedroom apartments. Lowest demand was for the larger two bedroom apartments, which in the case of the Stage 1 of the subject Concept Plan were the only apartments for which deposits were not paid on the recent first day of sales. These three apartments were 96m², with good orientation (living rooms facing north west), good outlook over the pool, corner position, cross ventilated, including a study with windows, two balconies, two bathrooms and an ensuite.

The very clearly expressed market preferences are validated through the following sales data for nearby projects, in which the highest sales price per square metre is highlighted green, and the lowest highlighted red.

TABLE 11 – SALES DATA FOR MACQUARIE CENTRAL

Macquarie Central Stage 1 Buildings A & B								
Type	Net Internal	Ave Internal	Cars	Price Range	Average Price	Average \$/m ²	Mix No	Mix %
Studios	40m ²	40m ²	0	\$360k to \$390k	\$375k	\$9,375	7	3
1 Bed	50 to 58m ²	55m ²	1	\$450k to \$540k	\$490k	\$8,909	113	46
1 Bed + Study	55 to 62m ²	58m ²	1	\$495k to \$560k	\$530k	\$9,137	34	15
2 bed (small)	71 to 74m ²	73m ²	1	\$620k to \$700k	\$660k	\$9,041	74	30
2 bed (large)	80 to 92m ²	86m ²	1	\$630k to \$800k	\$715k	\$8,313	8	3
3 bedroom + study	125 to 133m ²	129m ²	2	\$925k to \$1,100k	\$1,000k	\$7,751	8	3

Macquarie Central Stage 2 Building C & D								
Type	Net Internal	Ave Internal	Cars	Price Range	Average Price	Average \$/m ²	Mix No	Mix %
1 bedroom	50 to 54m ²	52m ²	1	\$430k to \$540k	\$500k	\$9,615	70	31
1 bed + study	60m ²	60m ²	1	\$525k to \$580k	\$550k	\$9,166	117	51
2 bedroom	78 to 83m ²	80m ²	1	\$630k to \$750k	\$690k	\$8,625	42	18

Macquarie Central Stage 3 Building E								
Type	Net Internal	Ave Internal	Cars	Price Range	Average Price	Average \$/m ²	Mix No	Mix %
1 bedroom	50 to 59m ²	55m ²	1	\$475k to \$563k	\$515k	\$9,363	36	25
1 bed + study	57 to 61m ²	59m ²	1	\$535k to \$599k	\$565k	\$9,576	59	41
2 bedroom (small)	68m ²	68m ²	1	\$599k to \$765k	\$625k	\$9,191	46	32
2 bedroom large	73 to 80m ²	77m ²	1	\$640k to \$765k	\$690k	\$8,961		
3 bedroom	110 to 125m ²	117m ²	2	\$1,055k to \$1,160k	\$1,100k	\$9,401	3	2

TABLE 12 – SALES DATA FOR MACQUARIE RESIDENCES

Macquarie Residences Buildings C & B				
TYPE	Number	Average Area	Average \$	Average \$ psm
Studio	13	44.15	\$458,972	\$10,395
1 Bed	58	53.47	\$543,339	\$10,162
1 + Study	19	55.84	\$615,292	\$11,018
2 Bed	11	78.45	\$742,915	\$9,469
2 Bed Large (+95m ²)	6	98.67	\$789,087	\$7,998
3 Bed	0			
TOTAL	107	57.86	\$587,278	\$10,150

While we accept that realised sale prices are not a planning consideration of themselves, to the extent that they indicate relative demand for different housing product, they are the only accurate indicator. In this regard, the price per square metre realised for all three relevant projects confirm a very strong demand for 1 + study apartments, which is entirely consistent with what would be expected from the demographic profile considered above. That is, younger adults without children in the immediate vicinity of a University and a significant supply of white collar employment.

Furthermore, market data clearly confirms relatively low demand for larger two bedroom and three bedroom apartments.

Conclusion

Macquarie Park has a decreasing household size that at 2011 was 26% smaller than the Sydney average. The predominance of young adults without children is pronounced and increasing, and the proportion of children and people over 50 continues to decline. This is consistent with what may be expected in a locality in the immediate vicinity of major public transport, retail, employment and education facilities, including Macquarie University, Macquarie University Railway Station and Macquarie Regional Shopping Centre.

These demographics demonstrate a significant need for future housing stock that is smaller than the Sydney average in terms of both floor space and number of bedrooms. This expectation has been strongly validated by recent sales within the nearby 'Macquarie Central' and the 'Macquarie Residences' projects, in which significantly higher prices per square metre were realised for 1+ study apartments relative to larger 2 bedroom and three bedroom apartments.

While the RFDC suggests minimum apartment sizes of 50 m², 70m² and 95m² for 1, 2 and 3 bedroom apartments respectively, it also acknowledges that these sizes should be refined in direct response to the above demographics. While some apartments are therefore proposed to be smaller than the RFDC recommended minimums, the average sizes of each apartment type are not.

As the original application was submitted prior to the release of the 2011 census and market data from the Macquarie Central and Macquarie Residences projects, the current application merely refines the approved mix in response to this information, as required by the RFDC.

Yours sincerely,



Ian Cady
Associate Director

TABLE 1 – OBJECTIONS RAISED AND RESPONSE

PLANNING CONCERN

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HEIGHT AND SCALE

Noted the objection to the increase in density. (name withheld)

The proposed modifications do not increase FSR, and result in only a minor increase to apartment yield as a result of the conversion of 3 bedroom dwellings to a mix of 1 and 2 bedroom dwellings and will result in an increase of approximately 49 units.

The PAC approved mix of units in Stage 1 resulted in the provision of 466 bedrooms, whilst the proposed mix of units as part of the modification results in a significant decrease with the provision of 340 bedrooms across Stage 1. The overall density is therefore reduced in terms of the provision of bedrooms.

The buildings should be at least 25 metres away from the boundary face and the buildings facing 116-118 Herring Road to be 5 stories high.
(name withheld)

No changes to the building envelopes are proposed as part of the modification.

TRAFFIC AND CARPARKING

The increase in density will add to traffic problems already envisioned by Council and local residents. (name withheld)

Based on the application of the generation rates outlined in the RMS Guide to Traffic Generating Developments Updated Traffic Surveys (Technical Direction 04a) dated August 2013, the revised unit mix will result in an increase of approximately 10veh/hr (or 1 additional movement every 6 minutes) from that previously approved by the Planning and Assessment Commission.

This level of generation is considered negligible and will have no measurable impact on the operation of key intersections in the locality.

The traffic on Herring Road which is already heavily congested will be a nightmare. (name withheld)

As above

If not already in place. "No Parking" restrictions should be implemented

This is a matter for consideration by Council's Traffic Committee; however the

on both sides of Epping Road for a distance of approximately 300 metres on either side of Herring Road intersection to ensure traffic capacity of Epping Road is maintained. (RMS)

A consequence of the increase in unit numbers is an increase in car parking spaces and hence an increase in the number of traffic movements for the site. As raised in Councils earlier submission, all major intersections nearby have reached capacity and the only access to the development site is via a dead end road with a left-in/ left out turning movement to and from a major arterial road close to one of those intersections. A continuation of the argument that the additional traffic is incremental is not satisfactory. Given the proximity to public transport and employment options which underpins the original Concept Plan approval, there is an argument that any increase in unit number should not be accompanied by additional car parking provision. This is encapsulated in the executive summary which seeks to modify Condition C5 of the Concept Plan in a future application. The number of additional spaces should be made clear before the application is determined. (City of Ryde Council)

****The RMS submission notes that the comments provided in letters dated 22 February 2013 and 27 March 2012 are still applicable and are summarised below:**

The RMS has declared a strip of land for road along the Epping Road frontage. (RMS- previous submission)

The proposal must comply with the minimum setback requirements along Epping Road and Herring Road frontages as specified in Section 6.1.4 of

proponent makes no objection to the proposed implementation of No Parking restrictions as proposed by the RMS.

Yield is regulated by FSR and land use controls. While FSR slightly exceeds current controls, it is less than the proposed draft planning controls relating to the site as outlined in the UAP for Macquarie Park. Furthermore the proposed residential use is at the lower end of the scale of traffic generation when compared with range of other permissible land uses. The parking proposed is in accordance with the minimum requirements set out in Council's DCP, and traffic generation is well within the modified capacity of the network.

Appropriate allowance has been provided to the satisfaction of the RMS. Not relevant to the proposed modification.

A 5.0m setback has been provided and this was approved under MP10_0112 Concept Plan. Not relevant to the proposed modification.

PLANNING CONCERN

URBIS

the DCP 2011- Part 4.5 Macquarie Park Corridor. (RMS- previous submission)

To facilitate a reduced traffic impact from the development, the RMS recommends that the commercial parking be provided in accordance with City of Ryde LEP 2011. (RMS- previous submission)

The layout of the proposed car parking areas associated with the subject development should be in accordance with AS 2890.1-2004 and AS 2890.2- 2002. (RMS- previous submission)

All vehicles should enter and leave the site in a forward direction. (RMS- previous submission)

Provision of building maintenance vehicles and removalists need to be provided on-site. (RMS- previous submission)

All demolition and construction vehicles are to be contained wholly within the site before being required to stop. A construction zone will not be permitted along Epping Road. (RMS- previous submission)

A Construction Traffic Management Plan detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to Council prior to the issue of a Construction Certificate. (RMS- previous submission)

The proposed development should be designed such that road traffic noise from Epping road is mitigated by durable materials in order to satisfy the requirements for habitable rooms under Clause 102

The applicable parking rates (1 space per 40m²) is adopted in Condition C5 of the Concept Plan Approval for MP10_0112.

All car parking and service areas comply with AS2890.1 and AS2890.2. Not relevant to the proposed modification.

This is achieved under the current design. Not relevant to the proposed modification.

This is provided. Not relevant to the proposed modification.

This is noted and will form part of the Construction Traffic Management Plan to be submitted to Council prior to the issue of the Construction Certificate. Not relevant to the proposed modification.

A Construction Traffic Management Plan will be submitted to Council prior to the issue of the Construction Certificate. Not relevant to the proposed modification.

Not relevant to the proposed modification.

PLANNING CONCERN

URBIS

subdivision 3 of the SEPP (Infrastructure) 2007. (RMS- previous submission)

All works associated with the proposed development shall be at no cost to the RMS. (RMS- previous submission)

Noted. Not relevant to the proposed modification.

To facilitate a left in only access the proponent is required to construct a deceleration lane. (RMS- previous submission)

This condition has subsequently been removed. The RMS no longer supports access from Epping Road. Not relevant to the proposed modification.

DETERMINING AUTHORITY

The modification seeks to take the power to approve changes to the density and parking away from Council, which has been granted by the PAC, and put it into the hands of the DP&I. Believe that this authority should remain with Ryde Council as deemed. Council has the local planning knowledge to back up any decision to change densities. (name withheld)

The PAC is the relevant consent authority pursuant to the Environmental Planning and Assessment Act. Furthermore the PAC has consulted Council with respect of the proposed modification, and previous applications.

The current concept plan has been approved by the independent body, the PAC. Any modification to this plan should be considered by the PAC and not the DP&I. Best practice, and to allay the concerns of objectors, says that this decision should lie with an independent arbiter, and be delegated back to PAC for a decision.(name withheld)

Noted.

Any decision to approve this modification and increase the density on this site will confirm to all developers that local Council planning restrictions, and the independent decision of the PAC, are a joke, and that DP&I can be relied upon to help them to bypass them. This is the tactic currently being used by developers with this and other transitional

Noted.

Part 3A applications and it is completely contrary to the rhetoric and the promises of the O'Farrell government. (name withheld)

OVERLOOKING

The proposed units are north facing. This is the direction towards the two bedrooms of a neighbouring unit, affecting the privacy of the bedrooms. (name withheld)

Residential Flat Design Codes (RFDC) compliant separation distances are maintained as part of the proposed modification, and are consistent with those approved by the PAC.

OVERSHADOWING

Neighbouring unit block is only 3 stories high. Shadows of the subject development will engulf the unit. (name withheld)

No change is proposed to building massing and building envelopes, and hence there will be no change to overshadowing as previously approved by the PAC.

NOISE

The noise from the air-conditioning from the proposed high rise will be deafening. (name withheld)

Comment noted. Not relevant to the proposed modification.

LANDSCAPING AND PLANTING

Plenty of trees should be planted to hide the wall of horror. (name withheld)

Not relevant to the proposed modification.

CHANGE IN UNIT MIX

The application is silent on what the implications will be for the site accommodating an increased resident population. It is Councils submission that genuine planning grounds need to be provided to the DP&I and to the PAC. If density and car parking increases are to be

Please refer to attached letter dated 13 November 2013 prepared by Urbis.

PLANNING CONCERN

URBIS

sustained on marketing data alone, then the need for planning as a discipline and as an activity of government is diminished. (Ryde City Council)

SOCIAL IMPACT ASSESSMENT

In light of changing circumstances, the SIA should be revisited and amplified. (City of Ryde Council)

OPEN SPACE

What is the difference in the amount of open space per residents if the approved scheme is compared to the proposed scheme? (City of Ryde Council)

Not relevant to the proposed modification.

Council's comment is contradictory of it's own Ryde DCP 2010 that requires a minimum 30% of the developable area of the site is to be provided as Landscaped Area within the Macquarie Park corridor, rather than provision of landscaping based on per resident basis.

Furthermore Condition B4 of PAC approval MP10_0112 requires a minimum provision of landscaped open space area within the central park area of 1,665m². The proposed modification does not result in a reduction of the minimum landscaped area required to the central park, other landscaped areas across the site or private courtyards at the ground floor.

The attached open space diagram demonstrates that development achieves the required 1,165m² of open space as per the condition of consent with dimensions included.

DEDICATION OF AFFORDABLE HOUSING UNITS

Schedule 4 attached to the current Modification application does not

The Statement of Commitments is to be updated to reflect that the proponent will provide 4 affordable housing units in total, including the provision of 2 units in Stage 1

reflect the Statement of Commitments which identified a dedication of two units in Stage 1 and two units in Stage 2 to Council for affordable housing. The wording in the table under the category of "affordable Housing" is assumed to be an oversight and should be rectified prior to determination to include the commitment that two dwellings within Stage 2 are also to be dedicated. (City of Ryde Council)

The wording of the commitment is that the dedicated units will be "appropriately sized and located". This provides an opportunity for the DP&I to put some rigour into those words to ensure that the units provided as "affordable" do not only represent the least saleable or most poorly located dwellings within the complex. And should have a minimum of two bedrooms and identification of the units should be made prior to the release of the Construction Certificate for the relevant stage. Handover of units should occur prior to the release of the Construction Certificate for the relevant stage. (City of Ryde Council)

and the provision of 2 units in Stage 2.

The proponent is providing 2 affordable housing units in Stage 1 of the proposed development. The details of each unit are identified below:

Unit 1 (G09)

Located: Ground Floor of Darwin Building; 1 x bedroom apartment; Internal Area 54m²; External courtyard 25m². SEPP 65 compliant in respect of solar access. 1 x parking space.

Unit 2 (G01)

Location: Ground floor Adelaide Building, 1 x bedroom apartment; Internal Area 54m²; External courtyard 15m². SEPP 65 compliant in respect of solar access. 1 x parking space.

The units being offered do not 'represent the least saleable or most poorly located dwellings within the complex'. The ground floor location of each unit gives provision of a generous external courtyard area, a parking space and each unit is SEPP65 compliant in relation to natural ventilation and solar access.

The conditions of consent only require the applicant to provide a total of 4 affordable housing units across the entire development, and it is unreasonable, that Council so

openly consider they have the right to pick and choose their preferred unit.

In fact the proponent considers that all units within the development are saleable, and do not represent poorly located and substandard dwellings.

The floor plans for each affordable housing unit are attached to identify the proposed detailed layout of each apartment.

AMENDMENT TO SOHO APARTMENTS

The proponent has submitted revised drawings for the Stage 2 plans at ground level, level 01 and level 02 for the Sydney building. These drawings show the revised Sydney building SOHO layout. The layout has been amended to address the recent design feedback from the City of Ryde Design Review Panel.

The feedback included:

- that the SOHO apartments within the Sydney building should clearly provide a commercial space at ground level with an apartment over, and
- increase the public stair width.

In order to achieve this, we have amended the plans and reduced the number of SOHO apartments in the Sydney building from 6 apartments to 3. Each SOHO has become much wider and increased in area, with the overall SOHO area footprint remaining about the same. The amended plans also show the amended stair and lift adjacent the Sydney building which were also part of the feedback we received.

Overall FSR remains at 2.28:1. The changes in GFA to the Sydney building at levels 00 and 01 are only minor and will result in an increase of 20m² GFA across levels 00 and 01 with the proposed modification. Notwithstanding the 20m² increase in GFA in the proposed amendments to the Soho apartments, the total GFA will be 51,139 m² as stated in the current modification application as submitted. Furthermore the GFA

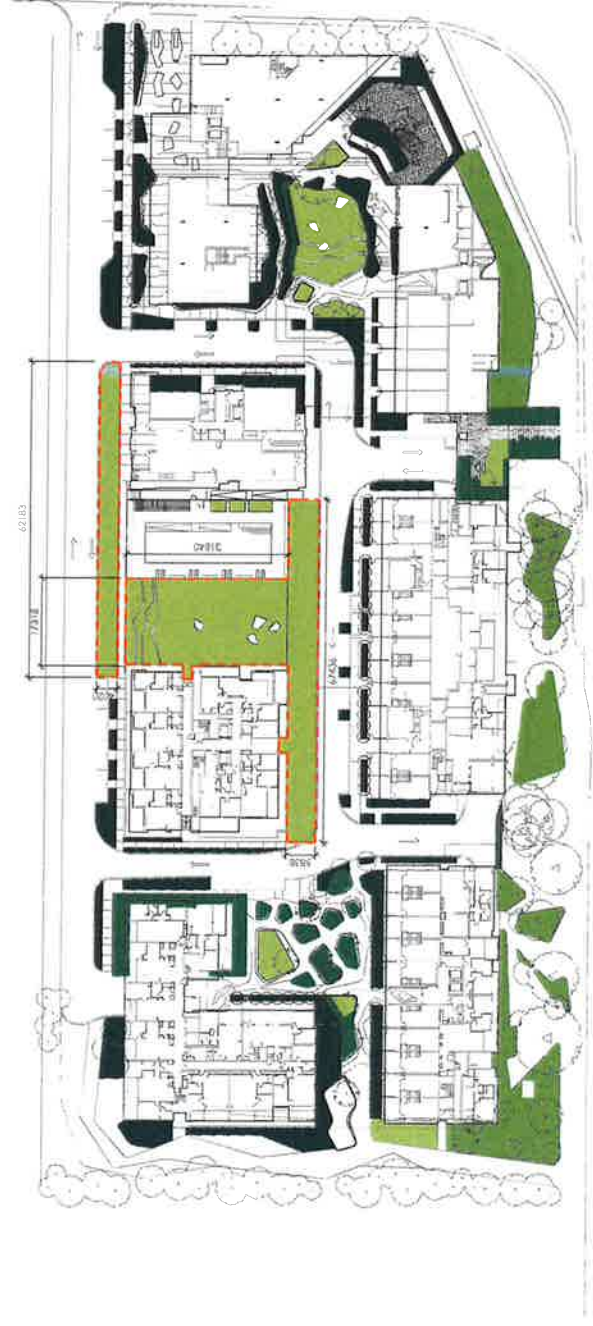


of Buildings H, W, C and Y will not exceed 26,160 m².

We note that the PAC approved Statement of Commitments requires 33 SOHOs. 32 SOHOs are currently shown on the June 75W drawings – (5 SOHOs only in the Sydney building). With the revised layout for the Sydney building, the overall figure is now 30. Therefore we propose to amend the Statement of Commitments in relation to the provision of SOHOs to include the following:

In order to ensure flexibility and options to live close to work, ~~33~~ 30 SOHO apartments will be provided across the development site.

The proposed amendments to the SOHO apartments will also require minor modifications to the elevation of the Sydney building. Revised plans for these elevations have also been provided.

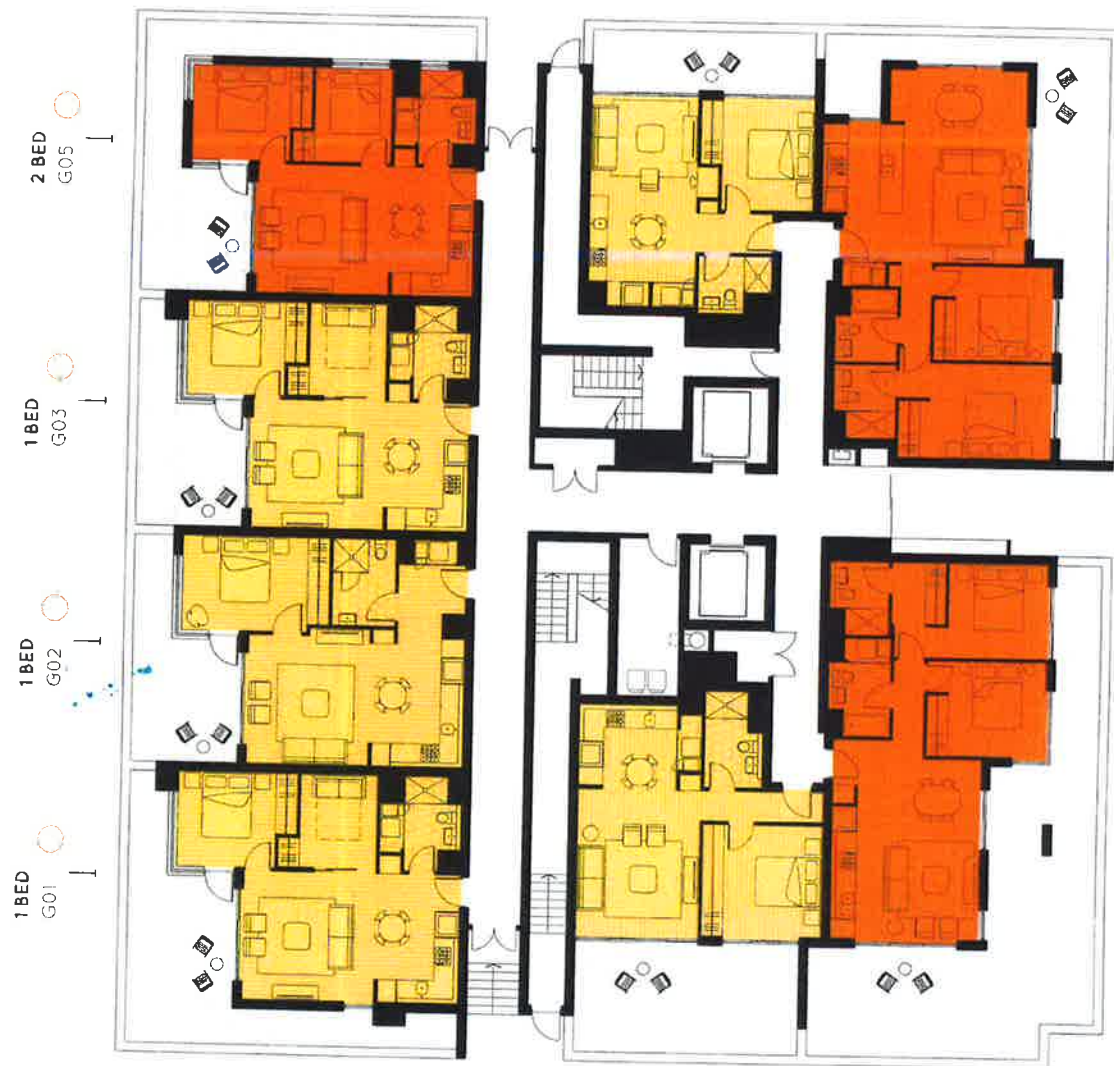


1:1000

CENTRAL OPEN SPACE (1165m² required)  1180m²



THE DARWIN - LOOKING SOUTH WEST - L'ETAT NORTHEAST CORNER



1 BED
G01

1 BED
G02

1 BED
G03

2 BED
G05

1 BED
G09

2 BED
G08

1 BED
G06

2 BED
G07

1 BEDROOM
2 BEDROOM

THE DARWIN

GROUND LEVEL

ONE BEDROOM APARTMENT

609

Internal Area: 54m²

External Area: 25m

Total Area: 79m^2

Parking: 1

1800 700 880
www.mpviving.com.au

Developed by

STAMFORD
LAND CORPORATION LTD.



THE ADELAIDE - LOOKING SOUTH AT THE NORTH CORNER



- 1 BEDROOM
- 2 BEDROOM

THE ADELAIDE

GROUND LEVEL



Macquarie
Park
Village



0 0.5 1 2 6 m

THE ADELAIDE

ONE BEDROOM + MEDIA APARTMENT

G01

Internal Area: 54m²

External Area: 15m²

Total Area: 69m²

Parking: 1

1800 700 880

www.mpvliving.com.au

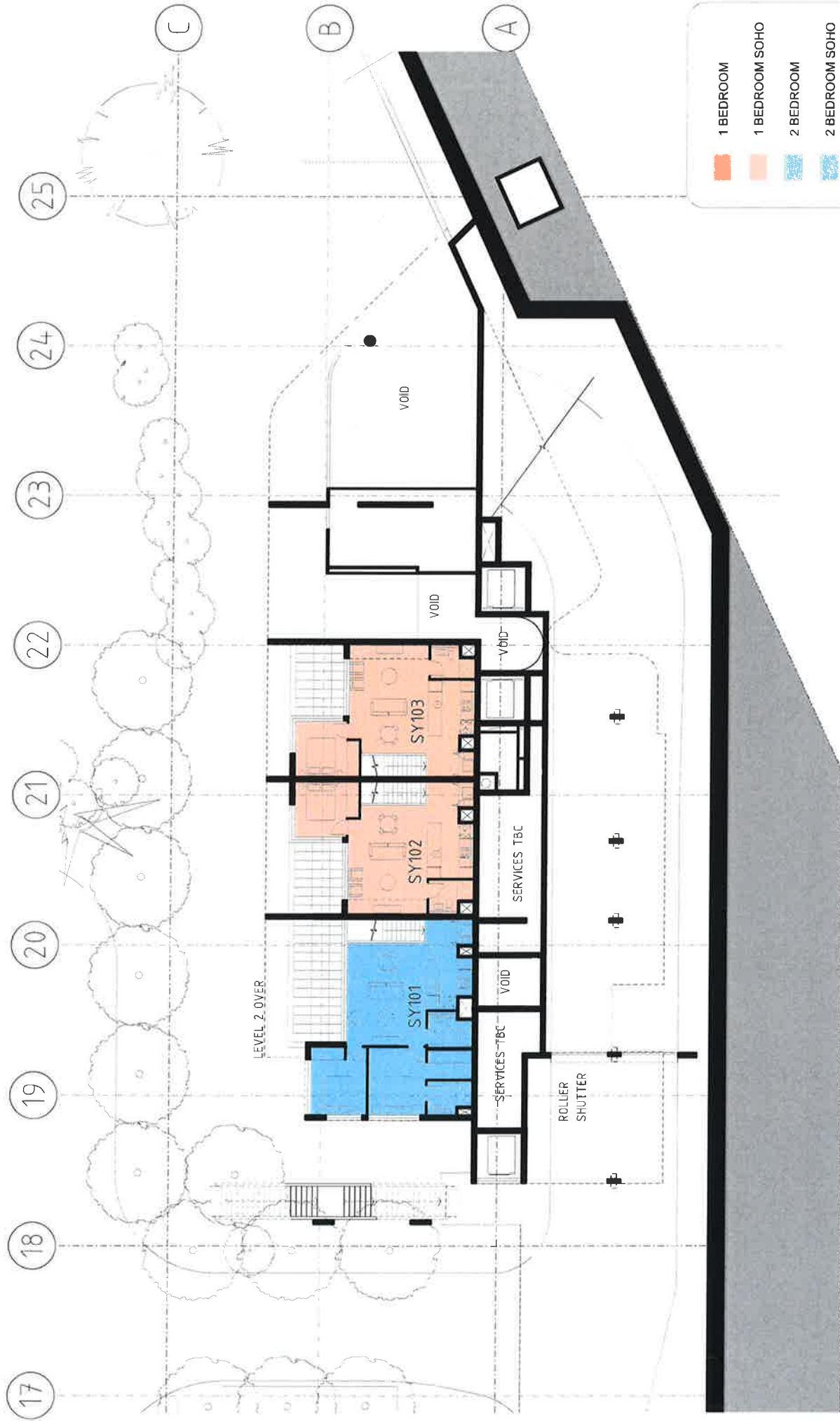
Developed by



STAMFORD
LAND CORPORATION LTD

CBRE

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- 1 BEDROOM
- 1 BEDROOM SOHO
- 2 BEDROOM
- 2 BEDROOM SOHO
- 3 BEDROOM

BUILDING SYDNEY LEVEL 01 FLOOR PLAN - REVISION 05

10030 1:200 at A3 14/11/2013

Macquarie Park Village

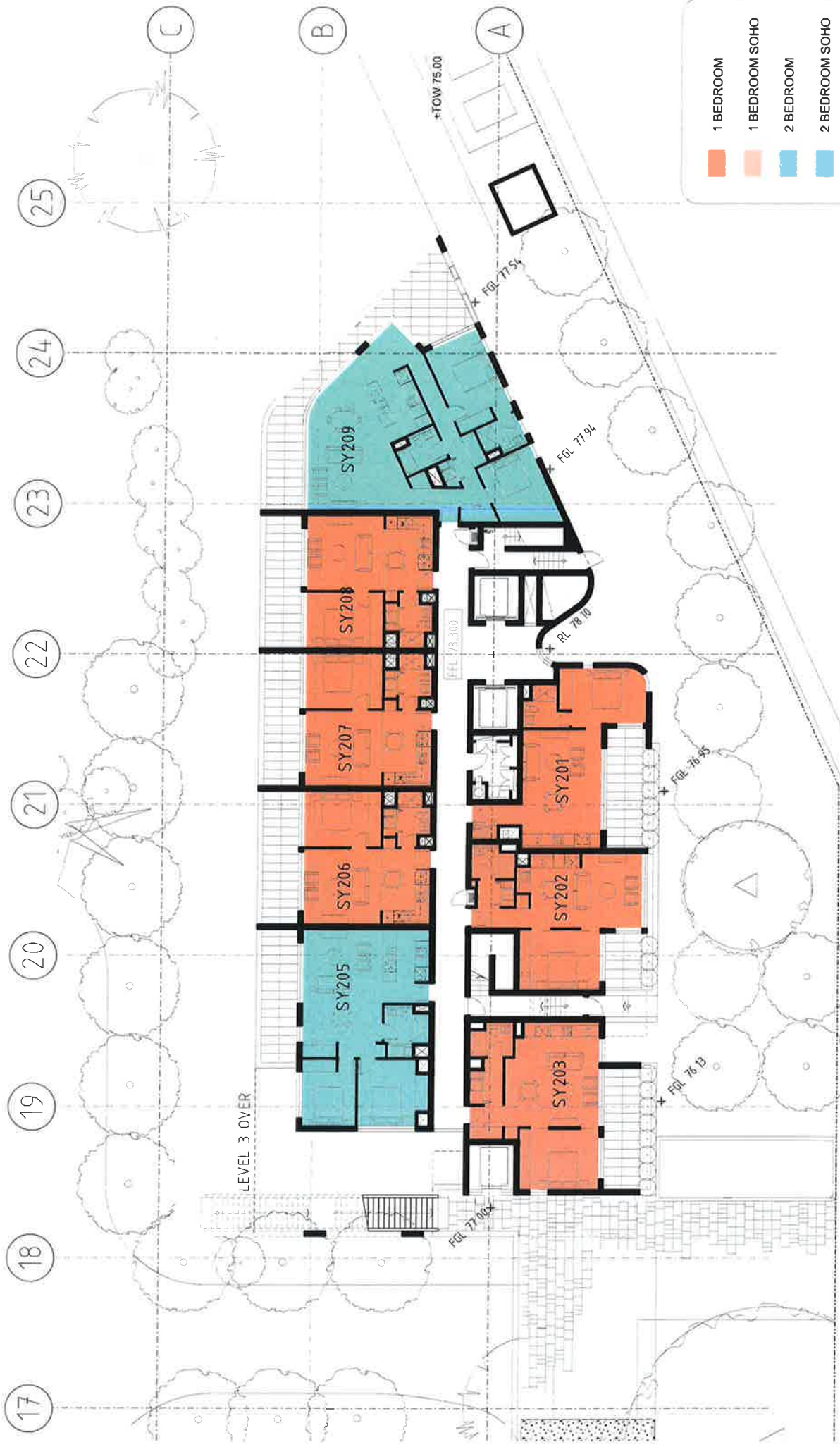
NOTE: AREAS ARE APPROXIMATE AND SUBJECT TO CHANGE



AJ+C

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10030_SK_PL_01.dgn



- 1 BEDROOM
- 1 BEDROOM SOHO
- 2 BEDROOM
- 2 BEDROOM SOHO
- 3 BEDROOM

15 November 2013

Ms Jane Flanagan
Senior Planner
NSW Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Jane,

MP10_0112 & MP10_0113 MODS - Stamford Macquarie Park

We are writing to you in response to our discussions this week regarding the proposed revised SOHO apartment's arrangement for MP10_0112 and MP10_0113.

Please find attached Stage 2 plans at ground level, level 01 and level 02 for the Sydney building. These drawing show the revised Sydney building SOHO layout. The layout has been amended to address the recent design feedback from the City of Ryde Design Review Panel. The feedback included:

- that the SOHO apartments within the Sydney building should clearly provide a commercial space at ground level with an apartment over, and
- increase the public stair width.

In order to achieve this, we have amended the plans and reduced the number of SOHA apartments in the Sydney building from 6 apartments to 3. Each SOHO has become much wider and increased in area, with the overall SOHO area footprint remaining about the same. The amended plans also show the amended stair and lift adjacent the Sydney building which were also part of the feedback we received.

Overall FSR remains at 2.28:1. The changes in GFA to the Sydney building at levels 00 and 01 are only minor and will result in an increase of 20m² GFA across levels 00 and 01 with the proposed modification.

We note that the PAC approved Statement of Commitments requires 33 SOHOs. 32 SOHOs are currently shown on the June 75W drawings – (5 SOHOs only in the Sydney building). With the revised layout for the Sydney building, the overall figure is now 30. Therefore we propose to amend the Statement of Commitments in relation to the provision of SOHOs to include the following:

In order to ensure flexibility and options to live close to work, ~~33~~ 30 SOHO apartments will be provided across the development site.

The proposed amendments to the SOHO apartments will also require minor modifications to the elevation of the Sydney building. These plans are currently being prepared and will be provided in the next 7 days.

We would appreciate if this modification to reduce the provision of the number of SOHOs could be considered in the current modification.

If you require any further clarification or information then please do not hesitate to contact me on 02 8233 7609.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M. O'Donnell', is positioned above the printed name.

Matthew O'Donnell
Associate Director