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11 October 2010

Mr Angus MacInnes
Lewisham Estates Pty Ltd
Level 2, 7 Charles Street
Parramatta NSW 2150

Dear Mr MacInnes,

78 – 90 Old Canterbury Road, Lewisham – Master Plan Study
Letter of Support

We are writing with regard to the proposed concept plan for 78 – 90 Old Canterbury Road, Lewisham, prepared by Tony Owen Partners.

1 Background

The subject site is former industrial land, generally bounded by Old Canterbury Road, William Street, Brown Street, Longport Street, a disused freight line earmarked for a new light rail line and station, and Hudson Street. It has been identified as suitable for redevelopment as mixed use on a subregional level, and was brought for consideration under Part 3A of the EP&A Act in March 2009. It is the subject of the McGill Street Precinct Master Plan, and the DGRs require consideration of the objectives of that Master Plan. It is a large, consolidated and highly connected site, proximate to major roads and bus routes, heavy rail and potentially light rail stations. Victoria Street (the main street and access point to Lewisham station) is the nearest centre to the site, about 125 – 150m from the site. A low order (neighbourhood) centre, there is very little retail activity along Victoria Street, although strong evidence of former activity from the number of disused shopfronts, shown in **Attachment 1**.

Marrickville Urban Strategy (April 2007) establishes a series of key action points that are relevant to redevelopment around Lewisham Station. These include encouraging urban renewal (1.1), increasing residential density (1.2) and investigating opportunities to support centre revitalisation (4.2). In March 2009, olsson & associates architects presented site amalgamation studies to Marrickville Council, as a specific evaluation of the implementation of the Marrickville Urban Strategy. The sites included 'Precinct 13' on Victoria Street, and Precinct G, being the block bounded by Jubilee Street, Railway Terrace, Victoria Street and Old Canterbury Road. The studies envisage a near total renewal in those precincts, and strengthen Victoria Street as the main street of Lewisham.

In November 2009, council endorsed a master plan prepared by Hassell for the area bounded by Longport Street, Old Canterbury Road and the disused rail line, known as the McGill Street Precinct. The McGill Street Precinct Master Plan was prepared at a local level in response to the declaration of the site[1], although it is for a larger area. Nevertheless, the majority of the proposals in that master plan impact on the site. The McGill Street Precinct Master Plan provides a general framework for refinement of the concept plan, and the objectives of the plan are a consideration here.

The Metropolitan Transport Plan 2010, released in February 2010, also includes a funding commitment for the extension of the Dulwich Hill light rail line to Lilyfield, with an indicative light rail station immediately adjacent to the site, "Lewisham Interchange". As the name suggests, this establishes an intermodal hub, for which priority links would run east-west from the light rail line to Victoria Street.

[1] Marrickville Council, Land Use, Assets and Corporate Committee Meeting minutes, 10 November 2009, p1

2 Site Analysis – Key Urban Design Principles

The site analysis prepared by Tony Owen Partners demonstrates the following principles:

- The site is well placed to satisfy the subregional and local planning aims of increased residential density around public transport, particularly given the existing train station and recent Transport Plan announcement of a light rail extension and stop immediately adjacent to the site. The site is also proximate to major bus routes along Parramatta and New Canterbury Roads;
- The site is suitable for increased density in keeping with the Metropolitan Plan, Transport Plan and local density targets, and given the bulk and scale of the adjacent silos of up to 7 storeys (equivalent).
- The existing pattern of commercial use on Victoria Street adjacent to the southern entrance to Lewisham Station can be intensified with strong east-west connections from the site to the station along Jubilee Street (and Jubilee Lane, with through-site connections), as well as Henry Street.
- The block and street pattern shows a fine grain pattern of SW-NE and N-S grids in and around the precinct;
- The site is proximate to multiple forms of open space, including playing fields on West Street, pocket parks and a proposed linear park. Otherwise the site has some remnant vegetation which may be integrated into the streetscape of the new precinct, and a pattern of east-west links to Victoria Street could strengthen the green network on the eastern side of the light rail corridor;
- The site is highly accessible from public transport and has local accessibility to limited retail, and to schools, churches, child care, aged care and community facilities beyond. A precinct plan that concentrates traffic on routes that feed this neighbourhood centre could strengthen the retail offering in the local area, and extend commercial uses into the site.

3 Marrickville Urban Strategy and Marrickville Employment Lands Study

The Marrickville Urban Strategy (2007) established six urban renewal approaches to inform policy options for future residential development being:

1. Focus on residential density in and around centres;
2. Focus on commercial zoned land in centres;
3. Rezone select industrial sites;
4. Develop new centres;
5. Rezone select special uses sites; and
6. Increase density in infill areas

The site forms part of Renewal Approach item 1 and is specifically named in item 3, as a selected industrial site to be rezoned to cater for residential housing demand, address local amenity and provide space for community facilities. It would be subject to strict rezoning criteria including:

- location close to a centre;
- redundant from historical-industry perspective;
- well serviced by public transport;
- within walking distance of public open space;
- development can occur in a way that responds to aircraft, road or rail noise;
- opportunities for improved public domain;

- not located close to strategic assets (port, airport or freight lines); and
- rezoning would not result in conflicts between residential uses (if located close to a centre and proximate to public transport).

The target for future dwellings proposes that Marrickville Council plan for 3,830 dwellings over 25 years. To accommodate future housing demand a series of action points are identified, including:

- encouraging urban renewal (1.1),
- increasing residential density (1.2)
- reviewing development controls for centres
- selective rezoning of industrial sites
- investigating major sites for new centres
- reviewing special use sites for dwelling potential; and
- investigating opportunities to support centre revitalisation (4.2).

Lewisham is identified as a neighbourhood centre, and the area around the station a focus for renewal for new housing, improved access to parks and public domain (Urban Strategy Map). The key Urban Strategy direction for the area is to focus on new residential development in existing centres with good public transport and services to improve housing choice (4.7.2)

In 2009, Marrickville Council commissioned olsson & associates to undertake a Village Centres Urban Design Study. The study extracted several key actions from the MUS relevant to village centres, including encouraging urban renewal in and around centres (1.1), increasing residential densities in commercial zones (1.2) and investigating opportunities to support centre revitalisation (4.2). While the MUS earmarks 1150 dwellings in and around centres, of which 500 are allocated to commercial zones, the study found opportunities for 1625 dwellings or more.

The study identifies the centre catchment for Lewisham Station as centred on the platform, which takes into account the block bounded by Jubilee Street, Victoria Street, Railway Terrace and Old Canterbury Road, as well as part of the McGill Street Precinct and Victoria Street shops. In fact, the topography and current station entrances would indicate that the centre is more properly SE of that point, at the entrance to the station, taking in Henry Street and the mid-block entrance to the McGill Street Precinct, as well as more of Victoria Street. Nevertheless, the study properly identifies Victoria Street as the future main street (see **Figure 1** below), with retail ground floor uses, and notwithstanding LEP111, recommends that almost all of the blocks within the study area are demolished and replaced with new four storey apartments, rising to 5 storeys on Old Canterbury Road.

Figure 1 – Strengthening Victoria Street as Lewisham's main street (Olsson study, s2 – Lewisham, pp 9 – 10)

The Marrickville Employment Lands Study (2008) identifies the McGill Street precinct as Category 3 – *"appropriate to support a level of intensification and diversification of employment uses on either part or all of the site. Four of the sites are ideally suited to a mix of residential and employment uses (although ANEF is a potential limitation to residential development on three of the sites)".* (page 59),

although the report goes on to state that the McGill Street Precinct is outside the 25 ANEF (page 78). The study recommends the following zones (page 76, emphasis added):

- **B3 Local Centre.** Zoning would be appropriate in locations where industrial land might be utilised to grow an existing centre (e.g. sites on Addison Road, Marrickville or within the McGill Street precinct, Lewisham). If higher density housing is also desirable in such locations, Residential flat buildings may be added to as a permissible use in this zone, or alternatively, made permissible in selected locations via Clause 2.5 and Schedule 1 of the LEP template "Additional permitted uses for particular land". In either case, a minimum proportion of retail and/or commercial uses should be specified to ensure that the retail and service elements of land identified as a Local Centre are realised. This may be achieved through either local provisions within the LEP or, for a more flexible approach, within a DCP.
- **RE1 Public Recreation.** This zoning would be appropriate is locations where new public open space is provided to support the intensification of employment and/or residential development in a particular location (e.g. new local park or plaza at the McGill Street precinct).

Recommendations for the McGill Street Precinct are expanded to include (page 77):

1. *Precinct should be rezoned to permit a mix of residential development and a broad range of low impact employment uses. Possible zonings could include B3 Neighbourhood Centre, B4 Mixed Use, R4 High Density Residential and RE1 Public Recreation. Areas located adjacent to busy roads could be zoned B5 Business Development or B6 Enterprise Corridor Zoning that allow a broad range of employment uses and prohibit or restrict residential uses.*
2. *Zoning and other planning controls should seek to permit a broad range of activities that are directly or indirectly associated with cultural industries.*
3. *Rezoning of the site should be accompanied by more detailed planning controls addressing issues such as:*
    - *locations of new streets, new public open space, active frontages, activity nodes*
    - *local road widening, intersection upgrades and requirements for public domain improvements*
    - *mix of uses on the site (e.g. minimum 20% commercial/retail and/or maximum 70% residential)*
    - *preferred building envelopes and maximum floor space ratios*
    - *preferred locations of vehicular entries*
    - *encouraging the provision of live/work dwellings*

4 Metropolitan Transport Plan

In February 2010, funding commitment was given to the light rail extension from Lilyfield to Dulwich Hill, including an indicative station adjacent to the site (Lewisham Interchange), and another station immediately south (Old Canterbury Road). This light rail was anticipated in the McGill Street Master Plan and the role of the site in strengthening cross links between the station is a consideration in all recent plans.

On 17 May 2010, the "Sydney Light Rail – Inner West Extension Study" draft report was released. The report recommends, inter alia, that the Lewisham Interchange station be located either immediately north or south of Longport Street, and that Old Canterbury Road station be located on the southern tip of the McGill Street Precinct. The northerly location of both stations shifts the focus from the centre of the McGill Street precinct, and would vitiate the need for a large entry plaza at the centre of the site.

Further, a location on the south side of Longport Street creates a better pedestrian link to Lewisham and Summer Hill centres as shown in **Attachment B** than the central station, although both are supportable. Nevertheless, the final location will need to be taken into account in the development of detailed plans, and the strong, porous retail centre to the north of the site in the concept plan is better placed to respond to this refinement than the McGill Street Master Plan. In further iterations of the

McGill Street master plan, it may be that two foci are required – a larger network connecting to Lewisham and Summer Hill via Lewisham Interchange to the north, and a smaller gateway on the southern tip of the Precinct around Old Canterbury Road station.

In relation to the placement of the light rail station, it is recommended that Lewisham Interchange (South) adopted. Significant level changes between the light rail and heavy rail corridors are likely to require an engineered solution to any direct connection between the stations, working against any potential activation of Longport Street. Funnelling pedestrians through such a connection is also likely to divert further pedestrian energy from Victoria Street, already languishing as a low order centre, rather than using existing street-based networks for pedestrian flows, which would strengthen it. Within the site, there is greater opportunity for a clear entry sequence through a plaza, and convenience retail, which are desirable adjacencies.

5 McGill Street Master Plan

The McGill Street Master Plan Report, which considers many of the above studies and proposals, sets out a series of considerations for the master plan, summarised as follows:

- The precinct would benefit from finer grain pedestrian connections and small scale linkages;
- The proposed uses [*sic*] should respond to the [fine grained residential] context;
- The site is designated as most suitable for predominantly high density residential development combined with some live/work and minor supporting retail and community service uses;
- Marrickville council have identified the vicinity around Lewisham train station and Old Canterbury Road for medium housing of up to 4 storeys;
- The precinct can cater for the residential housing demand in the area. Local amenity and links across the precinct to the Summer Hill local centre needs to also be considered;
- Significant trees and natural areas need to be valued, with the nearest Park (Petersham Park) being 1km away on the far side of the rail line, creating a need for active and passive outdoor space, as well as green links to the GreenWay.
- New development should respect the existing built environment and any identified heritage significance. Consideration should be given to the potential significance of existing industrial buildings. (*No heritage items are identified on the site in Marrickville Council's Heritage Map*).
- The master plan should improve views to the GreenWay to make it more accessible

The Report also comments that:

- There is good pedestrian connectivity to bus stops and train stations, with the lack of opportunities to cross Old Canterbury Road as the only [identified] difficulty.
- The existing goods line has been identified by the Marrickville Urban Strategy as a GreenWay Corridor (from the Cooks River to Iron Cove) for biodiversity, recreation, light rail, pedestrian and cycle paths. The Greenway may become a regional cycleway connection.
- The proposed light rail extension would provide an additional local transport option, being at right angles to the Western Line, and with a stop proposed next to the site.
- The site has main road frontage on Old Canterbury Road from which vehicular access is possible. The intersection of Old Canterbury Road and Longport Street is a busy intersection, and there is heavy traffic along Longport Street [making it less suitable for connections].

This forms the basis for three master planning strategies, which supplant the "*objectives of the Urban Design Study for McGill Street, Lewisham and St Peters 'triangle'*." They are:

1. **Accessing the Greenway and provide local open space**
   Create links to integrate with open space

2. **Connect existing centres and provide local retail uses**
   Help strengthen local identity

3. **Step building heights and improve permeability**
   Be a good neighbour – respect surrounding context and respond politely to it.

The considerations and strategies are generally a good statement of design of the precinct. They are however flawed in some respects, which are worthy of comment as they affect the subject site:

Accessing the Greenway and Provide Local Open Space

While the GreenWay corridor is not clearly defined, it is described by the GreenWay Sustainability Project site as *"The corridor continues north along the freight rail line, and in Summer Hill, along the tidal sections of Hawthorne Canal, which enters the Parramatta River at Iron Cove*."[2] (emphasis added). In the local context of the McGill Street Precinct, this would indicate that the GreenWay affects the southern edge of the site (south-west of McGill Street), but crosses to the western portion of the light rail tracks below Hudson Street, meandering along the existing canal and open space west of the future light rail line. North of the site, Grosvenor Crescent to the north-east provides the major connection under the heavy rail line to the north. Connections across the McGill Street Precinct to this linear park system will be important, but the GreenWay itself is unlikely to continue along the McGill Street Precinct side of the tracks, particularly given the level changes across Longport Street and the major rail embankment. Likewise, due to the geometry of Old Canterbury Road, any linear green space in this location is not likely to provide motorists with much more than a glimpse of the green space, particularly given the dominance and accessibility of the GreenWay itself from Old Canterbury Road south-west of the site, and Longport Street north-west of the site.

The argument for passive recreation space in the master plan report also fails to identify Morton Park, a major open space 550m away from the site with almost direct pedestrian access down Toothill St, and on the same side of the tracks as the McGill Street Precinct. Nevertheless, a quantum of open space is desirable for amenity in the McGill Street Precinct, and this type of open space was previously identified by the Employment Lands Study. Urbis recommends that open space is provided for residents' needs, but contends that the large linear park shown in the McGill Street Master Plan over-caters to actual requirements. Green links to the site from the west are also shown for this strategy, and this approach of using street trees to create narrow green links is supported. See **Attachment B**.

Connect Existing Centres and Provide Local Retail Uses

The strategy identified here – to complement rather than compete with the local centres – is supportable, as is providing a bridge between Lewisham neighbourhood centre and Summer Hill village centre. However, the prescribed method set out in the strategy – supporting Hudson Street as the active main street, with a "relaxed café-type lifestyle" is not explained. In fact, there is substantial evidence of Victoria Street having had this local character from the abandoned shopfronts (see Appendix 1), which the olsson study seeks to revive. Promoting this scale of retail (cafés, restaurants, gallery, commercial and studio spaces) on the McGill Street precinct would delay, and potentially stymie, the revitalisation of this languishing commercial strip.

On the other hand, Lewisham lacks a food market for weekly needs, and the existing small supermarket (about 2,000sqm) in Summer Hill is a kilometre away, with limited choice. A full-line supermarket (about 3,000sqm) would give Lewisham a complementary retail offering, introduce a greater range of goods (particularly fresh food) to both Lewisham and Summer Hill as well as fostering healthy local competition in the supermarket sector – as the net community benefit test is intended to

[2] http://www.greenway.org.au "About the GreenWay Corridor", accessed 25 May 2010

confirm. It is also suitably located for evening shopping for light rail commuters (much as Franklins experiences evening shopping trade from Summer Hill station).

A supermarket and speciality offering is of a different scale and function to the main streets, particularly in the manner in which the former caters for predominantly weekly needs, as opposed to daily needs (such as bakeries) and leisure retail (such as cafes and fashion). Such an offering would therefore be a good complementary use. Located midway between the two centres, and within 5 – 10 minutes of each, it would also facilitate good cross connections between the centres and employment opportunities, a consideration in the development of the McGill Street Precinct according to the Marrickville Employment Lands Study.

Secondly, a better approach to pedestrian movement would be to identify and strengthen a number of fine grain routes – not just Jubilee Street but also Henry Street (which would support former retail shopfronts along Victoria Street and existing medical uses on the corner of Henry Street and Old Canterbury Road, as well as providing a direct pedestrian route down Hudson Street). Conversely, multiple pedestrian routes through the site, particularly and a retail offering further north of Hudson Street is a better approach to McGill Street Precinct planning, with pedestrian movement likely to take a number of paths, including the shortest linear distance, down Longport Street. See **Attachment B**.

Step Building Heights and Improve Permeability

This strategy is supported. We note that in the master plan, the shared access way is illustrated as running along the light rail line to Longport Street, without car access to Longport Street. This allows pedestrian and cycle network to be permeable, and retain 'street front' activity along most of the shared way, without introducing a potentially problematic new intersection on Longport Street.

We also note that some of the distribution of height in the master plan could be refined. First, the olsson study shows 5 storeys in Precinct G facing Old Canterbury Road, and suggest that there may be scope to increase the height to 5 storeys along Old Canterbury Road, from which western building heights would step up. Second, while the site opposite Jubilee Street has been identified as a 'signature site', there is little explanation of this, and the development controls diverge from this interpretation, giving no additional weight to that site. As shown in Figure 2, the result is unlikely to have a particular signature presence, without the benefit from additional height. Mindful however of the general strategy of stepping height towards the rear, perhaps the signature site nomination is less persuasive, and a tempered approach to this corner building is appropriate. Nevertheless, if this approach is to be adopted from the McGill Street Master Plan, then a cohesive landmark and gateway strategy (see **Attachment C**) should be undertaken for the site and exceptions to the general height planes should be established on this basis.

Figure 2 – Unremarkable Entry (left), based on existing office renovation on the corner of Crown and Campbell Streets, Surry Hills (right) (Hassell, McGill Street Precinct Master Plan Report pp 39, 56)

6 Non-Retail Employment Uses

The Employment Land Study strongly identifies the site for employment uses. The ELS arrives at this conclusion reductively, by establishing:

- a notional surplus of 277,900sqm, less
- 'airport proximate and core employment' (heavy industry) (reducing the surplus to 69,157); and
- the exclusion of 'category 1' fragmented lots (resulting in a net deficit of 14,823sqm).

While this analysis is numerically compelling, it does not establish a strong rationale for why the McGill Street precinct is a good employment centre – rather it is a site which is allocated employment for convenience, as an unconstrained amalgamated, low noise impact site. Strategic planning requires something more in order to allocate this quantum of employment uses to this given site – and that nexus – which ought to be found in the metropolitan strategy – is lacking, with the ranking of Lewisham as a low order (neighbourhood) centre. From a strategic perspective, locating significant employment uses here would be inconsistent with the principles of intensification and planning certainty that the Department currently espouses for zoning of commercial land. In this case, the Metropolitan Strategy concentrates local employment instead on the Major Centre of Burwood to the west, and the enterprise corridors of Parramatta Road to the north, and Canterbury Road to the south.

It is therefore not unusual that both the McGill Street master plan and the concept plan downplay other (non-retail) employment uses on site, catering for local retail needs only. This is not to say that some form of local employment, such as live/work units is still desirable, and the area is a good site for the 'creative class' of businesses, which generally seek out out-of-centre locations with high amenity. More granular businesses are also more compatible with residential uses, not greatly differing in their spatial requirements and traffic impacts. Some form of ground floor activation is desirable in any event along the key pathways that link Summer Hill and Lewisham centres (see **Attachment B**). To encourage this form of low-impact economic activity, planning controls could be set, such as by identifying key streets pathways along which:

- a flexible floorplate on the ground floor (non-structural internal walls, at grade floor) is required;
- a minimum 3.3m floor to ceiling height on the ground floor is adopted;
- zero or small setbacks are adopted; and
- non-residential use is encouraged (such as through FSR bonuses/carve outs for small office/home office, and the like).

7 Synthesis of Local Strategies and Site Analysis

The master plan prepared by Tony Owen Partners demonstrates a number of principles that are consistent with the site analysis, Marrickville Urban Strategy and Employment Lands Study and strategies of the McGill Street Precinct Master Plan, as follows:

<u>Accessing the Greenway and provide local open space</u>

- Significant trees and natural areas are valued, with outdoor space for residents, as well as green links to the GreenWay, illustrated in 4.2.
- The 'well landscaped central courtyards' from the McGill Street Precinct Master Plan (also being 'local parks or plazas' from the Marrickville Employment Lands Study) have been included, with the major courtyards opening on to the central street. A green link to the light rail station provides a direct physical connection for walking and cycling access to the GreenWay corridor.
- The shared access way alongside the light rail corridor has been adopted.

Connect existing centres and provide local retail uses

- The olsson study indicates a desire to extend development west from Victoria Street along Jubilee Street. Pedestrian desire lines would also indicate that the primary routes between Summer Hill and Lewisham centres would be along Longport Street or the best northerly pedestrian friendly route parallel to it – likely to be along Jubilee Street and through the site. The concept plan reflects these desire lines, showing a local node in the north-east of the site, and potential for nodes on Henry Street and at the light rail line – slightly to the north of Hudson Street (which may require realignment as a result). On this basis, locating the primary retail offering in the McGill Street Precinct to the north of the site would be supported, particularly if a strong pedestrian connection can be made from the site to the large GreenWay park to the north-west of the precinct formed by the curve of Hawthorne Canal.

  The olsson study also focuses on reaffirming Victoria Street as the main street of Lewisham south of the railway station. Taken together with the McGill Street precinct, this establishes a contiguous renewal precinct spanning from the future light rail station to Lewisham Station, running parallel to the heavy rail tracks.

  The local retail and commercial uses are equivalent to a 'B3' (now B2) Local Centre zoning as recommended by the Marrickville Employment Lands Study (2008), with a strong commercial presence recommended on the site. The study recommends a 20% minimum commercial and 70% maximum residential mix, which has been adopted in the DGRs. The McGill Street Precinct Master Plan report adopts a predominantly residential mix, with an average 83% residential, 5% retail and 12% office across the precinct, with a local mix of 92% residential, 2.5% retail and 5.5% office uses on the site. This is below the minimum recommended mix, and may indicate a tension between the current housing shortage and the shortage of commercial floorspace identified in 2008.

  Nevertheless, de-emphasising 'block 1' (the site) in the McGill Street master plan as a commercial site is at odds with pedestrian desire lines between the Lewisham and Summer Hill centres (where one would expect retail to be located). Even if the McGill Street Precinct Master Plan envelopes for the site were adopted, a 20% flexible allocation to commercial or retail uses would require 4,450sqm to be allocated to these uses, more than double the precinct master plan allocation. However, as discussed below, the envelopes shown in the McGill Street Precinct master plan could be increased, and in those circumstances, a larger quantum of commercial space may be appropriate.

- While a split between office and retail space is desirable to ensure a mix of live/work units as well as retail, there is sound logic behind the provision of a local supermarket on the site, and a larger quantum of retail space to accommodate this would need to be made. The absence of other suitable sites for free floorplate retail must also be a consideration in this allocation.

Step building heights and improve permeability

- Building heights respect the existing built environment, and gradates from lower scale built form on Old Canterbury Road to higher density development which is concentrated on the Greenway. Buildings front onto the light rail corridor to help define the corridor and provide overlooking. The maximum height in storeys in the proposal equals the maximum height in storeys proposed by the McGill Street Precinct Plan.

  As a general comment, a height to width ratio of 1:1 is generally accepted as a baseline for good street definition (although many great streets exceed this ratio). For example, the McGill Street Master Plan Report states at page 51 that "the height of buildings successfully integrates into the streetscape without dominating it" with an indicative street section of McGill Street, showing a 4 storey (~12m) building mass, with building separation of 12.6m. Using the same metric, and a minimum width of the light rail corridor of 40m (assuming the shared

access way will be located within the corridor), the minimum number of storeys required to provide proper definition to this linear space would be 14 storeys.

Nevertheless, we note the Department's comments regarding overall height and density in relation to a 14 storey scheme, and there are a number of alternative methods of arriving at good urban form. These include setting height by reference to desired future character (epitomised by the Olssen Study) as well as a gateway and landmark strategy, taking its cue from the adjacent Allied Mills plant. These strategies are shown at **Attachment C**.

Here, the height of the Allied Mills Site appears to be the main consideration in both the McGill Street Master Plan and the concept plan, supporting a maximum height of 9 storeys. The creation of a 9 storey building wall along the light rail corridor is supported on the basis of defining the light rail corridor.

- A finer grain pedestrian connections and small scale linkages is created, illustrated in 4.1. This provides multiple pedestrian entry points into the site, including Hudson Street as a through-site link (among others), a finer grain network that that proposed in the McGill Street Master Plan. At ground level, the building mass has been broken down into a series of blocks defined by build edges, illustrated in 4.4.

- The Olsson study shows a height pattern that increases towards Old Canterbury Road, from four to five storeys. This is in variance to the heights shown in the McGill Street Precinct Master Plan, which lowers the facing street wall on Old Canterbury Road to 4 storeys, stepping up to 6 stores in the centre of the site, with the highest density located at the deep in the site proximate to the rail – 8 storeys to the south and 9 storeys to the north. The olsson study also shows typical densities of 1 – 1.3:1 for purely residential uses, and about 2:1 for mixed use near Lewisham station. The McGill Street Precinct Master Plan has a similar average FSR of 2:1, consistent with a mixed use zone, but shows a density gradient that increases the FSR to the south and east (furthest away from the neighbourhood centre), and brings the FSR in the northwest down to 1.7 – 1.8:1 (close to the centre). From this, there appears to be some scope between different studies undertaken recently for heights of 4 to 5 storeys along Old Canterbury Road, and for higher densities in mixed use zones to accommodate retail ground floors.

8 Site Amalgamation

It is noted that the DGRs seek the amalgamation of the corner of Longport Street and Old Canterbury Road. The concept plan demonstrates how the site may be developed over time, including this corner site, without necessitating an immediate amalgamation. The concept plan, following the McGill Street Precinct master plan, places new buildings on the site that respect the same massing lines as the existing lots. As a result, irrespective of whether these sites are developed, frontages to Old Canterbury Road and Longport Street will be aligned, and the William Street corridor will be well defined.

While the development of these residential lots would be desirable in the long term, there does not appear to be a strong compelling reason for requiring the fine grain of these lots and the existing street network to be lost. Given the prominence of this corner from the intersection of Longport Street and Old Canterbury Road, a staged approach may be desirable, both for allowing for variety of building forms, and to allow a patina to develop from architectural trends.

Urbis therefore recommends that the scheme be assessed on its merits whether or not site amalgamation is achieved.

9 Specific Urban Design Considerations

Urbis have been requested to comment on specific urban design considerations, to be read together with the principles dealt with in Tony Owen's master plan report. Our comments with respect to height,

pedestrian links, transport, access, public domain and open space are set out in detail above. Our remaining comments are as follows:

Design Quality Considerations

Quality design, materials and finishes is a significant consideration for any major development. There is a danger at concept design stage of being prescriptive about a particular design, material palette or finishes, with the result of restricting or homogenising the final outcome. Urbis believes that a high quality design – good (if not great) buildings – would be an asset to any major redevelopment. Given the scale of the buildings (greater than 3 storeys), architectural design under SEPP65 is a given. There are a number of systems that could be put in place for addressing design quality over and above SEPP65, including peer or panel design review, or delegation to council of individual building approvals once envelopes have been determined, based on design quality. At this stage, façade treatments, building articulation, colours and materials could all be taken into account as in the ordinary Part 4 process.

Setbacks between buildings and from streets is consistent with SEPP65 and the McGill Street Precinct Master Plan. One area of concern may be that both the McGill Street Master Plan and concept plan conceptually show a typical building separation for parallel adjacent apartments of 6m. Given the fine grain of street and laneways, including Hudson Street, smaller street sections and minimal block separation is desirable, and these configurations arguably reflect those aims. However, should the concept plan be approved, the individual design of buildings will need to ensure that openings to 6m setbacks from residential floors to these side boundaries are only from non-habitable rooms, staggered, or both, to mitigate any loss of privacy. Articulation of these buildings may also allow 9m pockets, which would allow for habitable rooms, particularly on buildings oriented N-S, to take advantage of north sun to the end apartment.

Public domain elements, including landscaping, should equally be of a high quality, but need not be highly programmed or designed. Informal play in the form of a pocket park is desirable in the local area, although the bend of Hawthorne Canal may take this role, and a gathering space proximate to the light rail station is also encouraged as such stations are natural congregation and meeting points. To this end, the hatched area indicated at the terminus of Hudson Street would be suitable for a hardscape plaza. As an important shared zone, detail design should consider a 'table top' design whereby cars mount to curb level and are guided through the space with linework or bollards, indicating to the driver that the pedestrian or cyclist has priority. The pocket park should be landscaped to allow for play equipment, with benches within sight of the play equipment, and unprogrammed turfed and shaded areas for communal gathering. Provision of BBQ facilities would also be encouraged.

CPTED

Territorial definition – The current configuration of buildings defines streets and pedestrian access ways, and creates a strong separation between public, communal and private realms. Minimal setbacks from footpaths and open space is encouraged for natural surveillance (below) as well as a strong delineation of realms. All parks are defined on 3 sides with a fourth side facing streets. The public domain plan has been annotated to demonstrate where the strong relationship between built form and open space (streets, parks) should be maintained, and the locations recommended for restricted access, at **Attachment D**.

Surveillance – The scheme has been designed with a high degree of surveillance of public open space. Street-based open space such as green links, and narrow aperture parks permit overlooking from apartments. Views through interconnected spaces allow alternative escape routes in the event of entrapment, and provide views into public space from adjacent high traffic areas. Where common open space lies off pedestrian paths, an access controlled space (such as keyholder parks) should be adopted, using open fencing (such as wrought iron posts) and gates, to create a visual link and permit actual egress, while inhibiting unintended loitering.

The definition of the side of parks not enclosed by built form will need to be addressed in detail design – to ensure that view lines to remote parts of public parks are maintained from the surrounding apartments, or else to control access (such as keyholders gates, as above) for communal open space.

Increased height adjacent to the light rail corridor also increases the passive surveillance (deterrence) for the wide reserve. As a practical matter, however, upper storeys beyond 6 storeys are unlikely to provide effective surveillance of spaces, and the perimeter block configuration adopted in the concept plan is favoured for this reason.

Overall, the strong relationship of buildings to public open space and streets combined with the number of apartments and the existence of two strong nodes (the proposed light rail station, and the shopping centre), as shown in **Attachment D**, all create a good environment for passive surveillance.

Access Control – Generally, access to basement car parks, loading zones and service passages should all be controlled – usually using security swipe cards or remote controls. Additional surveillance such as cameras can be incorporated into the security plan for the complex, although these should not be solely relied on. The location of access control points that appear appropriate to the concept plan and proposal are shown in **Attachments D and E**. The access control regime should be dealt with at detail design stage, such as an integrated security plan prepared on behalf of the strata management. Note our comments above regarding keyholder access to private and communal open space.

Activity Support –The degree of cross-movement likely to be fostered by the proposed light rail station and shopping centre are cumulatively likely to make the McGill Street Precinct a highly active centre during the day and night. Location of BBQs, seating groups and other sociopetal facilities in common open space may enhance activity on weekends – particularly along the W-E spine, although the locations are best nominated at detailed landscape design.

Application of CPTED principles to the public domain plan is shown at **Attachment D**. Analysis of the site-specific proposal is also shown at **Attachment E**, incorporating the suggested treatments above.

Bulk and Massing

The distribution of building bulk and massing is consistent with the McGill Street Precinct Master Plan and is sensitive to surrounding patterns of bulk and massing. Predominantly four storey building heights along the site's Old Canterbury Road frontage facilitates appropriate design responses to the adjoining 'ResA2 Lewisham Area' to the east, which is characterised by one and two storey detached residential housing. The massing of buildings addressing Old Canterbury Road is proposed to be stepped back on the upper two storeys, which provides an appropriate interface with the low density residential areas to the east. The location of taller building elements (eight to nine storeys) is more appropriately concentrated along the railway corridor/greenway to the west, adjacent to proposed open space areas within the site, and away from low density residential areas to the east. Buildings between taller developments and lower scaled buildings along the Old Canterbury Road frontage provides a transition in height through an intermediate scale of development at six storeys.

Careful consideration should be taken at the concept design stage to advocate well articulated building forms and modulated façades. This will assist to reduce the appearance of building bulk through measures such as appropriate solid to void ratios, balanced vertical and horizontal fenestration detailing, and adopting a general tripartite design through the articulation of a base/podium element, mid portion and setback upper building elements.

The massing of buildings is also confined to small footprints, to prevent extensive building lengths that would have detrimental visual impacts and would also be inconsistent with the built form character of the area. Appropriate building footprints also retain local view corridors, by providing breaks in the street wall along Old Canterbury Road to reinforce visual links from Toothill Street, Toothill Lane and Henry Street to the site. The building orientations and heights also demonstrate a good balance between urban definition and overshadowing, with acceptable shadow impact on neighbours, and good solar access within the precinct to both the buildings and major open spaces even in midwinter.

10 Conclusion

Urbis supports this proposal, as providing an appropriate response to the site and context and appropriately responds to its location proximate to major transport corridors, open space and local centres. The concept plan represents a logical refinement of the McGill Street Master Plan, and takes into account the three key objectives in that plan. Further analysis and subsequent investigations support the points of departure of the concept plan from the McGill Street Master Plan, and the key elements of the proposed plan relate to sound urban design considerations, which are likely to underpin a good built form outcome in detailed design.

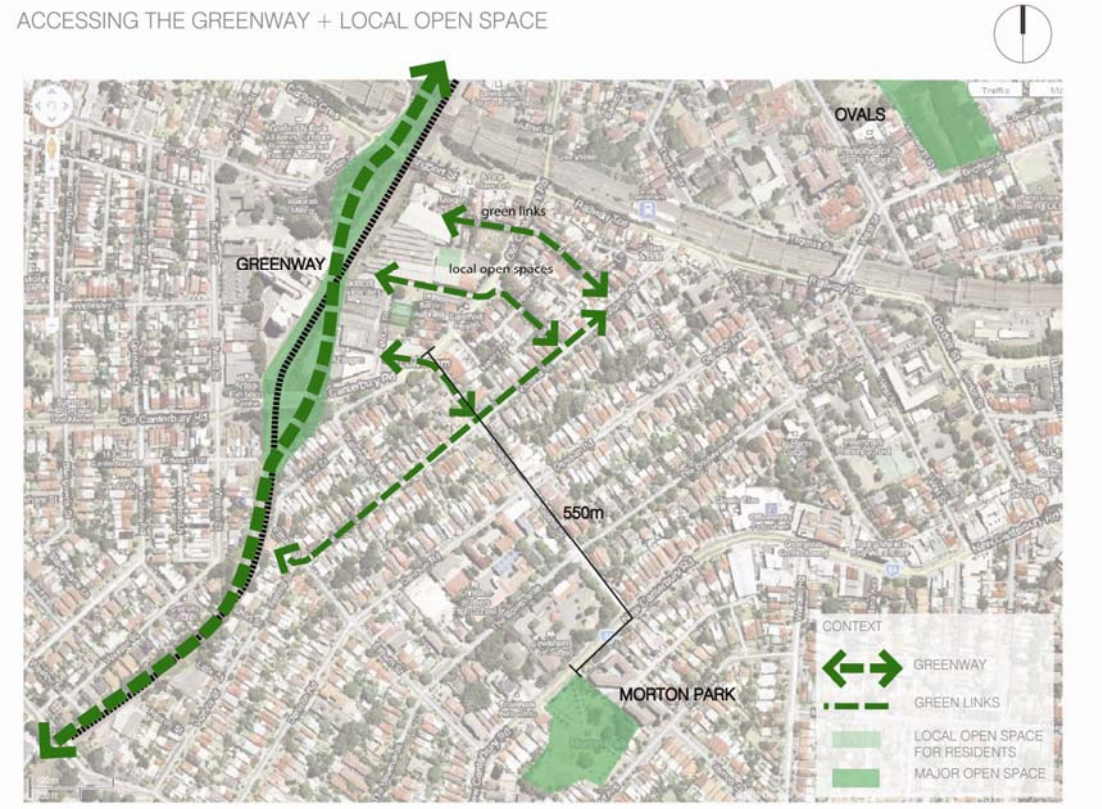
Please do not hesitate to contact me on (02) 8233 9900 if you have any queries.

Yours sincerely,

Marc Lane
Senior Consultant – Design

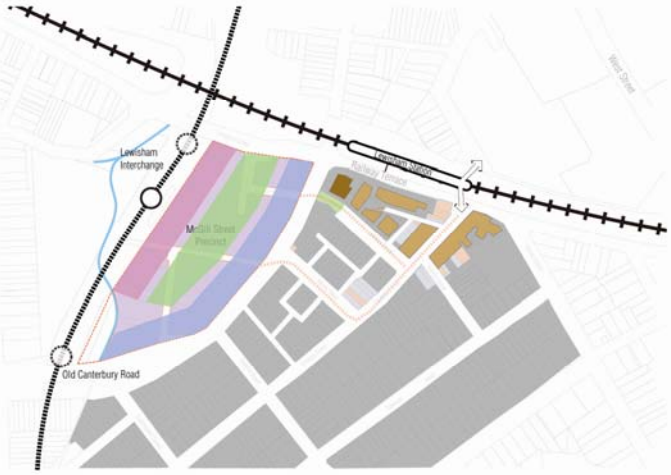
Attachment A – Existing and Future Context

Attachment B – Connectivity

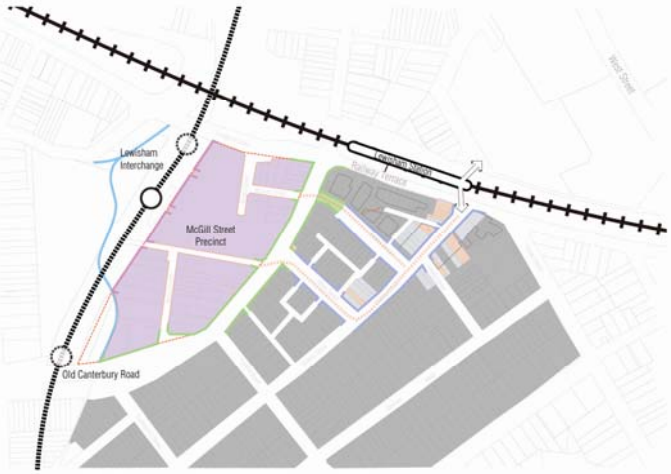


Attachment C – Height Strategies

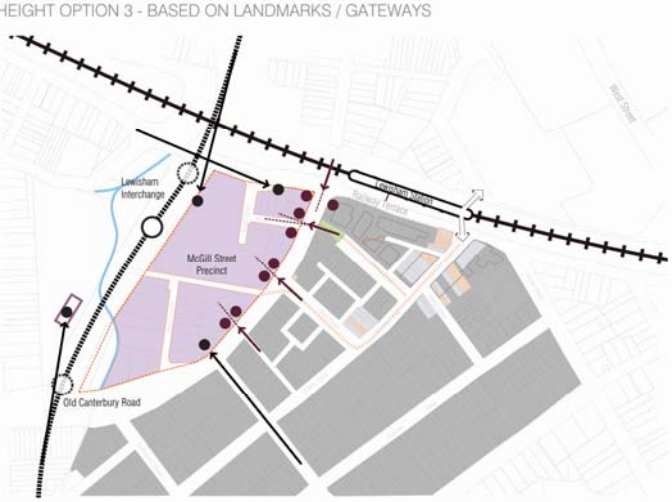
HEIGHT OPTION 1 - BASED ON OLSSEN STUDY



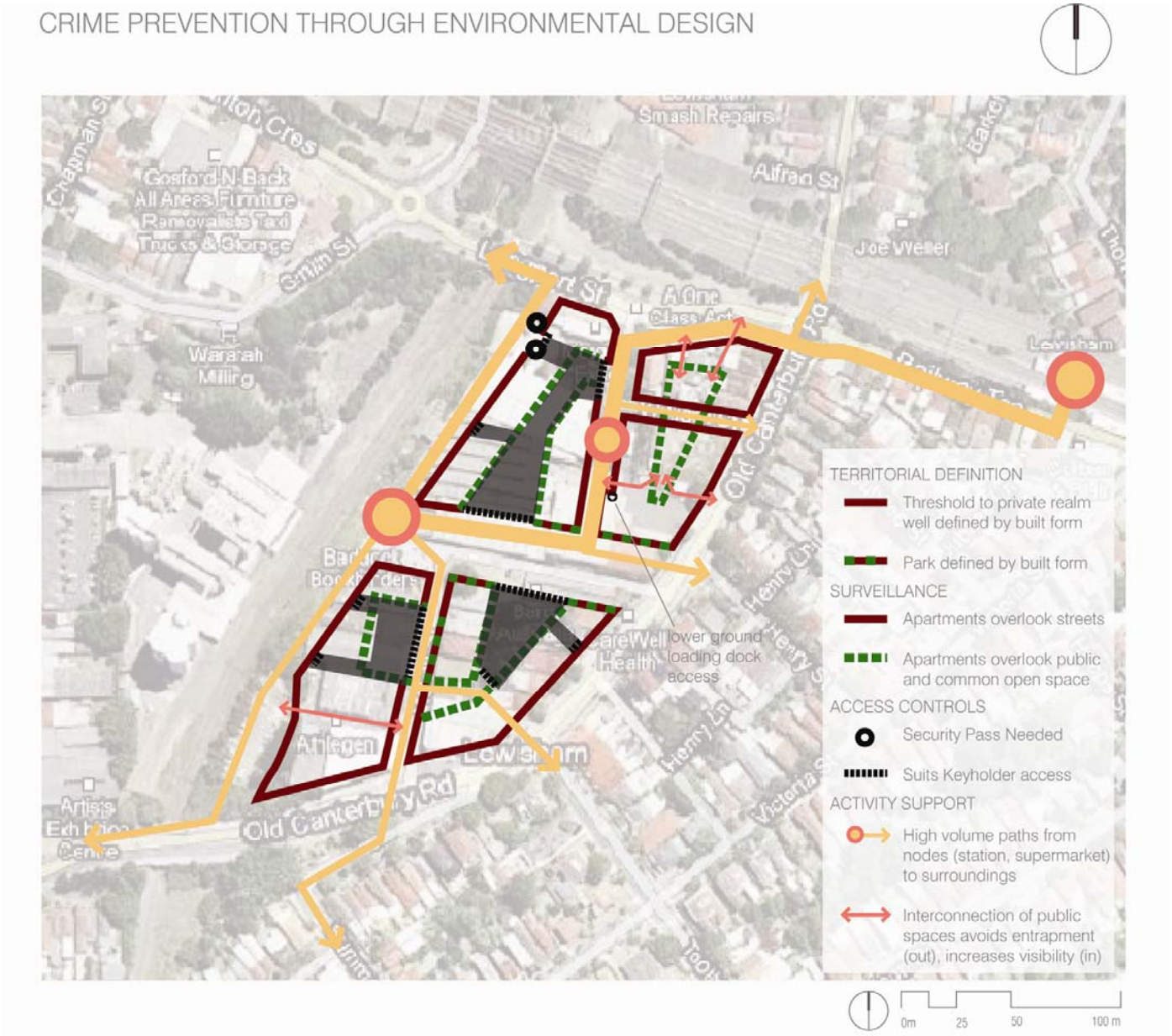
HEIGHT OPTION 2 - BASED ON MAJOR STREETS / WAYS



HEIGHT OPTION 3 - BASED ON LANDMARKS / GATEWAYS



Attachment D – Public Domain Plan



Attachment E – Analysis of Floor Plans