



14 September 2011

Sam Haddad
Director General
Department of Planning & Infrastructure
23-33 Bridge Street
SYDNEY NSW 2000

Attention: Ms Jodie Leeds

Dear Ms Leeds

**MP10_0112 & MP10_0113 – Proposed Concept Plan and Stage 1 Project Application
Stamford Grand Hotel Site, 110-114 Herring Road, Macquarie Park**

Introduction

We appreciate the opportunity to comment on the above applications in respect to the redevelopment of the Stamford Grand Hotel site.

AMP Capital Investors (AMPCI) represents the co-owners of the Macquarie Shopping Centre. Macquarie Centre is a major regional shopping centre located approximately 700 metres from the subject site and has significant potential for further growth as part of the University Station Activity Precinct. AMPCI has prepared this submission given the significance of the proposal and the potential to impact on planning objectives for the Macquarie Park Precinct.

Summary of Submission

AMPCI supports in principle the redevelopment of the Stamford Grand Hotel site reflecting the evolution and growth of the precinct. However, as outlined below, there are some aspects of the proposal that we draw to your attention for amendment and independent critique to ensure the optimal development outcome for this important site :

- The proposed development fails to provide adequate setbacks to Herring Road and Epping Road that will allow provision for the potential for future road widening at this important intersection as well as ensure that the building forms proposed will sit comfortably within the streetscape.
- Development contributions in excess of section 94 contributions should be made a condition of approval to support broader public transport and public domain objectives for the precinct.
- The provision of non-residential floor space and specifically retail floor space is potentially inappropriate given the location near to Macquarie Centre, the 'activity hub' of The University Station Precinct some 700 metres to the north.
- The design of the development should be independently reviewed to ensure design excellence given the significant built form scale proposed and the 'gateway' location into the precinct.
- The traffic analysis should be independently peer reviewed to test the traffic impacts of the development and the overall cumulative traffic impact.

These matters are outlined in more detail as follows.

Front Building Setbacks

It is our view that the proposed setbacks are inadequate to both Herring Road and Epping Road for the following reasons:

- The proposed setback to Epping Road fails to take into account the likelihood of the RTA acquiring land along this frontage as part of a planned future road upgrade. The application has been finalised without feedback and direction from the RTA whose approval to the proposal should be sought to remove concerns about future adequacy of the proposed arrangements.
- The proposed setback to Epping Road is 10 metres, which while consistent with the DCP does not leave any tolerance for the potential of the road widening works in the future.
- The proposed setback to Herring Road is only 5 metres which is inconsistent with the 10 metre requirement under the DCP. We note the Morling College Concept Plan Approval just to the north of the site maintains a predominant frontage setback to Herring Road of 10 metres.
- The 10 metre setback requirements in the DCP were established on the expectation of lower building heights (typically 6-8 storeys) compared to the 15 to 22 storeys proposed at the Herring and Epping Road corner. Accordingly, if building heights are to exceed those within the LEP (such as the Morling College site) greater building setbacks are necessary to ensure that these buildings will create a positive and visually attractive gateway into the precinct. The proposed 15 storey building with only a 5 metre front setback to Herring Road is likely to create a strong and potentially overwhelming urban form on this corner which is out of keeping with the broader design intent for Macquarie Park.

Contributions to the Public Domain for Additional FSR/Height

The proposed development seeks a significant increase in development yield but does not contemplate making a commensurate financial contribution in return for this uplift. If a significant increase in FSR is to be supported it must be accompanied by a commensurate development contributions 'package' (ie, in addition to Section 94 contributions) that addresses some of the pressing infrastructure needs in the precinct including:

- Contributions to the upgrading of the bus interchange adjacent to Macquarie Centre;
- Public domain improvements as per Council's Public Domain Strategy for Macquarie Park;
- Contributions to the upgrading of critical intersection improvements in the precinct.

Non-Residential Floor Space

While the proposal predominantly represents a residential scheme, the Concept Plan proposes a minimum of 1,110 sqm of non-residential floor space as part of the vision to create an "activity hub around the eastern corner of site close to Herring Road" [refer to EA page 29 by JBA].

The Concept Plan submission lacks any detail or clarity regarding the likely nature of retail services proposed for the site including the final quantum of retail floor space.

The proposal is for a minimum quantum of non-residential space meaning that there is no specified upper limit on retail floor space that may be pursued as part of a further Stage 2 development application.

It is our contention that the creation of an "activity hub" is not appropriate in this location and will dilute the designated activity node established by Macquarie Centre, the University and the associated transport infrastructure located within the Macquarie University Station Precinct located some 700 metres to the north. We stress that this concern is not about retail competition with Macquarie Centre but seeking to reinforce a single activity retail hub for the local precinct. By seeking to create a further activity hub on the subject site, it runs the risk of diluting from the activity in the main designated centre.

In order to reinforce the primacy of Macquarie Centre and the University Station Precinct as the "activity hub", retailing on the site should be limited to convenience based only with a recommended floor space

area of less than 1,000sqm, excluding other non-residential uses such as a cafe or other quasi commercial activities such as child care that may otherwise be suitable as part of the residential development.

Design Excellence

The subject site is identified by the proponent as the 'gateway' into Macquarie Park and accordingly, a landmark built form scale is proposed.

If significant buildings are to be contemplated for the site, it is a necessity to ensure that such development, and particularly the 15 and 22 storey buildings marking the corner of Herring and Epping Roads, demonstrate design excellence. The concern raised earlier in this submission regarding the adequacy of the front setbacks relative to the building height is a case in point.

While we acknowledge that the applicant has undertaken a peer review of the architectural design, we submit that a more robust independent design review process should be commissioned by the Department. This design review panel should be established to critically review the design and ensure design excellence is assured on such a significant corner site.

Peer Review of Traffic Modelling

Given the significant traffic issues being encountered within the Macquarie Park Precinct and the significant floor space proposed, we request that the Department commission an independent peer review of the traffic modelling to:

- Verify the traffic volumes modelled for the development;
- Determine the cumulative impact of the proposal on the road network and;
- Make recommendations as to the relative contributions that such a development should make to the upgrading of critical intersections.

Conclusion

We trust that the Department will carefully consider the matters raised in this submission.

If you have any questions or wish to discuss the matter further please do not hesitate to contact the undersigned on 9257 1808.

Yours sincerely



Jeff Peers
Divisional Development Manager
AMP Capital Investors