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14 September 2011

Mr 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

Thank you for the opportunity to comment on the above applications in respect to the redevelopment of the Stamford Grand Hotel site.

Macquarie University as a major stakeholder within Macquarie Park takes great interest in such significant proposals and seeks to ensure that such developments are consistent with and will further progress planning objectives for the Macquarie Park Precinct as a whole. As the Department would be aware, the University has a Concept Plan approval that allows for significant development across the campus including 400,000sqm of commercial floor space, 61,200sqm of academic space and 3,450 student housing beds.

Summary of Submission

The University is supportive in principle for the redevelopment of the Stamford Grand site, recognising that this area is undergoing significant change and will continue to do so for the years to come. There are however, a number of important aspects of the proposed development that warrant further consideration and ultimately amendment before the proposal can be considered capable of approval.

Specifically, it is the University's position that:

- The general height and FSR of the proposed development is supported in principle, recognising that the current Ryde LEP framework for the Herring Road precinct does not reflect the current and future potential of this area.



- 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 significant building forms proposed will sit comfortably within the streetscape.
- Given the significant quantum of floor space (over 56,000sqm) proposed, it is essential that appropriate financial contributions are provided as part of managing the cumulative traffic impact of development and the forecast need for the upgrading of major intersections.
- Given that the proposed development significantly exceeds the currently permitted FSR for the site, additional contributions beyond section 94 contributions should be made to support broader public transport and public domain objectives for the precinct.
- The proposed development should provide adequate car parking for future residents at least in accordance with the Ryde DCP given the already congested and constrained street system.
- The provision of non-residential floor space and specifically retail floor space is excessive and inappropriate given the location near to the 'activity hub' of The University Station Precinct some 700 metres to the north. The provision of retailing at this location would also potentially compromise pedestrian safety.
- 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

The proposed development provides for significant building forms well beyond the scale envisaged in the RLEP. If such building heights are to be supported it is essential that adequate front setbacks are provided commensurate with those building heights. 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 which raises considerable doubt and uncertainty about the adequacy of this proposed arrangement.
- 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 such building heights are to be supported 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 very strong and arguably overwhelming urban form on this corner which is out of keeping with the broader design intent for Macquarie Park.

'Pro-Rata' Contributions towards Upgrading of Intersections

The Environmental Assessment states that the forecast increase in traffic volumes generated by the development can be accommodated within the existing road network and therefore no road improvements are considered necessary to support the development. This approach however, fails to acknowledge the cumulative impacts of the additional development on the road network and identified critical intersections.

As part of the University's Concept Plan approval, it is obliged to enter into an agreement with the RTA to contribute towards the upgrading of a number of intersections. It is our position that the proponent should equally be required to contribute to relevant critical intersection improvements such as Herring Road and Epping Road and at least make a 'pro-rata' contribution reflecting the additional traffic generation increases modelled. (Refer also to "Peer Review of Traffic Modelling" set out below).

Contributions to the Public Domain for Additional FSR/Height

The proposal represents a very substantial development 'uplift' compared to that currently allowed in the LEP. Specifically, the proposal represents a 150% increase in the permitted FSR (being 1:1) compared to the proposed FSR of just over 2.5:1). The applicant draws upon previous draft LEP amendments (specifically Amendment No.1) as a basis for this increased FSR, although this draft amendment only proposed to permit 2:1 FSR for the subject land and was subject to the payment of contributions to the public domain on a \$ rate per sqm for the additional FSR realised.

The proposed development is seeking a significant increase in development yield but is not making a commensurate financial contribution in return for this significant uplift. It is our submission that if such a significant increase in FSR is to be supported it must be accompanied by a commensurate development contributions 'package' 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.

Such contributions are above the payment of standard section 94 contributions.



Provision of Car Parking

The proposed development is to provide a rate of parking for the residential apartments below the standards required under the Ryde DCP. The two areas of under provision are:

- For the 2 bedroom apartments, where only 1 space per unit is proposed compared to the DCP rate of 1.2 spaces per unit;
- For visitor parking, where only 1 space per 6 units is proposed compared to the DCP rate of 1 space per 4 units.

The applicant has not made a clear case for the reduction in these standards. The suggestion in the traffic report accompanying the EA that the rate for 2 bedroom units reflects the 'market' has no supporting evidence and fails to ignore the high demand for on-street parking in the locality. Similarly, the basis for a reduction in the rate of visitor parking given the extent of 'public parking' in the locality is without reasonable foundation. There are no public parking facilities in the vicinity of the site other than reliance on on-street parking.

It is our submission that parking pressure in the locality is already significant and unless adequate provision is made on-site in accordance with the DCP, the proposed development will create a 'knock on' effect further along Herring Road towards the University, as well as on other surrounding streets, including those in the residential areas of 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].

It is our submission that the creation of an "activity hub" in this location is not appropriate and will detract from the designated activity node of the Macquarie University Station Precinct located some 700 metres to the north. Furthermore, we question the suitability and safety of the site to become an "activity hub" on the frontage to Herring Road close to the intersection of Epping Road which is highly trafficked and congested.

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 submission that in order to re-inforce the primacy of the University Station Precinct and to avoid compromising pedestrian safety, retailing on the site should be limited to minimal convenience based only with a recommended floor space area of no greater than 100sqm. This would of course exclude other non-residential uses such as a café 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. As identified earlier, this is a built form scale well beyond that envisaged by the current or future planning controls.

If such significant buildings are to be contemplated for the site, it is a necessity to ensure that such developments and particularly the 15 and 22 storey buildings marking the corner of Herring and Epping Roads exhibit the highest 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 9850 1367.

Yours sincerely

Gavin D M Carrier
Director of Strategy, Planning and Development
Macquarie University Property