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Our ref: 218.099

Chris Shinn
Coordinator Strategic Planning | Strategic Land Use Planning
City Strategic Planning
Fairfield City Council
PO Box 21
FAIRFIELD NSW 1860



VIA EMAIL: CSHINN@FAIRFIELDCITY.NSW.GOV.AU

SUBJECT: URBAN DESIGN REVIEW OF PLANNING PROPOSAL FOR CABRAMATTA TOWN CENTRE, EAST PRECINCT

Dear Chris,

This advice has been prepared by TPG Town Planning and Urban Design (TPG) in relation to the Planning Proposal (PP) dated March 2018 prepared by GLN Planning currently under consideration by Fairfield City Council (Council) for a large strategic site adjacent to Cabramatta Railway Station. The site is located within the Cabramatta East precinct of the Cabramatta Town Centre.

The purpose of this correspondence is to provide an urban design assessment of the intended built form expected to result from the proposed amendments to the Fairfield Local Environmental Plan 2012 (FLEP 2013) as outlined in the indicative concepts prepared by Plus Architecture.

1. Background

The PP applies to a precinct of land bound by Fisher Street, Broomfield Street and Cabramatta Road East. The total area of the precinct included within the Planning Proposal is 1.54ha. As per advice provided by Council, the site consists of a southern (Site A) and northern precinct (Site B) as illustrated in Figure 1:

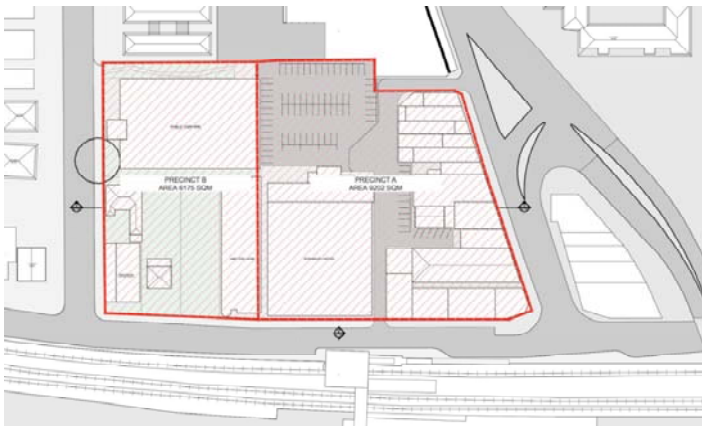


Figure 1: Subject site (Source GLN Planning)

The PP seeks an amendment to existing building height of buildings and floor space ratio (FSR) controls applicable to the subject site as follows:

	Current	Proposed
Minimum Site Area	Area A	2,200m ²
Land Use Zoning (LZN)	B4 Mixed Use	B4 Mixed Use (no change)
Height of Building (HOB) Site A (Southern Portion)	14m	45m
Height of Building (HOB) Site B (Northern Portion)	14m	72m
Floor Space Ratio (FSR) Site A (Southern Portion)	2:1	3.15:1
Floor Space Ratio (FSR) Site B (Northern Portion)	2:1	5.2:1

The PP would enable the development of some 620 dwellings and a considerable area of non-residential floor space providing for retail, commercial medical, and food and beverage oriented land uses.

1.1. Supporting information considered in this assessment

The following technical information in support the PP has been provided to TPG:

- Planning Proposal Request prepared by GLN Planning.
- Indicative Development Concept prepared by Plus Architecture dated 4 August 2017.
- Updated Feasibility prepared by Plus Architecture dated 12 February 2018 outlining a potential design response under a retained car park scenario.
- GLN Planning correspondence to Council dated 14 February 2018 regarding inclusion of Council's car park land and VPA offer for replacement and provision of additional car parking as well as the provision of an overhead pedestrian connection to the railway station.

1.2. Consistency of information provided in the PP

There a number of instances communicating the intended outcomes of the PP. These are outcomes in the following table:

Development controls proposed to be amended	Table on Page 13 of PP	PP Section 3 - Objectives or Intended Outcomes	PP Part 4 - Mapping
HOB (Site A)	64.7m	71.7m	66m
HOB (Site B)	33.5m	43.6m	46m
FSR (Site A)	4.35:1 (average)	5.26:1	5.2:1
FSR (Site B)	4.35:1 (average)	3:1	3.15:1

As indicated in the table above, there are a number of inconsistencies in the information provided by the applicant. Clarification will be necessary to confirm the specific nature of the requested amendments to the existing planning controls.

1.3. Design Options

The PP is supported by indicative development plans prepared by Plus Architecture. Two design options have been provided, which consider the potential demolition (Option A) or retention (Option B) of the existing Fisher Street car park.

2. Strategic Considerations

2.1. A Metropolis of Three Cities - the Greater Sydney Region Plan

A Metropolis of Three Cities - the Greater Sydney Region Plan aims to rebalance growth and deliver its benefits more equally and equitably to residents across Greater Sydney.

- **Objective 7:** Communities are healthy, resilient and socially connected

Strategy 7.1: Deliver healthy, safe and inclusive places for people of all ages and abilities that support active, resilient and socially connected communities by:

- providing walkable places at a human scale with active street life
 - prioritising opportunities for people to walk, cycle and use public transport
 - co-locating schools, health, aged care, sporting and cultural facilities
 - promoting local access to healthy fresh food and supporting local fresh food production.
- **Objective 10:** Greater housing supply.
 - **Objective 11:** Housing is more diverse and affordable.
 - **Objective 12:** Great places that bring people together.

The Plan sets a 20-year strategic housing target between 2016-2036 of some 184,500 new dwellings, which is second only to the target for the Central City.

The Plan is generally supportive of urban renewal and intensification of centres adjacent to metropolitan railway stations.

2.1. Western City District Plan

The Western City District Plan provides a 20-year plan to manage growth, while enhancing Greater Sydney's liveability, productivity and sustainability. It is a guide for implementing *A Metropolis of Three Cities - the Greater Sydney Region Plan* at a District level and is a bridge between regional and local planning.

The Plan recognises Cabramatta as a vibrant and multicultural destination with a distinctive night time economy. Relevant priorities of the plan applicable to Cabramatta Town Centre include:

- **Planning Priority W4** Fostering healthy, creative, culturally rich and socially connected communities
- **Planning Priority W5** Providing housing supply, choice and affordability, with access to jobs, services and public transport
- **Planning Priority W6** Creating and renewing great places and local centres, and respecting the District's heritage.

The District Plan generally advocates for urban renewal and intensification of centres adjacent to metropolitan railway stations such as Cabramatta.

2.2. Draft Fairfield Residential Development Strategy 2009 - 6.2 Cabramatta

The draft Fairfield Residential Development 2009 (RDS) provides the framework to accommodate a dwellings target of 24,000 dwellings in the Fairfield LGA by 2031. The Strategy recommends the following relevant directions for Cabramatta:

- Increase dwelling stock to support the role of Cabramatta as a Town Centre.
- Long term opportunity to increase scale and density within town centre.
- Provide additional open space in across the catchment to support increased housing density.
- Prioritise development in areas not impacted by environmental constraints.
- Provide additional community facilities in line with the needs of current and future population.
- Upgrade quality of public domain and provide additional open space for public meeting and gathering.
- Ensure future dwellings are constructed to the standards of SEPP 65 and are accessibility criteria.

The RDS also provides for the following Structure Plan Principles relevant to the Cabramatta Town Centre and east side of the railway line:

- Existing controls do not allow for additional residential uses in the town centre. Support draft DCP which enables residential development 2 storeys and above to a maximum of 9 storeys.
- Support draft planning controls which permit high density. Strata has limited short-medium term renewal. Potential for high density in long term. Height outside commercial core should be restricted to ensure visual and physical dominance of the commercial core in the urban landscape.
- Support renewal to enhance gateway to centre, at high density in the short term. (notation refers to land adjacent to the approach to Cabramatta Town Centre from the east).
- Additional high density areas in the short term (notation refers to area immediately north of the subject site).
- Additional linkages to ease permeability of town centre in the short term (notation refers to Cabramatta Town Centre East Precinct).

It is understood that implementation of the RDS for Cabramatta (i.e. preparation of an Urban Renewal Master Plan) is deferred pending investigation of local road and traffic issues.

The RDS is generally supportive of increased density in the Cabramatta Town Centre as a medium to long term strategy, however it does not provide a specific form indicating how this may be achieved.

3. Urban Design and Strategic Planning Assessment of the PP and Supporting Documentation

This urban design assessment considers the urban design and strategic planning merit of the proposed built form concept options provided in support of the PP for the subject site. The assessment will primarily consider the merits of Option 1, which constitutes a whole of site

proposal. Any specific matters pertaining to the Option 2 variation will be discussed subsequent to each section as necessary.

TPG notes that a PP does not seek approval for an actual development or built form. At this stage of the planning process, any architectural plans can only be considered as indicative of a built form that may be achieved through application of the proposed development controls. However, for a site of this nature the particular relationship between development controls and the ability to achieve a future built form outcome that based on sound urban design principles, embodies a tangible public benefit and which is capable of achieving compliance with SEPP 65/ ADG.

It is important to ensure that the site planning principles and proposed massing are achievable with acceptable and manageable impacts. Development staging is a critical consideration to ensure the functionality of the precinct noting potential for the Fisher Street car park to be retained in the short to medium term.

3.1. Consistency with SEPP 65 Design Quality Principles

3.1.1. Option 1

The indicative floor plans and architectural massing for Option 1 have been considered based on the core elements of the Apartment Design Guide (ADG).

The following table outlines consistencies have been identified and where more information is required to enable assessment of the PP to be undertaken.

Schedule 1 Design Quality Principles	Response
<p>Principle 1: Context and Neighbourhood Character</p> <p>Good design responds and contributes to its context. Context is the key natural and built features of an area, their relationship and the character they create when combined. It also includes social, economic, health and environmental conditions.</p> <p>Responding to context involves identifying the desirable elements of an area's existing or future character. Well designed buildings respond to and enhance the qualities and identity of the area including the adjacent sites, streetscape and neighbourhood. Consideration of local context is important for all sites, including sites in established areas, those undergoing change or identified for change.</p>	<ul style="list-style-type: none"> Will provide a new landmark destination on the opposite side of the railway line to the main activity centre of Cabramatta. The ground floor site planning enhances permeability and creates a new public space, which are essential elements in a Transit Oriented Development (TOD) location with high pedestrian volume. Generally consistent with state government aim to intensify railway based centres with higher density mixed use development. A retail interface at ground level will assist in defining the character at the street edge and proposed market square and enhancing the amenity of the street and public realm. <p>Recommendations</p> <ul style="list-style-type: none"> Market square and proposed nominated open air links should remain open to the public in perpetuity. It would be beneficial for a site specific DCP to be prepared and exhibited with the PP to guide specific design outcomes including the arrangement of through-site links/ public open space elements and ground level activation.

Schedule 1 Design Quality Principles	Response
<p>Principle 2: Built Form and Scale</p> <p>Good design achieves a scale, bulk and height appropriate to the existing or desired future character of the street and surrounding buildings.</p> <p>Good design also achieves an appropriate built form for a site and the building's purpose in terms of building alignments, proportions, building type, articulation and the manipulation of building elements. Appropriate built form defines the public domain, contributes to the character of streetscapes and parks, including their views and vistas, and provides internal amenity and outlook.</p>	<ul style="list-style-type: none"> • Increased scale in the Cabramatta Town Centre location adjacent to the railway station is appropriate provided impacts (e.g solar access) can be appropriately managed. • The Indicative Design Concept exceeds the existing scale of the Cabramatta Town Centre, however it is noted that the site is adjacent to major railway infrastructure and has potential to promote public transport useage. • Takes advantage of the expansive Cabramata Road East road reserve to the south of the site to 'absorb' overshadowing, however does overshadow private properties to the south where residential uses are permissible (Further assessment/ recommendations provided below). • The development concept prepared by Plus Architecture demonstrates that an articulated built form can be achieved to reflect the human scale at the street edge by reinforcing visual qualities of lower levels and promoting 'lighter weight' and set back construction of upper levels supported by increasing setbacks to the street edge on upper levels. • Larger floor to floor heights on ground levels are appropriate to accommodate non-residential uses. <p>Recommendations</p> <ul style="list-style-type: none"> • It would be beneficial for a site specific DCP to be prepared and exhibited with the PP to guide specific design outcomes including the arrangement of podium height, upper level setbacks and floor to floor heights for ground level non-residential uses.

Schedule 1 Design Quality Principles	Response
<p>Principle 3: Density</p> <p>Good design achieves a high level of amenity for residents and each apartment, resulting in a density appropriate to the site and its context.</p> <p>Appropriate densities are consistent with the area's existing or projected population. Appropriate densities can be sustained by existing or proposed infrastructure, public transport, access to jobs, community facilities and the environment.</p>	<ul style="list-style-type: none"> • The indicative development concept provides for increased housing and business opportunities in an area where it is most appropriate, with convenient access to public transport and local retail and community facilities. • The FSR and height responds the emerging future scale of the Cabramatta Town Centre. • The Cabramatta Town Centre is a vibrant centre providing potential for a higher residential and employment population in a high amenity and accessible location. • The envisaged density is significantly greater than that already provided for within the centre. It is noted that the regional strategic planning documents supporting such densities in the Cabramatta Town Centre is high level at present. <p>Recommendations</p> <ul style="list-style-type: none"> • Generally consistent with State and Regional Planning Policy.
<p>Principle 4: Sustainability</p> <p>Good design combines positive environmental, social and economic outcomes. Good sustainable design includes use of natural cross ventilation and sunlight for the amenity and liveability of residents and passive thermal design for ventilation, heating and cooling reducing reliance on technology and operation costs. Other elements include recycling and reuse of materials and waste, use of sustainable materials, and deep soil zones for groundwater recharge and vegetation.</p>	<ul style="list-style-type: none"> • Intensification near the Cabramatta train station will reduce reliance on private vehicles and encourage public transport use. • The proposal will increase residential and commercial opportunities in an area of high amenity encouraging walking instead of driving. • Deep soil zones are not provided for. Noting the ADG allows for discretion in CBD locations. <p>Recommendations</p> <ul style="list-style-type: none"> • Sustainability measures and be further addressed at detailed design stage.

Schedule 1 Design Quality Principles	Response
<p>Principle 5: Landscape</p> <p>Good design recognises that together landscape and buildings operate as an integrated and sustainable system, resulting in attractive developments with good amenity. A positive image and contextual fit of well designed developments is achieved by contributing to the landscape character of the streetscape and neighbourhood.</p> <p>Good landscape design enhances the development's environmental performance by retaining positive natural features which contribute to the local context, co-ordinating water and soil management, solar access, micro-climate, tree canopy, habitat values, and preserving green networks. Good landscape design optimises usability, privacy and opportunities for social interaction, equitable access, respect for neighbours' amenity, provides for practical establishment and long term management.</p>	<ul style="list-style-type: none"> • The PP will assist in realising the potential for the site to become a more pedestrian and cycling friendly place, with greater legibility for pedestrians. • Utilising parts of the podium roof as communal open space offers potential to soften the building edge with visible landscaping above the parapet line. • As indicated in section drawings, a future canopy above the footpath will provide for climate control and protection for shops and pedestrians along with place making opportunities for alfresco dining and street merchandising. • While deep soil zones have not been proposed, there is a significant public benefit in creating a new public square. As the precinct is intended to be retail focused, harder landscaping character is appropriate. <p>Recommendations</p> <ul style="list-style-type: none"> • As indicated on the concept plan, box planters and street furnishings and potentially public art elements should be included as a part of later detailed design stages to soften the visual aspects of the space. • Place making elements and streetscape may be provided for via a Voluntary Planning Agreement (VPA).

Schedule 1 Design Quality Principles	Response
<p>Principle 6: Amenity</p> <p>Good design positively influences internal and external amenity for residents and neighbours. Achieving good amenity contributes to positive living environments and resident well being.</p> <p>Good amenity combines appropriate room dimensions and shapes, access to sunlight, natural ventilation, outlook, visual and acoustic privacy, storage, indoor and outdoor space, efficient layouts and service areas, and ease of access for all age groups and degrees of mobility.</p>	<ul style="list-style-type: none"> • Solar access diagrams within the indicative development plan demonstrate that building bulk can be designed to ensure appropriate solar access to residential buildings to the south of the Cabramatta East Rd road reserve. • Solar access diagrams within the indicative development plan show a high level of impact to lots to the south of Cabramatta Road East (refer Section 3.2.1 below). • Solar access diagrams show a reasonable solar access to the proposed market square between the hours of 10am-2pm mid winter. • Mid winter solar access to the proposed market square would peak between lunchtime hours 11am and 1pm, when the daytime usage is likely to be the greatest. • The proposed towers are generally well oriented to allow for appropriate solar access, ventilation and outlook for all dwellings, however a schedule of ADG compliance has not been provided to confirm solar access and cross ventilation. <p>Recommendations</p> <ul style="list-style-type: none"> • Applicant should provide a schedule to confirm appropriate solar access and cross ventilation consistent with ADG Standards for solar access within proposed residential tower elements. • Further consideration of solar impacts required to developable land south of the site (refer Section 3.2.1 below).

Schedule 1 Design Quality Principles	Response
<p>Principle 7: Safety</p> <p>Good design optimises safety and security, within the development and the public domain. It provides for quality public and private spaces that are clearly defined and fit for the intended purpose. Opportunities to maximise passive surveillance of public and communal areas promote safety.</p> <p>A positive relationship between public and private spaces is achieved through clearly defined secure access points and well lit and visible areas that are easily maintained and appropriate to the location and purpose.</p>	<ul style="list-style-type: none"> Managing access in perpetuity to the market square and open air links requires special consideration to minimise opportunities for crime. Passive surveillance of surrounding streets and public market square and new links will be achieved through orientation of built form to maximise units and balconies overlooking the street. An active street front will assist in activation of the street during day and night time hours to promote surveillance and safety. Under awning lighting, lighting of the public market square and links may be provided for as a part of a future detailed design process. <p>Recommendations</p> <ul style="list-style-type: none"> A Crime Prevention Through Environmental Design (CPTED) report should be submitted with any future development application to confirm key strategy elements of managing access through the Market Square and key through-site links to minimise potential for crime. High level consideration for CPTED matters should be considered in the Indicative Development Plan and/or a DCP.
<p>Principle 8: Housing Diversity and Social Interaction</p> <p>Good design achieves a mix of apartment sizes, providing housing choice for different demographics, living needs and household budgets.</p> <p>Well designed apartment developments respond to social context by providing housing and facilities to suit the existing and future social mix. Good design involves practical and flexible features, including different types of communal spaces for a broad range of people, providing opportunities for social interaction amongst residents.</p>	<ul style="list-style-type: none"> The proposed form will enable a variety of apartment types to cater for a variety of budgets and needs in a high amenity location. Retail/commercial tenancies at ground and first floor level will provide greater lifestyle choice and convenience. Intensification of residential activity in the Cabramatta Town Centre will support local business enhancing viability and diversity of local amenities. The proposed market square will provide community gathering points to encourage social interaction at street level.

Schedule 1 Design Quality Principles	Response
<p>Principle 9: Aesthetics</p> <p>Good design achieves a built form that has good proportions and a balanced composition of elements, reflecting the internal layout and structure. Good design uses a variety of materials, colours and textures.</p> <p>The visual appearance of well designed apartment development responds to the existing or future local context, particularly desirable elements and repetitions of the streetscape.</p>	<ul style="list-style-type: none"> The indicative concepts demonstrate that an appropriate form and scale can be achieved on the site, consistent with the Town Centre location and the desired high density character of the Cabramatta East precinct as suggested by regional strategic planning documents and Draft RDS. Activated street frontage and a potential future redevelopment will provide a desirable aesthetic to a presently blighted area of Cabramatta Town Centre. The indicative form demonstrates that an appropriate relationship can be achieved between neighbouring forms through building setbacks. An appropriate detailed architectural response at as a part of a future development application will appropriately address the architectural quality of a future development as required by the ADG. It should be noted that the rezoning process provides limited certainty that the built form outcome represented in the indicative development plans (Plus Architecture) will be achieved exactly as represented. <p>Recommendations</p> <ul style="list-style-type: none"> A Crime Prevention Through Environmental Design (CPTED) report should be submitted with any future development application to confirm key strategy elements of managing access through the Market Square and key through-site links to minimise potential for crime. Considerations should be given to establishing DCP provisions to guide design quality. Consideration may be given to including design excellence provisions under the FLEP 2013 or DCP.

3.1.2. Option 2 Variance

Option 2 provides a variance to the Option 1 indicative built form plan, which seeks to demonstrate how the retention of the car park would be staged and managed on a site planning and massing level.

In comparing Option 1 and 2 plans it can be inferred that a discrete building module could be developed on the car park site at a future stage. Option 2 plans show a slightly altered ground floor arrangement, which relocates the arcade link westwards towards Broomfield Street. In the Option 2 plan, the applicant should demonstrate how the Fisher Street Car Park module could be developed as a discrete parcel ensuring all new links are sufficient activated through that site.

It is assumed that the retention of the Fisher Street Car Park would occur in a circumstance where it is not feasible to redevelop in the short term. In the event the car park is not developed in unison with the broader site area, it is likely to remain in situ for the long term as its redevelopment is largely contingent on a VPA for replacement and increased parking within the site offsite.

Retention of the car park would result in challenges integrating new public links via the inactive facades of the car park. Strategies for ensuring an appropriate visual quality of exposed car park facades and reducing opportunities for crime should be considered. Such matters may be further explored and confirmed post Gateway and prior to public exhibition of the PP or as part of a future detailed design and development application process.

As outlined above, in the context of the indicative development plans provided, retention of the car park is not a desirable outcome given the site efficiency, permeability and street and (new) laneway activation that can be achieved derived from a whole of site redevelopment.

3.2. Consistency with the Apartment Design Guide (ADG)

Whilst the objective of the design concept for the site was not to provide a detailed design or built form; overarching design matters outlined in the ADG such as height, setbacks and solar access are critical issues to be considered at the PP stage to ensure that an appropriate built form can be achieved prior to detailed design processes occurring.

3.2.1. Option 1

Table 2 provides an assessment of the indicative built form in accordance with key ADG Design Criteria.

Table 2 – ADG Compliance

Core requirements of SEPP 65/ ADG	Comment
<p>2E - Building Depth</p> <p>12 – 18m</p>	<p>No dimensions provided. It appears that building depth is approximately 22m. ADG does not set design criteria on building depth, however some cross through apartments indicated on the plans plan may be excessively long.</p> <p>Recommendation</p> <ul style="list-style-type: none"> • Schedules and solar analysis should demonstrate the proposed massing can achieve compliance with this requirement.

Core requirements of SEPP 65/ ADG	Comment												
<p>2F - Building Separation</p> <p>Up to four storeys (approximately 12m):</p> <ul style="list-style-type: none"> • 12m between habitable rooms/balconies • 9m between habitable and non-habitable rooms • 6m between non-habitable rooms <p>Five to eight storeys (approximately 25m):</p> <ul style="list-style-type: none"> • 18m between habitable rooms/balconies • 12m between habitable and non-habitable rooms • 9m between non-habitable rooms <p>Nine storeys and above (over 25m):</p> <ul style="list-style-type: none"> • 24m between habitable rooms/balconies • 18m between habitable and non-habitable rooms • 12m between non-habitable rooms 	<p>Building separation distance between each tower module is consistent with the ADG requirements.</p>												
<p>3D - Communal and Public Open Space</p> <p>Design criteria</p> <ol style="list-style-type: none"> 1. Communal open space has a minimum area equal to 25% of the site (see figure 3D.3) 2. Developments achieve a minimum of 50% direct sunlight to the principal usable part of the communal open space for a minimum of 2 hours between 9 am and 3 pm on 21 June (mid winter) 	<p>Insufficient detail to assess.</p> <p>Recommendation</p> <ul style="list-style-type: none"> • Schedules and solar analysis should demonstrate the proposed massing can achieve compliance with this requirement. 												
<p>3E - Deep Soil Zones</p> <p>Design criteria</p> <ol style="list-style-type: none"> 1. Deep soil zones are to meet the following minimum requirements: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Site area</th> <th>Minimum dimensions</th> <th>Deep soil zone (% of site area)</th> </tr> </thead> <tbody> <tr> <td>less than 650m²</td> <td>-</td> <td rowspan="4" style="text-align: center; vertical-align: middle;">7%</td> </tr> <tr> <td>650m² - 1,500m²</td> <td>3m</td> </tr> <tr> <td>greater than 1,500m²</td> <td>6m</td> </tr> <tr> <td>greater than 1,500m² with significant existing tree cover</td> <td>6m</td> </tr> </tbody> </table>	Site area	Minimum dimensions	Deep soil zone (% of site area)	less than 650m ²	-	7%	650m ² - 1,500m ²	3m	greater than 1,500m ²	6m	greater than 1,500m ² with significant existing tree cover	6m	<p>No deep soil provided for within indicative plans.</p> <p>Note that the ADG guidance notes provides flexibility for development in town centres where potential for deep soil is limited. In such circumstances, the guidance note recommends 'on-structure' planting. This can be achieved in the Market Square as indicated on concept.</p> <p>Given the town centre location and provision of a public open space in the form of a market square, the provision of a deep soil zone is considered unnecessary in this circumstance. This matter may be addressed at Council's discussion as part of future detailed design and development application processes.</p>
Site area	Minimum dimensions	Deep soil zone (% of site area)											
less than 650m ²	-	7%											
650m ² - 1,500m ²	3m												
greater than 1,500m ²	6m												
greater than 1,500m ² with significant existing tree cover	6m												
<p>3F - Visual Privacy</p> <p>Design criteria</p> <ol style="list-style-type: none"> 1. Separation between windows and balconies is provided to ensure visual privacy is achieved. Minimum required separation distances from buildings to the side and rear boundaries are as follows: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Building height</th> <th>Habitable rooms and balconies</th> <th>Non-habitable rooms</th> </tr> </thead> <tbody> <tr> <td>up to 12m (4 storeys)</td> <td>6m</td> <td>3m</td> </tr> <tr> <td>up to 25m (5-8 storeys)</td> <td>9m</td> <td>4.5m</td> </tr> <tr> <td>over 25m (9+ storeys)</td> <td>12m</td> <td>6m</td> </tr> </tbody> </table>	Building height	Habitable rooms and balconies	Non-habitable rooms	up to 12m (4 storeys)	6m	3m	up to 25m (5-8 storeys)	9m	4.5m	over 25m (9+ storeys)	12m	6m	<p>Building separation distance between each tower module is consistent with the ADG requirements.</p>
Building height	Habitable rooms and balconies	Non-habitable rooms											
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over 25m (9+ storeys)	12m	6m											

Core requirements of SEPP 65/ ADG	Comment
<p>4A Solar and Daylight Access</p> <p>Design criteria</p> <p>1. Living rooms and private open spaces of at least 70% of apartments in a building receive a minimum of 2 hours direct sunlight between 9 am and 3 pm at mid winter in the Sydney Metropolitan Area and in the Newcastle and Wollongong local government areas</p> <p>3. A maximum of 15% of apartments in a building receive no direct sunlight between 9 am and 3 pm at mid winter</p>	<p>Solar overshadowing (within site)</p> <ul style="list-style-type: none"> The proposed towers are generally well oriented to allow for appropriate solar access, ventilation and outlook for all dwellings, however a schedule of ADG compliance has not been provided to confirm solar access and cross ventilation. <p>Recommendations</p> <ul style="list-style-type: none"> Applicant should provide a schedule to confirm appropriate solar access and cross ventilation consistent with ADG Standards. <p>Solar overshadowing (external to site)</p> <ul style="list-style-type: none"> Solar access diagrams within the indicative development plan show a high level of impact to 126 Cabramatta Road East (Lot 1 in DP 567885 and Lots 8, 9, 10, 11 and 12 in DP 237675). This land is zoned for residential purposes. Solar access diagrams within the indicative development plan show a high level of impact to 144-156 Cabramatta Road East. This land is zoned B4 Mixed use, which permits the development of shop top housing and residential flat buildings purposes. <p>Recommendations</p> <ul style="list-style-type: none"> Further consideration of solar impacts on 126 Cabramatta Road East (Lot 1 in DP 567885 and Lots 8, 9, 10, 11 and 12 in DP 237675) necessary. Further consideration of solar impacts on 144-156 Cabramatta Road East necessary. For the above lots, investigation of vertical shadow impacts on a potential future built form scenario is recommended to ensure these lots can achieve appropriate solar access. Applicant to test increased setbacks to south eastern tower.

Core requirements of SEPP 65/ ADG	Comment												
<p>4B Natural Ventilation</p> <p>Design criteria</p> <p>1. At least 60% of apartments are naturally cross ventilated in the first nine storeys of the building. Apartments at ten storeys or greater are deemed to be cross ventilated only if any enclosure of the balconies at these levels allows adequate natural ventilation and cannot be fully enclosed</p> <p>2. Overall depth of a cross-over or cross-through apartment does not exceed 18m, measured glass line to glass line.</p>	<p>Insufficient detail to assess. Noting that the prevalence of corner and cross through apartments indicated on plans is favorable for cross ventilation compliance.</p> <p>Recommendation</p> <ul style="list-style-type: none"> • Schedules and indicative (typical) floor plans should demonstrate the proposed massing can achieve compliance with this requirement. 												
<p>4C Ceiling Heights</p> <p><i>Design criteria</i></p> <p>1. Measured from finished floor level to finished ceiling level, minimum ceiling heights are:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2" style="background-color: #cccccc;">Minimum ceiling height for apartment and mixed use buildings</th> </tr> </thead> <tbody> <tr> <td>Habitable rooms</td> <td>2.7m</td> </tr> <tr> <td>Non-habitable</td> <td>2.4m</td> </tr> <tr> <td>For 2 storey apartments</td> <td>2.7m for main living area floor 2.4m for second floor, where its area does not exceed 50% of the apartment area</td> </tr> <tr> <td>Attic spaces</td> <td>1.8m at edge of room with a 30 degree minimum ceiling slope</td> </tr> <tr> <td>If located in mixed used areas</td> <td>3.3m for ground and first floor to promote future flexibility of use</td> </tr> </tbody> </table> <p>These minimums do not preclude higher ceilings if desired</p>	Minimum ceiling height for apartment and mixed use buildings		Habitable rooms	2.7m	Non-habitable	2.4m	For 2 storey apartments	2.7m for main living area floor 2.4m for second floor, where its area does not exceed 50% of the apartment area	Attic spaces	1.8m at edge of room with a 30 degree minimum ceiling slope	If located in mixed used areas	3.3m for ground and first floor to promote future flexibility of use	<p>Cross sections provided to indicate floor to floor heights. 3.1m floor to floor height depicted for upper residential levels.</p> <p>Ground floor to floor height is 5.0m – 6.0m to accommodate ground level retail and Level 1 of 4.5m Commercial/ Hotel.</p> <p>Higher floor to floor heights for commercial and retail levels generally acceptable provided that overshadowing impacts of upper residential levels can be appropriately managed.</p> <p>Recommendation</p> <ul style="list-style-type: none"> • Note impacts of overall height on nearby properties to the south of the site.
Minimum ceiling height for apartment and mixed use buildings													
Habitable rooms	2.7m												
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3.2.2. Option 2 Variance

As per Option 1 assessment in [Section 3.2.1.](#)

3.3. Place Making

3.3.1. Option 1

The PP and accompanying indicative development plan is intended to facilitate a mixed use, shop top housing development in a high pedestrian traffic location adjacent to the Cabramatta railway station. At present, the majority of activity currently in the centre occurs west of the train station. Public open space in and around the Cabramatta Town Centre is limited, with the nearest parklands some 300m or more from the subject site. Public plaza spaces in the centre are limited the western side of the town centre with Freedom Plaza on Arthur Street and seating areas provided on widened footpaths along John Street, focused on the key activity/eat streets of Cabramatta.

As provided in the indicative development plans, the redevelopment of the subject site offers significant potential to enhance the place making qualities on the eastern side of the railway line and create a new destination and extension of the Cabramatta town centre ‘heart’. The proposal aims to achieve this by providing open air connections through the site via a new ‘market square’ to be activated with retail, food and beverage, community and commercial uses.

The PP as proposed will result in significant public benefits in that it will create a new destination on the eastern side of the railway station. The scale of development and the built form scale and quality of architectural presentation envisaged for the precinct has the potential to create a ‘beacon’ for the eastern side of the Cabramatta town centre, creating new pedestrian-oriented feel for a presently blighted and uninviting locality. As proposed by the applicant, the provision of increased public parking in this location will also assist in new

land uses and public places benefiting from the arrival points of both the train station and public car park.

In any mixed use area that provides for day and night time activity, consideration will be necessary at a future detailed design state to minimise potential for crime, propose safety and ensure appropriate maintenance is undertaken on the space. Matters such as land tenure, management, maintenance responsibilities and security will require further considerations at a detailed design stage.

Noting that at the rezoning stage of the planning process, consideration should be given to the type of mechanisms that may be utilised to ensure the delivery of the key public benefits proposed within the plan. For example, elements such as the Market Square and key open air links could potentially be delivered through a Voluntary Planning Agreement (VPA) in addition to the proposed replacement and increased public car parking. Council may also request that the applicant submit a site-specific DCP to guide the delivery of intended key public benefits. It is noted that a VPA and DCP may be used simultaneously.

3.3.1. Option 2 Variance

In addition to the above comments, under a scenario that retains the Fisher Street car park, it will be necessary to consider the interface between the site and the Fisher Street car park at detailed design stage. As these facades are presently inactive and likely to remain so under this scenario, the visual quality of exposed outward facing car park walls is a major consideration. It is recognised that, while preferred approach to activate the external walls with retail uses may not be feasible, opportunities such as green walls, public art, high quality cladding and lighting may assist in improving the quality of exposed active facades.

As previously discussed, such matters may be guided via a VPA or through establishing appropriate site specific DCP provisions.

3.4. Crime Prevention Through Environmental Design CPTED

3.4.1. Option 1

The indicative development plan has been considered in accordance with key CPTED principles. These considerations are high level commensurate with the detail appropriate for a rezoning process.

It is recommended that as a part of a future detailed design and development application stage that detailed consideration of safety by design matters in the form of a CPTED study be undertaken.

Key CPTED considerations relevant to the PP and indicative development plan for the purpose of this PP stage of the planning process are outlined as follows:

Maximise visibility and surveillance of the public environment.

- The upper residential levels will provide surveillance over the adjacent street, railway infrastructure and new internal public open space.
- Active retail frontage will provide visibility the adjacent proposed laneways and Markey Square.

Provide safe movement, good connections and access.

- The indicative plan demonstrates a desire to increase permeability throughout the site and immediate precinct by providing a new and activated open air connection through to the car park and Cumberland Street and a new laneway between Cabramatta Road East and Fisher Street to the north. Additional arcade connections are also proposed.

- Indicative site planning demonstrates multiple access points at ground level to a public plaza, which will reduce potential for entrapment.
- Sight lines have been appropriately considered at ground level and appropriately align with the train station entrance. The plaza space internal to the site assist in opening up sightlines and accommodating the offset between the train station entrance and existing car park.
- The offset laneway access through the plaza may result in entrapment opportunities. 24 hour access to enclosed arcades should be considered to provide multiple access and degrees opportunities to the Market Square.

Maximise activity in public places.

- The indicative plan provides for commercial and retail floor space oriented towards key streets, links and the proposed public plaza.

Clearly define private and public space responsibilities.

- Land tenure, management, maintenance responsibilities and security will require further considerations at a detailed design stage.

Manage public space to ensure that it is attractive and well used

- Ground level retail activation and commercial activities on upper levels in combination of residential mass on upper levels will assist in activating existing streets, proposed links and the Market Square.
- Land tenure, management, maintenance responsibilities and security will require further considerations at a detailed design stage.

3.4.1. Option 2 variance

Refer commentary in above Section 3.3.1.

4. Conclusion and Recommendations

4.1. Strategic Merit

On a strategic planning level, the subject site is ideally located and suitable for increased density. Increased density adjacent to railway stations in established centres such as Cabramatta is supported by *A Metropolis of Three Cities - the Greater Sydney Region Plan* and the *Western City District Plan*. However, such strategic documents do not specify the scale or nature of density to be accommodated in each centre.

In the absence of a comprehensive Town Centre Master Plan for Cabramatta, the proposal can only be considered on its site specific merits and the public benefits that it will provide. In this respect, the appropriate management of impacts is essential, particularly solar overshadowing.

It is noted that the urban design principles underpinning the scale represented in the Fairfield centres urban design studies, particularly those for Fairfield City Centre and Villawood, was to test key opportunity sites for their ability to accommodate increased height and density, whilst appropriately managing solar impacts to neighbouring land parcels. It is noted that those plans noted the unique site opportunities presented by large, contiguous opportunity sites such as the subject site.

The PP proposes a high density mixed use built form that will establish a permeable, open-air retail destination with new laneways, arcades and a Market Square, which is conducive to both day and night-time activity. This is proposed to be supported by a VPA letter of offer to

replace and increase of existing public car parking spaces associated with the Fisher Street Car Park and create a new overhead pedestrian bridge between the subject site and the Cabramatta Train station, effectively bridging the east and west side of the centre. The public benefits associated with the proposal are significant and worthy of consideration.

The merits of increased height and density for a large opportunity site in a town centre location adjacent to a railway station are evident, however the lack of a comprehensive town centre plan (as has been undertaken by Council for the Fairfield, Fairfield Heights and Villawood centres) and development precedents provide limited contextual context for the proposed amendment on a precinct and town centre level.

Therefore, the strategic context of the amendment on a town centre level need to be strengthened with the current PP documentation. That is, the applicant should explore further now what is proposed does not preclude future adjoining and town centre development . This could potentially be achieved with some high level opportunities and constraints presentations of the broader Cabramatta Town Centre.

This may include additional consideration the proposed scale of the site and how this may be integrated with a potential future development scale for the surrounding centre, including the western side of the railway station; and demonstrate that proposed heights and density can be appropriately transitioned to outer lying residential areas and towards the western side of the centre.

4.2. Site specific impacts

Notwithstanding the overall strategic merits of the proposal, with regard to the current indicative design concept for the site prepared by Plus Architecture, TPG recommends that the applicant undertake further investigation of the proposed built form massing and its overshadowing impact on developable land parcels to the south (i.e. 126 and 144-156 Cabramatta Road East) to ensure that the future development of the subject site does not unfairly prejudice the development potential of those lots. The zoning of these lots allow for residential purposes. As such a redistribution of building built and reduction in height may need to occur, particularly adjacent to Cabramatta Road East.

Refer also to recommendations in sections 3.1 and 3.2.

4.3. Implementation of intended outcomes

TPG notes that as the PP does not seek approval for an actual built form, it is difficult to ensure that the actual architectural outcomes depicted in the indicative development concept can be realised exactly as depicted. Upon amendment of the relevant controls, later detailed design and development application processes may result in a built form that differs to that depicted in the supporting information provided with the PP.

Therefore, Council should ensure that appropriate mechanisms are put in place to ensure the following key elements and public benefits proposed by the PP can be implemented following any potential amendment of development controls under the FLEP 2013:

- market square;
- open air laneway links;
- activation ground level;
- overhead links to the Cabramatta Railway Station; and
- replacement and increate of public car parking on the site.

The applicant has submitted an offer to enter into a VPA with Council to provide an overhead pedestrian link and public car parking provisions. In addition to the VPA Council should also consider requesting a site specific DCP to be submitted by the applicant to guide other public

benefits envisaged by the plan as well as intended built form outcomes. The preparation of a site specific DCP may occur following a Gateway determination.

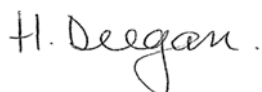
4.4. Summary

The proposal provides a unique opportunity for a development outcome that will result in a number of public benefits. It is recommended that Council work with the applicant to strengthen the strategic merit of the proposal in relation to the proposed scale in its context with the wider Cabramatta Town Centre and to reduce its impacts on neighbouring properties particularly to the south of the site. This may warrant some reconsideration of building height and distribution of massing to ensure that the proposal does not unfairly impact on the solar access and development potential of nearby land parcels.

We trust the above will assist Council in furthering its consideration of the planning proposal. Should you have any queries or require clarification on any matters please do not hesitate to contact the undersigned on 02 9925 0444.

Yours sincerely,

TPG Town Planning and Urban Design



Helen Deegan
Director of Planning



Sonny Embleton
Principal Urban Design | Place