SEPP 65 APARTMENT DESIGN GUIDE COMPLIANCE ANALYSIS 67-73 LORDS ROAD, LEICHHARDT

Jan McCredie Urban Design has been involved in the urban design planning for the site at 67-73 Lords Road, Leichhardt, for a number of years. We were major contributors to the spacial structure and design for the site that was submitted as part of the original Planning Proposal in 2014.

We understand that the Deputy Secretary of the Department of Planning and Environment has now determined that the Planning Proposal for 67-73 Lords Road, Leichhardt, should proceed to the Gateway Determination stage. The documentation has now been updated to address, among other things, the need to consider compliance with the changes to SEPP 65 and the Apartment Design Guide (ADG) which have come into force (in June 2015) since the Planning Proposal was submitted.

We have now undertaken an analysis of the proposed site plan and building envelopes against the relevant (ADG) guidelines and requirements, as outlined in the compliance analysis report that forms part of the updated Planning Proposal. This analysis indicates that the proposed design for the site and the principles upon which the design is based, remain consistent with the State Government's planning and design standards for apartments. While at this stage consent is only sought for the site layout and building envelopes, the analysis shows that the built form envelopes provide for future architectural resolution that is capable of complying with the relevant criteria and providing a quality urban environment.

The site has been planned using a perimeter block typology. This design approach provides a generous communal open space area in the centre of the site and an expansive outlook from many of the apartments. The Concept Design Report that forms part of this updated Planning Proposal provides details about the design principles that have driven the block forms. The urban design for the site has been developed to be compatible with the low density residential housing that exists in the surrounding area. It is also consistent with the development envisaged for the Taverners Hill Precinct under Urban Growth NSW's draft Parramatta Road Urban Transformation Strategy.

We believe that the proposal for the Lords Road site represents an opportunity to deliver good urban design that responds to the existing street pattern and reflects the character of the surrounding built form. The design takes advantage of the strategic location of the site and enables a high level of amenity for the future residents.

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The following table provides details of the analysis that has been undertaken to assess the compliance of the Planning Proposal scheme for 67-73 Lords Road, Leichhardt, against the relevant provisions of the SEPP 65 Apartment Design Guide.

It should be noted that the current proposal for the site is at concept design stage, and approval is only sought for building envelopes and broad design principles as part of this Planning Proposal. As such, many of the provisions within the Apartment Design Guide are not relevant for assessment as part of this documentation. The detailed design for each of the buildings on the site will be the subject of future development applications. Detailed analysis and assessment of the proposed development schemes against the SEPP 65 provisions will be undertaken at that development application stage.

While the detailed design for the buildings on the site has not yet been undertaken, indicative layouts and apartment designs have been prepared to ensure that the spatial arrangement of the overall site and the building envelopes achieve good urban design outcomes and are capable of compliance with the relevant SEPP 65 design provisions. A number of indicative diagrams have been included in this analysis report to demonstrate compliance with SEPP 65 principles. These diagrams should be read as indicative only, and not as a final design outcome. They can be found at Appendix 1 to this analysis report.

Table 1.	Table 1. Table 2. Summary of compliance with the key Apartment Design Guide 'Design Criteria'				
Control	Design Criteria	Capable of compliance	Comment		
Building separation	 Up to four storeys/12 metres 12 metres between habitable rooms/balconies 9 metres between habitable/balconies and non-habitable rooms 6 metres between non-habitable rooms Five to eight storeys/up to 25 metres 18 metres between habitable rooms/balconies 12 metres between habitable rooms/balconies and non-habitable rooms 9 metres between non-habitable rooms/balconies and non-habitable rooms 9 metres between non-habitable rooms 12 metres between non-habitable rooms Nine storeys and above/ over 25 metres 24 metres between habitable rooms/balconies 18 metres between habitable rooms/balconies 18 metres between habitable rooms/balconies 12 metres between non-habitable rooms 12 metres between non-habitable rooms 	Yes	The building envelopes proposed on the site are a maximum of 8 storeys in height. In general, at least 12 metres is achieved habitable rooms/balconies. The future buildings within the proposed building envelopes will be set back at upper levels (above 4 storeys) to ensure that appropriate separation between habitable rooms is achieved. Refer to Fig. 1 and 2 for details regarding building separation.		
	 Minimum distances from side and rear setbacks is required: Up to four storeys/12 metres 6 metres to habitable rooms/balconies 3 metres to non-habitable rooms Five to eight storeys/up to 25 metres 9 metres to habitable rooms/balconies 4.5 metres to non-habitable rooms Nine storeys and above/ over 25 metres 12 metres to habitable rooms/balconies 		 The draft Development Control Plan that is proposed as part of the Planning Proposal for the site includes provisions for boundary setbacks of between 6-7.5 metres. Additional setbacks of up to 9m are proposed on the top floors. This provision complies with the ADG requirement for a 6m setback up to 4 storeys. While it does not strictly comply with the requirement for a 9m setback above 4 storeys, the proposed 6-7.5m is considered appropriate given the context of the site, being surrounded on all sides by either public roads (Lords Road and Davies Lane), the light rail corridor or open space (Lambert Park). Hence there is no instance where there will be an unacceptable distance between habitable rooms/balconies and neighbouring residences. Overshadowing analysis has been undertaken and indicates that the proposed building envelopes will not result in any unacceptable overshadowing of adjoining properties. 		

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	6 metres to non-habitable rooms		
Deep soil	Minimum of 7% of a site should be a deep soil zone with the following minimum dimensions:		The draft DCP includes provisions requiring deep soil planting zones of minimum 6m width around the perimeter and within the central portion of the site.
zones	 650sqm-1500sqm – 3m greater than 1500sqm – 6m 		Refer to diagram G44 in the draft DCP for details.
	25% - 30% of site area should be devoted to communal open space.	Yes	A considerable area of landscaped open space is to be provided within the site. A large proportion of this is to be in the form of a large, single communal open space of approximately 2,800m ² in the central area of the site to provide for both active and passive recreation. Overall, communal open space accounts for approximately 36% of the total site area.
			In addition, the draft DCP incorporates a provision that requires that landscaped area is a minimum of 25% of the total site area. A separate provision requires that a minimum of 1,690m ² of publicly available communal open space is to be provided on the site.
Communal and Open space	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)	Yes	The large area of communal open space has been located centrally within the site to ensure that it will be afforded ample direct sunlight. The draft DCP includes a provision to ensure that communal open space on the site will receive a minimum of 2 hours of direct sunlight between 9 am and 3 pm over 50% direct sunlight at mid winter.
	Ground level apartments should contain a minimum of 15m ² of open space, with a minimum dimension in one direction of 3m.	Yes	The site/building layout and building envelopes have been designed such that ground level apartments will incorporate private open space areas. Across the site there is an abundance of open space. The exact dimensions of the private open spaces will be determined as part of the detailed design process and will be included in a future DA.
	Vehicle access points are designed and located to achieve safety, minimise conflicts between pedestrians and vehicles and create high quality streetscapes.	Yes	The draft DCP contains provisions to ensure that conflicts between different modes of transport are reduced and that a safe environment is provided for pedestrians.
Vehicle access			A one-way shareway is proposed to provide safe access to and movement around the site. Safe access will also be provided for residents using the basement car parking
			Separated pedestrian pathways are to be provided for pedestrian access to dwellings and around the site. A 1.8m wide dedicated cycle lane is also to be provided to safely connect Lords Road and Foster Street.
			Refer to Diagram G46 in the draft DCP for details.
			High quality streetscapes will be provided through upgrades to Lords Road and Davies Lane, on the perimeter

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			of the site, and through the provision of street trees and landscaping.
Car Parking	 For development in the following locations: on sites that are within 800 metres of a railway station or light rail stop in the Sydney Metropolitan Area; or on land zoned, and sites within 400 metres of land zoned, B3 Commercial Core, B4 Mixed Use or equivalent in a nominated regional centre the minimum car parking requirement for residents and visitors is set out in the Guide to Traffic Generating Developments, or the car parking requirement prescribed by the relevant council, whichever is less The car parking needs for a development must be provided off street 	Yes	The site is located within 800m of the Marion light rail stop. The car parking for the site will be proposed as part of the future development applications for the buildings on the site. The draft DCP includes a table outlining the requirements for off street car parking rates. These rates comply with the requirements of the Guide to Traffic Generating Developments, and will be applied at the DA stage. All parking required to service the proposed apartments will be provided on site. Parking associated with the proposed childcare centre will also be provided off-street.
	Parking and facilities are provided for other modes of transport	Yes	Parking and facilities will be provided on the site to cater for bicycles and motorbikes. Consent will be sought for these facilities as part of the relevant future DAs.
	Visual and environmental impacts of on-grade car parking are minimised	Yes	Only a small amount on so-grade car parking is proposed to be incorporated on the site. This will be provided as parallel parking along the one way shareway that runs through the site. As such, the visual and environmental impact of this parking will be minimal, similar to any other on street parking in the area.
Pedestrian access	Access, entries and pathways are accessible and easy to identify.		Separate pedestrian pathways are to be provided to ensure that a safe environment is provided within and surrounding the site. These pathways will be easily identifiable and designed in accordance with Crime Prevention Through Environmental Design principles to ensure that safety is maximized.
	Habitable room depths are limited to a maximum of 2.5 x the ceiling height.	Yes	This issue will be addressed at the detailed design stage, however the building envelopes have been designed to ensure that compliance can be achieved. Refer to Figs. 3-7 for indicative apartment layouts.
Apartment layout	In open plan layouts (where the living, dining and kitchen are combined) the maximum habitable room depth is 8m from a window.	Yes	This issue will be addressed at the detailed design stage, however the building enveloped have been designed to ensure that compliance can be achieved. Refer to Figs. 3-7 for indicative apartment layouts.
	The width of cross-over or cross-through apartments are at least 4m internally to avoid deep narrow apartment layouts.	Yes	This issue will be addressed at the detailed design stage, however the building enveloped have been designed to ensure that compliance can be achieved. Refer to Figs. 3-7 for indicative apartment layouts.
	Living rooms or combined living/dining rooms have a minimum width	Yes	This issue will be addressed at the detailed design stage, however the building enveloped have been designed

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	of: 3.6m for studio and 1 bedroom apartments 4m for 2 and 3 bedroom apartments		to ensure that compliance can be achieved. Refer to Figs. 3-7 for indicative apartment layouts.	
	Master bedrooms have a minimum area of 10m2 and other bedrooms 9m2 (excluding wardrobe space).	Yes	This issue will be addressed at the detailed design stage, however the building envelopes have been designed to ensure that compliance can be achieved. Refer to Figs. 3-7 for indicative apartment layouts.	
	Bedrooms have a minimum dimension of 3m (excluding wardrobe space).	Yes	This issue will be addressed at the detailed design stage, however the building envelopes have been designed to ensure that compliance can be achieved. Refer to Figs. 3-7 for indicative apartment layouts.	
	 Minimum Apartment sizes: 35m² for studios; 50m² for one bedrooms; 70m² for two bedrooms; and 90m² for three bedrooms. Note: An additional 5m² is required for each additional bathroom. 	Yes	This issue will be addressed at the detailed design stage, however the building envelopes have been designed to ensure that compliance can be achieved.	
Balconies	 Apartments are to have the following balcony dimensions: Studios – 4sqm 1br – 8sqm with min. 2m depth 2br – 10sqm with min. 2m depth 3br – 12sqm with min. 2.4m depth 	Yes	This issue will be addressed at the detailed design stage, however the building envelopes have been designed to ensure that compliance can be achieved.	
Ceiling heights	 Minimum ceiling heights are as follows: 2.7m for habitable rooms 2.4m for non-habitable rooms double storey apartments – 2.7m for main living area, 2.4m for second floor where its area does not exceed 50% of the apartment area 	Yes	This issue will be addressed at the detailed design stage, however the building envelopes have been designed to ensure that compliance can be achieved. Refer to Fig. 8 for details regarding ceiling heights.	

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	 attic spaces – 1.8m at edge of room with a minimum 30degree slope in mixed use areas – 3.3m for ground and first floor 			
Internal	The maximum number of apartments off a circulation core on a single level is eight.	Yes	This issue will be addressed at the detailed design stage, however the building envelopes have been designed to ensure that compliance can be achieved. Refer to Fig. 9 for details.	
circulation	For buildings of 10 storeys and over, the maximum number of apartments sharing a single lift is 40.	N/A	N/A	
Storage	 Studio apartments require 4sqm of storage area One bedroom dwellings require 6m³ of storage area Two bedroom dwellings require 8m³ of storage area. Three bedroom dwellings require 10m³ of storage area. 50% of the required storage is to be provided within each apartment. 	Yes	While the detailed design for the apartments has not yet been undertaken, indicative designs have been prepared for the purpose of ensuring that compliance with SEPP 65 can be achieved in the future. The storage areas will be assessed at the detailed design stage of the project, however it is anticipated that storage for all apartments will comply with this requirement.	
Ground floor apartments	Direct street access should be provided for ground-floor apartments.	Yes	Site planning has been undertaken to ensure that separate access can be provided for ground floor apartments.	
	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.	Yes	The draft DCP contains provisions to ensure that 70% of apartments within the buildings on the site will have a minimum of 2 hours of direct sunlight to the main living room between 9 am and 3 pm at mid winter. Refer to Fig. 10.	
Daylight access	In all other areas, living rooms and private open spaces of at least 70% of apartments in a building receive a minimum of 3 hours direct sunlight between 9 am and 3 pm at mid winter.	N/A	N/A	
	A maximum of 15% of apartments in a building receive no direct sunlight between 9 am and 3 pm at mid winter.	Yes	The proposed building envelopes provide for residential buildings where a maximum of 15% of apartments receive no direct sunlight between 9 am and 3 pm at mid winter	
	Daylight access is maximised where sunlight is limited	Yes	The provisions of the draft DCP will ensure that this objective is achieved.	

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	Design incorporates shading and glare control, particularly for warmer months		Yes	Appropriate shading devices will be incorporated at the detailed design stage of the development.	
Natural ventilation	nine storeys of the b deemed to be cross	tments are naturally cross ventilated in the first building. Apartments at ten storeys or greater are ventilated only if any enclosure of the balconies s adequate natural ventilation and cannot be	Yes	The tallest of the building envelopes proposed on the site is 8 storeys.	
	Overall depth of a cross-over or cross-through apartment does not exceed 18m, measured glass line to glass line.		Yes	The proposed building envelopes, together with the draft DCP provisions guiding setbacks, building articulation zones and building separation, have been designed to ensure that the overall depth of apartments will comply with this requirement. Refer to Fig. 12-13 for building depth of cross through apartments	
	All habitable rooms	are naturally ventilated	Yes	The design of the building envelopes ensures that all habitable rooms are capable of being naturally ventilated.	

APPENDIX 1