

6th January 2011

Attention: **Peter Thomas**
Manager, Development Assessment
May Li, Assessing officer,
Lane Cove Council
PO Box 20 Lane Cove
NSW 1595

Dear Mr Thomas,

**RE: Amended Development Proposal 554-560 Mowbray Road Lane Cove
SEPP 65 COMMENTS AND RECOMMENDATIONS**

Thank you for inviting me to comment on the amended plans of this project this project.

The following comments have been prepared based on the drawings and documents supplied by Council Including: Drawings by Wolski Coppin Architecture including drawings C1, C2 DA/B, S1, S2, S3 DA/B, SS1DA dated 2/12 2010 . 02-DA/B-12DA/B dated 2/12 10-12 Planners statement by Ooi Personal Planning Services Pty Ltd dated 1/12 2010, We take on face value the accuracy of all the documents given to us and rely on them to form our assessment.
We have visited the site.

DESIGN QUALITY PRINCIPLES

Part 2 of SEPP 65 sets out the following design quality principles as a guide to assess a residential flat development. The 'Residential Flat Design Code' (The Code) is referred to as an accepted guide as to how the principles are to be achieved.

1. Context

Good design responds to and contributes to its context. Context can be defined as the key natural and built features of an area. Responding to context involves identifying the desirable elements of a location's character or, in the case of precincts undergoing a transition, the desired future character as stated in Planning and design policies. New buildings will thereby contribute to the quality and identity of an area. (SEPP65)

The site fronts onto Mowbray Road and Giraween Avenue. The site slopes away steeply from Mowbray Road, which is on a ridge. The area is characterised by a mixture of single level detached dwellings and 3-4 storey residential flat buildings. The area is in transformation with residential flat buildings replacing the single dwellings. The area is serviced by a bus, which has a stop at the site.



Additional residential density is appropriate in the area. A building of this scale and use will not be out of context

The proposal meets the objectives of this principle.

2. Scale

Good design provides an appropriate scale in terms of the bulk and height that suits the scale of the street and the surrounding buildings.

Establishing an appropriate scale requires a considered response to the scale of existing development. In precincts undergoing a transition, proposed bulk and height needs to achieve the scale identified for the desired future character of the area. (SEPP65)

The proposal generally follows the height plane principles set out for the site under the LEP however it is noted that the section provided was taken through the more advantageous part of the site and that the proposal exceeds the Height plane in some areas

The proposal will be of a similar scale to the other 3 storey buildings on Mowbray Road. The proposal is in keeping with the future desire character of Mowbray Road in terms of scale.

The building's bulk and scale will create overlooking and overshadowing impacts on the dwellings that front on to Gordon Street on the southern side of the site. It is assumed that at some stage, these sites will also be re-developed. It is my concern, however, that when they are, they too will be largely overshadowed by the proposed development. I therefore question the scale of the building, with respect to the sites on the southern side.

The proposal generally meets the objectives of this principle. With the exception of the overshadowing impact the bulk of the building has on the properties to the south.

3. Built form

Good design achieves an appropriate built form for a site and the building's purpose, in terms of building alignments, proportions, building type and the manipulation of the building elements.

Appropriate built form defines the public domain, contributes to the character of streetscape and parks, including their views and vistas, and provides internal amenity and outlook.(SEPP65)

The form of the building will appear appropriate and sympathetic to the Mowbray Road Streetscape. The form of the building from Girraween Avenue turns the corner from Mowbray Road convincingly but in my opinion does not step down the site sufficiently, and quickly becomes a building of a scale that is inconsistent with the Mowbray Road character, which in my opinion should be of a larger order than that of the side streets.



The building footprint is extremely wide and deep, resulting in apartments to be narrow and deep. Too many of them do not have cross ventilation. Without including the south-east and south-west wings, the building is 19-20m deep for the top couple of floors, which would normally be the depth of a “cross-over” type of building.

The ground, first and second floors (including the southern wings) have a very large floor-plate of about 50x35m (less a courtyard of about 10x10m on the southern side), which results in many single orientation apartments. The apartments that open onto the small courtyard would appear to be severely overshadowed.

The communal open space in the south-facing courtyard will be overshadowed throughout the year.

The large footprint of the development results in a built form that does not achieve good amenity. It is principally for this reason that the proposal does not meet the principles of the objective.

4. Density

Good design has a density appropriate for a site and its context, in terms of floor space yields (or number of units or residents)

Appropriate densities are sustainable and consistent with the existing density in an area or, in precincts undergoing a transition, are consistent with the stated desired future density. Sustainable densities respond to the regional context, availability of infrastructure, public transport, community facilities and environmental quality. (SEPP 65)

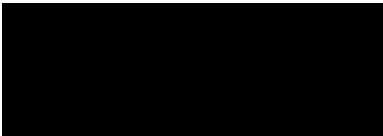
The number and mix of apartments is appropriate. This sort of density is consistent with the future desired density of the area.

The proposal meets with the objectives of this principle.

5. Resource, energy and water efficiency

Good design makes efficient use of natural resources, energy and water throughout its full life cycle, including construction. Sustainability is integral to the design process. Aspects include demolition of existing structures, recycling of materials, selection of appropriate and sustainable materials, adaptability and reuse of buildings, layouts and built form, passive solar design principles, efficient appliances and mechanical services, soil zones for vegetation and re-use of water. (SEPP65)

Of 58 units, 11 have cross-ventilation, 23 are in a corner situation and 24 have no cross-ventilation. This is very high proportion of units that will require mechanical ventilation and/ or air conditioning. A



good number of units will also have little or no direct sunlight. I refer specifically to those on the southern side of the building.

The single orientation apartments on the east and west sides of the building will be hard to keep cool in the summer and will rely on air-conditioning. The vertically proportioned windows to the east and west show no sun control.

There is no provision for the harvesting or storage of rainwater in this proposal. This could have been easily accommodated in the basement.

The proposal does not meet the objectives of this principle.

6. Landscape

Good design recognises that together landscape and buildings operate as an integrated and sustainable system, resulting in greater aesthetic quality and amenity for both occupants and the adjoining public domain.

Landscape design builds on the site's natural and cultural features in responsible and creative ways. It enhances the development's natural environment performance by coordinating water and soil management, solar access, microclimate, tree canopy and habitat values. It contributes to the positive image and contextual fit of development through respect for streetscape and neighbourhood character, or desired future character.

Landscape design should optimise usability, privacy and social opportunity, equitable access and respect for neighbours' amenity and provide for practical establishment and long-term management. (SEPP65)

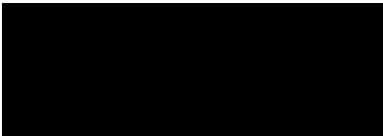
Most of the landscaping occurs in the setback zones. Whilst the building will appear from the exterior to be in a landscape setting, the landscape zones are more or less just a buffer to the neighbours or to the street and are not very useful as common areas. Notwithstanding, the landscape plan indicates a good range of plants from small and medium shrubs and large native trees, which will enhance the biodiversity of the area.

The proposal generally meets the objectives of this principle.

7. Amenity

Good design provides amenity through the physical, spatial and environmental quality of a development.

Optimising amenity requires appropriate room dimensions and shapes, access to sunlight, natural ventilation, visual and acoustic privacy, storage, indoor and outdoor space, efficient layouts and service areas, outlook and ease of access for all age groups and degrees of mobility. (SEPP65)



The proposal has good-sized useful balconies or courtyards and adequate storage within the apartments with a generous amount of additional storage in the basement.

Whilst most rooms have good windows, some rooms have indirect light from window niches or no windows at all.

The main pedestrian entry and wheelchair Access has been provided ½ way along the Giraween Avenue frontage. Giraween Street is very steep. I calculate a gradient of about 1:4 from Mowbray Road which is not navigable in a wheel chair. The entry could be relocated to Mowbray road in order to achieve equitable access.

The proposal generally meets the objectives of this principle with the critical exception of the accessibility issue.

8. Safety and security

Good design optimises safety and security, both internal to the development and for the public domain. This is achieved by maximising overlooking of public and communal spaces while maintaining internal privacy, avoiding dark and non-visible areas, maximising activity on streets, providing clear, safe access points, providing quality public spaces that cater for desired recreational uses, providing lighting appropriate to the location and desired activities, and clear definition between public and private spaces. (SEPP65)

With the exception of the accessibility issue, the entry experience to the development has generally been well considered with respect to safety and security. The entry is both well protected and has clear lines of sight.

The proposal meets with the objectives of the principle

9. Social dimensions

Good design responds to the social context and needs of the local community in terms of lifestyles, affordability and access to social facilities. New developments should optimise the provision of housing to suit the social mix and needs of the neighbourhood or, in the case of precincts undergoing transition, provide for the desired future community. (SEPP65)

The proposed mix of dwellings is appropriate to the area and should accommodate a range of occupants.

It is a shame that the proposal does not offer a common room or sunny courtyard given that there could be about 100 people living in the building.



The proposal generally meets the objectives of this principle.

10. Aesthetics

Quality aesthetics require the appropriate composition of building elements, textures, materials and colours and reflect the use, internal design and structure of the development. Aesthetics should respond to the environment and context, particularly to desirable elements of the existing streetscape or, in precincts undergoing transition, contribute to the desired future character of the area. (SEPP65)

The design language, materials selection and building articulation are well handled, and would contribute positively to the future desired character of the area.

The proposal meets the objectives of this principle.

Conclusion

The amendments to the design do not address the main concerns raised in my report of October 2010.

The critical issue, which in my view requires the project to re-planned, is the positioning of the entry on Girraween Street, which, due to the extreme slope of the street, discriminates against mobility impaired people and is therefore in contravention of the Disability and Discrimination Act.

The large footprint in this proposal results in a number of units with insufficient sun, no, or poor cross ventilation; too many to achieve the objectives of Good Design with respect to Amenity, Resource, energy and Built form.

The proposal also significantly overshadows it's own communal open space as well as the neighbours to the South.

Tim Williams
Architect AIA

