



31st January 2012,

Attention: May Li, Assessing officer,
Lane Cove Council
PO Box 20 Lane Cove
NSW 1595

Your ref: DA11/233

Dear Ms May Li,

**RE: Development Proposal 7-13 Centennial Ave & 92-96 Gordon Street Lane Cove
SEPP 65 COMMENTS AND RECOMMENDATIONS**

I refer to your letter of the 5th January requesting my comment on the matter.

The following comments have been prepared based on the drawings and documents supplied by Council Including:

- Drawings by Hyecorp design in collaboration with Amglen P/L including drawings: DA00-DA17, sh01 DA COM DA-DSL,DAFSR,DA-SSA, DA-SUN, DA CMP, DA CV, DA-AA, DA-SS, DASSA , DA-SUN,DA-SA01-2, dated 07-15 /12/ 11
- SEE vol 1&2 by Metroplan dated 12/ 2011,
- Landscape Plan by Iscape.

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 and seen the model at the Council.

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 area is characterised by a mixture of single and double level detached dwellings in the immediate vicinity and some 3-4 storey residential dwellings nearby on Mowbray Road. The area is identified as being in the Zone R4- High density residential and is in the process of transformation, with residential flat buildings replacing the single dwellings. The area is serviced by buses on Mowbray Road and Centennial Avenue.

The site is the location of an old quarry. The existing dwellings on the site have built on the quarried site. It is understood that the existing ground level is now considered as the natural ground level. The excavated or quarried parts of the site will present challenges for the architects as good amenity may difficult to achieve adjacent to the quarry walls. In addition, the potential for the sites to the north of the subject site to be developed must be taken into account, thereby exacerbating the challenges relating to the levels of the site.

The proposal is for three separated buildings. Two front onto Centennial Avenue and one onto Gordon Crescent. The buildings will represent a substantial and seemingly impermeable building frontage to Centennial Avenue, which is out of context with both the existing and the desired future character.

The proposal does not meet 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.

The proposal is for three buildings of a very large footprint that are too deep, too wide and too close together (as outlined below). The buildings do not appear to follow the height plane restrictions with respect to the existing levels of the site and are generally 5-6 storeys (18m) instead of 3-4 (12m). The building separation proposed would not be sufficient even for 4 storey buildings as they are under 12m. The building separation between buildings of 5-6 storeys needs to be 18m. The same principle applies to of distances from the boundaries, which should be a minimum of 9m for buildings of 5-6 storeys and 6m for buildings of 4 storeys. The scale of the development is too large for the site, it results in unacceptable amenity for the residents and buildings that will have a negative impact on the character of the area.

The proposal does not meet the objectives of this principle.

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.

The form of the buildings appears to be governed by the height and setback requirements that would apply to the site if the quarry did not exist, however the history of the site is such that the existing situation is now accepted as the natural ground level, in which case the form of the building is outside the allowable envelope.

Even if one was to accept that the excavated site somehow gave the site exceptional status, the proposed built form does not meet the setback, building separation or building depth requirements of the SEPP.

Less than minimum setbacks have been provided between the buildings and to the boundary and in several instances they do not achieve the minimum standard. I have scaled the distances below as the distances shown on the plan are indicated from the building face as opposed to the balconies as required i.e.:

- Distance of Block A from NW Boundary = 5.2m instead of minimum 9m
- Distance of Block B from NE boundary= 5.2m instead of minimum 9m
- Distance from Centennial boundary =6.5 instead of minimum 7.5m
- Distance between Block B and Block C= 9m at NW corner and 10.5m on N side of block C instead of 18m
- Distance between block A and Block B is 11m on both internal facades instead of 18m

There is no reason why these minimum distances cannot be achieved on this site. These distances are not even acceptable for 3-4 storey buildings.

The buildings are much wider or deeper than recommended The RFDC recommends building depths of 10-18m. The proposed buildings are unacceptably deep:

- Building A is 25m in the northern portion and 30m in the southern portion.
- Building B is 25m in the western portion and 32m in the eastern portion. The central and thinnest part is 21m deep.
- Building C is 27.5m in the western portion and 33m in the eastern section.

The systematic double loading of corridors results in a built form that does not provide good amenity.

The façades to Centennial Avenue appear to keep within the 12m or 3-4 storey height limit of the LEP. Unfortunately, this achieved by cutting into the site or building within the quarried area which results in apartments completely below ground level of the building.

The proposal does not meet the objectives of the principle.

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 density proposed on this site is not appropriate to the area or the desired character of the area. Developments that result in such poor amenity are too dense. The number and configuration of the units needs to be altered.

The proposal does not meet 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)

There is some indication of sun shading on the north, west and east facades. Cross ventilation is not satisfactory and is discussed below.

Not enough units will receive the required sun in winter and will require heating.

There is a commitment to the use of energy and water efficient appliances.

There are not enough deep soil zones.

There is too much excavation.

The proposal partially meets 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)

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.

Almost no existing trees are retained in this proposal. The excavation at the boundary lines does not allow the retention of trees, nor the planting of significant trees. Other than on the western corner, the site will be largely without trees.

The proposal relies on the trees beyond the site for any landscape amenity. The landscape to the south of the development will be largely in the shadow of the development, changing the micro climatic conditions in this area.

The leafy Landscape character of Lane Cove is one of its major attributes. This landscape proposal is not consistent with this character and will diminish it significantly.

The proposal does not meet 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)

We have made our own assessment of the amenity of the proposal by analysing the drawings provided and assuming that the sites to the north will be similarly developed. We have prepared some 3D drawings to test some of the sun angle assumptions and have found the following:

South Facing units:

There are 29 south facing units or 15.3%. This is well over the 10% maximum rule of thumb.

Units not receiving sufficient sun between (9)am and 3:00pm on the 21st June:

There are 104 units that do not comply or 55%. these are identified in the table attached.

This is well in excess of the 30% rule of thumb.

Cross ventilation:

There are 78 units that are not cross or corner ventilated or 41.3%, which is above the 40% rule of thumb. These are indicated in the table below.

We have also included lists of units that partially achieve the sun and ventilation requirements but are not deemed to comply.

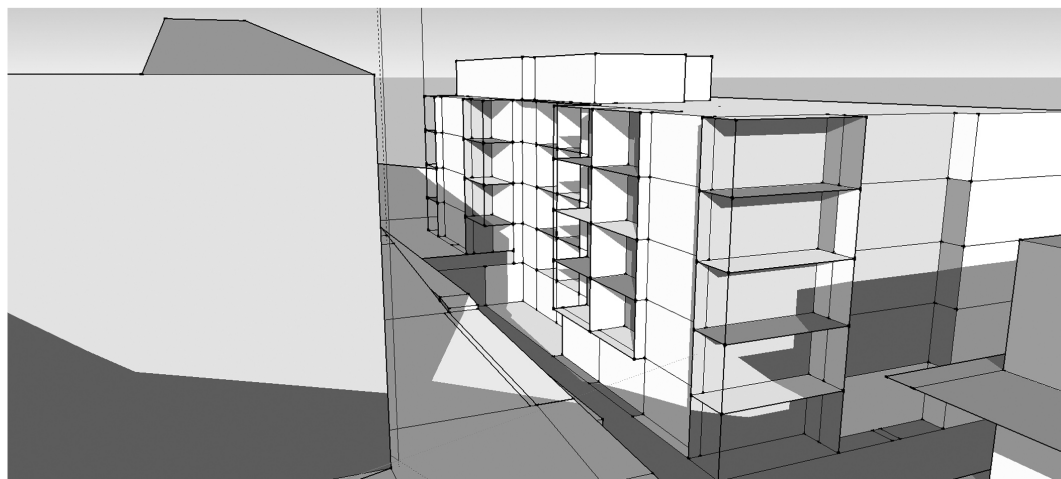
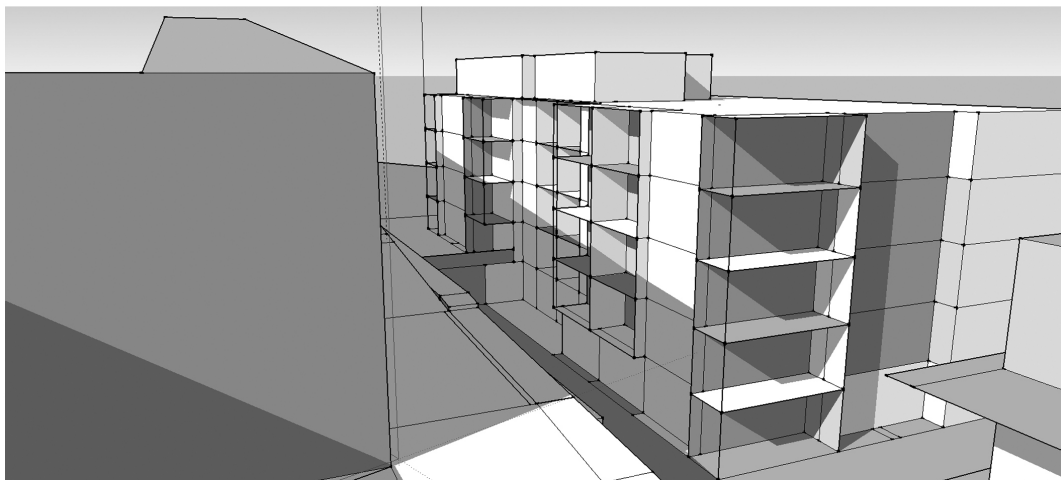
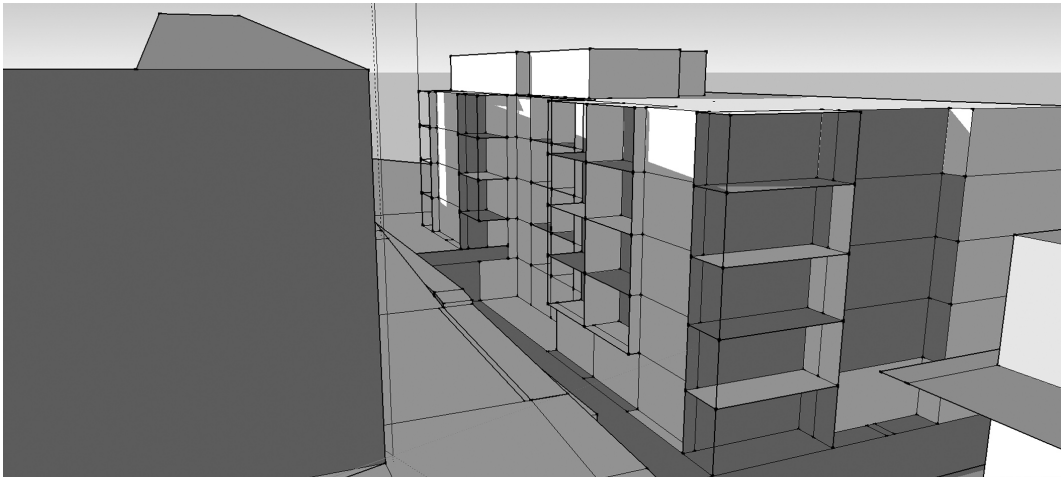
Table of amenity compliance.

The three blocks are wheelchair accessible.

The inadequate setbacks and building separations within the development will cause considerable visual and acoustic amenity issues.

There are many units under the natural ground level, notably on the eastern and northern sides of the proposal. The amenity of some of these units is very poor as they have little if any outlook, sun and reduced ventilation.

The site to the south of the site will be largely overshadowed by the development and will only receive partial sun after 2:00pm in winter.



Building B shadow study 9:00 am 12:00 and 3:00pm

	affected units	TOTAL	Nbr Flat	%
South Facing units – Max 10 %	A.06 ; A.13 ; A.38 ; A.52 ; A.63 ; A.67	6	29	189
	B.01 ; B.08 ; B.09 ; B.21 ; B.22 ; B.34 ; B.35 ; B.47 ; B.48 ; B.60	10		
	C.01 ; C.02 ; C.03 ; C.06 ; C.07 ; C.08 ; C.16 ; C.23 ; C.26 ; C.38 ; C.39 ; C.51 ; C.59	13		
Units not receiving 3Hrs sun – Max 30 %	A.01 ; A.02 ; A.03 ; A.06 ; A.07 ; A.09 ; A.11 ; A.12 ; A.13 ; A.18 ; A.19 ; A.20 ; A.22 ; A.23 ; A.24 ; A.25 ; A.30 ; A.31 ; A.34 ; A.35 ; A.36 ; A.37 ; A.38 ; A.39 ; A.41 ; A.48 ; A.49 ; A.50 ; A.51 ; A.52 ; A.53 ; A.59 ; A.60 ; A.61 ; A.63 ; A.64 ; A.67	37	104	189
	B.01 ; B.02 ; B.04 ; B.05 ; B.06 ; B.07 ; B.08 ; B.09 ; B.10 ; B.12 ; B.13 ; B.14 ; B.15 ; B.16 ; B.17 ; B.18 ; B.19 ; B.20 ; B.21 ; B.22 ; B.29 ; B.30 ; B.31 ; B.32 ; B.33 ; B.34 ; B.35 ; B.43 ; B.44 ; B.45 ; B.46 ; B.47 ; B.56 ; B.57 ; B.58 ; B.60 ; B.63	37		
	C.01 ; C.02 ; C.03 ; C.04 ; C.05 ; C.06 ; C.07 ; C.08 ; C.09 ; C.10 ; C.11 ; C.12 ; C.13 ; C.15 ; C.16 ; C.18 ; C.19 ; C.20 ; C.21 ; C.23 ; C.25 ; C.26 ; C.32 ; C.36 ; C.37 ; C.38 ; C.48 ; C.49 ; C.52 ; C.57	30		
Units not cross ventilated – Max 40 %	A.09 ; A.10 ; A.12 ; A.16 ; A.17 ; A.19 ; A.20 ; A.22 ; A.27 ; A.28 ; A.30 ; A.31 ; A.34 ; A.35 ; A.36 ; A.41 ; A.42 ; A.44 ; A.45 ; A.48 ; A.50 ; A.55 ; A.56 ; A.59	24	78	189
	B.01 ; B.04 ; B.05 ; B.06 ; B.09 ; B.12 ; B.13 ; B.15 ; B.16 ; B.18 ; B.22 ; B.25 ; B.26 ; B.28 ; B.29 ; B.31 ; B.35 ; B.38 ; B.39 ; B.41 ; B.42 ; B.44 ; B.48 ; B.51 ; B.52 ; B.54 ; B.55 ; B.57 ; B.60	29		
	C.02 ; C.05 ; C.07 ; C.10 ; C.12 ; C.13 ; C.14 ; C.15 ; C.18 ; C.20 ; C.21 ; C.25 ; C.28 ; C.30 ; C.31 ; C.34 ; C.36 ; C.41 ; C.43 ; C.44 ; C.47 ; C.49 ; C.53 ; C.55 ; C.56	25		
Partially receiving Sun 2Hrs.	A.02 ; A.09 ; A.24 ; A.30 ; A.31 ; A.35 ; A.36 ; A.37 ; A.49 ; A.50 ; A.51 ; A.60	12	24	189
	B.04 ; B.10 ; B.12 ; B.14 ; B.29 ; B.46	6		
	C.11 ; C.15 ; C.18 ; C.19 ; C.21 ; C.25	6		
Partially cross ventilated.	A.02 ; A.04 ; A.05 ; A.08 ; A.11 ; A.15 ; A.18 ; A.23 ; A.26 ; A.29 ; A.40 ; A.43 ; A.49 ; A.53 ; A.54 ; A.60 ; A.66	17	32	189
	B.08 ; B.21 ; B.34 ; B.47	4		
	C.01 ; C.03 ; C.06 ; C.08 ; C.16 ; C.23 ; C.26 ; C.38 ; C.39 ; C.51 ; C.59	11		

The proposal does not meet the objectives of this principle.

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)

Safety and security appear to be adequately handled.

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.

For a development of this size, the proposal lacks communal spaces or adequate communal open spaces. There is a small theatre and a lap pool in the basement areas which seem under-scaled for a development of this size. Much of the communal open space is provided on the roof, which is seldom if ever used by residents. There is little attempt to provide the residents with the spaces necessary to form a sense of community.

The proposal does not meet 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)

It is hard to look past the sheer bulk and scale of this development. This aspect, which does not respond sympathetically to the environment of Lane Cove outweighs any further discussion of aesthetics.

The proposal does not meet the objectives of this principle.

Conclusion

In my view, the proposal fails to meet the objectives of the good design principles of context, scale, built form, amenity, landscape, social dimensions and aesthetics.

Tim Williams
Architect AIA

