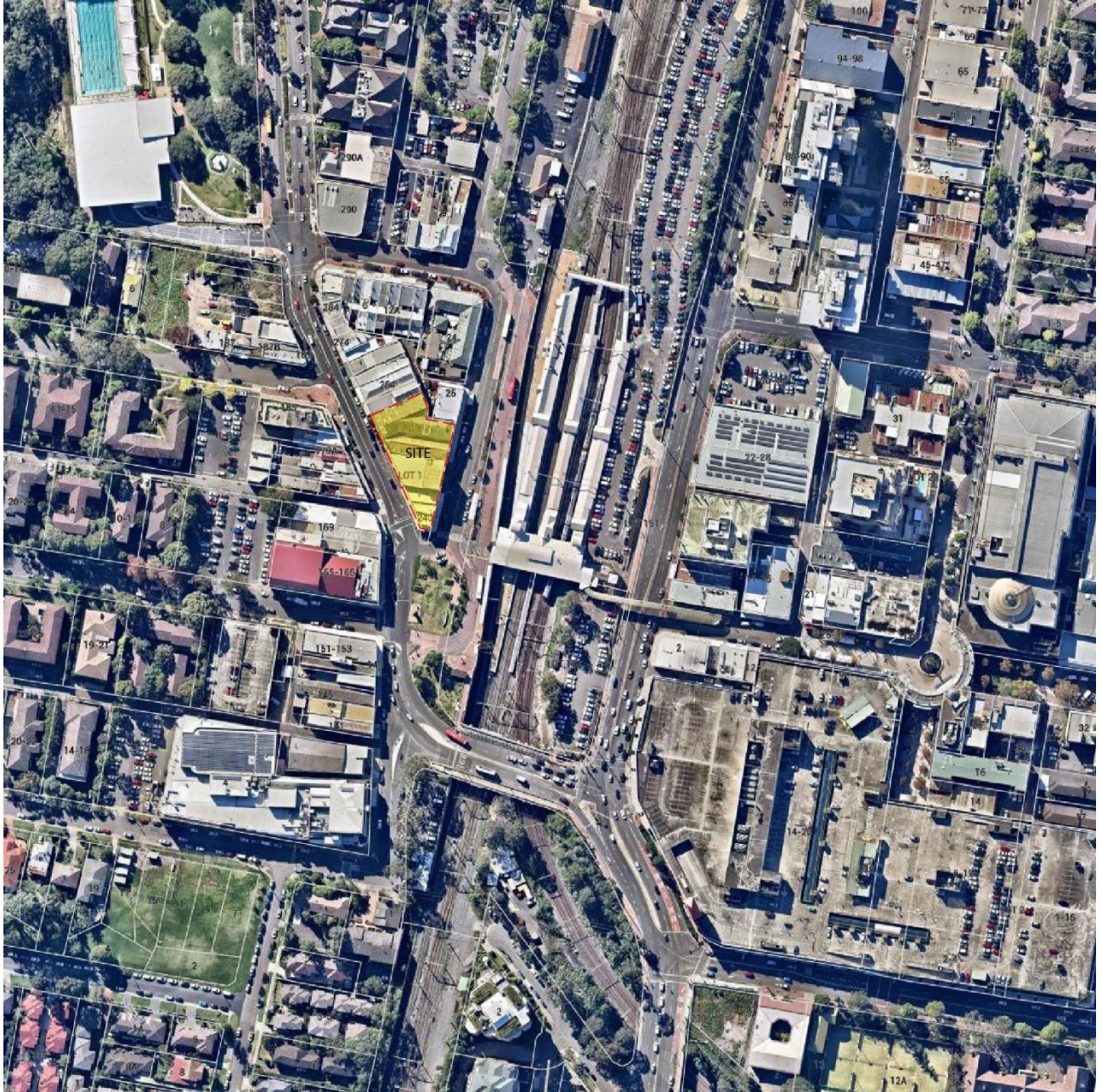


Urban Design Assessment



Council Ref. DA/371/2015

GMU Ref. 15094



Proposed Mixed Use Development at
240-260 Peats Ferry Road, Hornsby

Final report: 3 August 2015

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I Introduction

GM Urban Design & Architecture (GMU) has been appointed by Hornsby Shire Council to undertake an urban design review of the Indicative Development Design proposed for a mixed-use development at No. 240-260 Peats Ferry Road, Hornsby. As stated in the Applicant's Urban Design Assessment and Statement of Environmental Effects (SEE), *"the application is a Stage 1 DA and does not seek consent for the detailed construction of the development on site"*. The documentation provided as part of the Stage 1 application concentrates on the overall built form envelope and it does not provide detailed/indicative information regarding internal layouts of typical residential tower levels. Therefore, this report does not provide a commentary on SEPP 65 internal amenity issues. This report concentrates on the proposal's response in terms of built form and contextual fit and its performance against Council's Design Excellence Criteria.

The purpose of this report is to provide an urban design opinion and commentary on the proposed interface with the public domain and the proposal's response to the immediate context as well as its overall contribution to the heritage conservation area. This report will focus on the proposal's likely impacts on the adjoining properties - existing and future buildings (based on allowable building envelopes under the HDCP), as well as its impacts on the existing public domain and Council's Landscape & Public Domain Plan.

I.1 Documents Reviewed

In preparing this report, GMU has reviewed the following documents describing the development proposal:

- Stage 1- Amendment Building Envelope and Footprint, Architectural drawing package by Ezzy Architects, dated May 2015
- Statement of Environmental Effects by Key Urban Planning, dated October 2014
- Urban Design Assessment by Cardno (NSW/ACT) Pty Ltd, dated December 2015
- Heritage Impact Statement by CoAssociates Pty Ltd, dated December 2014
- Pedestrian Wind Environment Statement by WindTech dated 10 December 2014

GMU has reviewed the following controls relevant to the development proposal:

- Hornsby Shire Local Environmental Plan 2013 (HLEP)
- Hornsby Shire Development Control Plan 2013 (HDCP)
- SEPP 65 and the Residential Flat Design Code (RFDC)
- Hornsby West Side Precinct Urban Design Analysis by JBA dated April 2013
- Hornsby West Side Precinct Draft Structure Plan by JBA dated April 2013

GMU has also undertaken a number of site visits on 25 May and 14 July, 2015 and carried out extensive photographic documentation of the site and the immediate surroundings.

I.2 Executive Summary

According to Hornsby Development Control Plan 2013 Figure 4.5 (i): West Side precinct – Building Height Plan, the proposed development is located on a 'key site' and has the highest allowable height (25 storeys or 77.5m) within Hornsby Town Centre – West Side Precinct. Overall, the proposed height is generally compliant with the permissible heights allowed within the West Side Precinct; however, the proposed built form does not achieve a slender ratio or display the expected levels of design excellence for a 'key site'.

The proposal's overall proportions are generally bulky and the lack of adequate setbacks for the main tower levels lead to the perception of overwhelming bulk and scale when seen from the immediate public domain and from medium to long distance vantage points. At the lower ground level, the proposal's interface with the immediate public domain deliberately departs from the predominant setback and fails to provide consistent upper level setbacks. This contributes to the perception of greater bulk and scale and provides an unbalanced built form dialogue with the existing lower scale heritage streetscape on the rest of the block and across Peats Ferry Road. This assessment has identified a number of adverse outcomes derived from the proposed massing and interface with the public domain and can be generally grouped in to three main categories. These are as follows:

- The proposal's contextual fit and response to the heritage context
- The proposal's overall bulk and scale
- The proposal's interface with the existing immediate public domain and Council's future Landscape and Public Domain Plan

The above listed issues will be discussed in the following sections of this report.

1.3 Subject Site

The site is located within the Hornsby Town Centre – West Side Precinct, within the triangular block bounded by Peats Ferry Road, Station Street and Coronation Street. The site has frontages to both Station Street and Peats Ferry Road, which are prime street frontages to this triangular site; the site faces Cenotaph Park directly to the south. According to the documentation provided, the proposed development encompasses landholdings legally described as Lots 18,19, 20, 21 & 22 in DP 13812, Lot 1 in DPs 114653, 1053591, 171959, 171958, 172708 and Lot A in DP 325525. The proposal involves the demolition of the following existing retail and commercial buildings along Peats Ferry Road:

- No. 240-242 (2 storey)
- No. 244 (2 storey)
- No. 246 (3 storey)
- No. 248-252 (3 storey)
- No. 254-260 (2 storey)

The site is triangular in shape and has a total area of 1,661.68m² with the following dimensions according to the SEE:

- 64.57m to Peats Ferry Rd (western boundary);
- 5.78m along southern boundary at the splay of Peats Ferry Rd and Station St intersection;
- 57.37m to Station Street (eastern boundary); and
- Part 29.12m, 3.32m and 12.61m for the various irregular segments generally along the northern boundary.

The subject site adjoins two properties and the rear access lane along its northern boundary. These two adjoining properties are No. 262 Peats Ferry Road along the western boundary and No. 23-23A Station Street along the eastern boundary. These adjacent properties are 2 storey brick buildings currently occupied by restaurants at ground level and commercial suites on the levels immediately above. The proposal does not include No. 23-23A, which is located between the site's northern boundary and a service lane. It is important to note that due to the proposed configuration of the tower the location of the proposed access driveway, No. 23-23A is considered an isolated site.

The subject site is adjacent to a local transport node, being directly opposite the Hornsby Train Station and Bus Interchange. Based on the current and future influx of commuters traversing pass this site, in addition to its strategic location as a 'gateway' into the precinct upon arrival by train and its location bordering Cenotaph Park, this report will carefully assess this concept proposal's public interface and contribution to the character of the precinct.

1.4 The Proposal

According to the SEE dated April 2015, the concept proposal for this mixed-use development consists of:

- A 400 seat theatre at Lower Ground Level
- Entry and restaurant on Ground Level
- Commercial offices on the First Level
- 22 storeys of residential uses, totalling 220 apartment units
- 8 levels of basement parking (inclusive of loading dock)

As shown in Figure 1, the concept design proposes the introduction of an irregular footprint at the Ground Level, with a partially covered Winter Garden located generally to the north of the tower form. The proposed shape departs from the predominant building alignment on the rest of the street and proposes a series of irregular setbacks along all the boundaries to the public domain. The proposed built form complies with the 0m setback required at this level on 4 locations only where the curvilinear form tangentially meets the property boundary. The majority of the proposed lower built form (up to level 5) is deliberately setback and does not follow the existing predominant streetscape present on the rest of the street along both the Peats Ferry Road and Station Street frontages.

Above level 5, the tower presents a more rectilinear shape. According to the image titled Site Survey 02 in page 4 of the Heritage Impact Statement – by CoAssociates, the tower is divided into three separate segments i.e. Corner Building, Middle Building and Northern Building. Even though the tower is perceived as a single monolithic form, this report will follow this terminology for ease of description and reference.

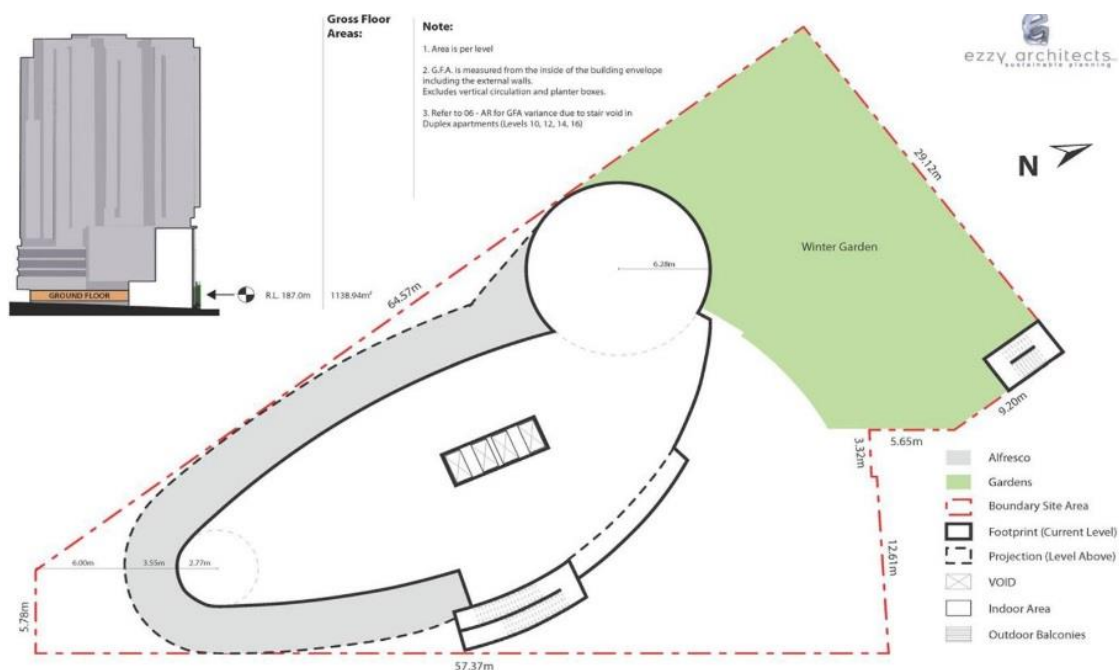


Figure 1_Proposed Ground Floor Plan (Courtesy of Ezzy Architects)

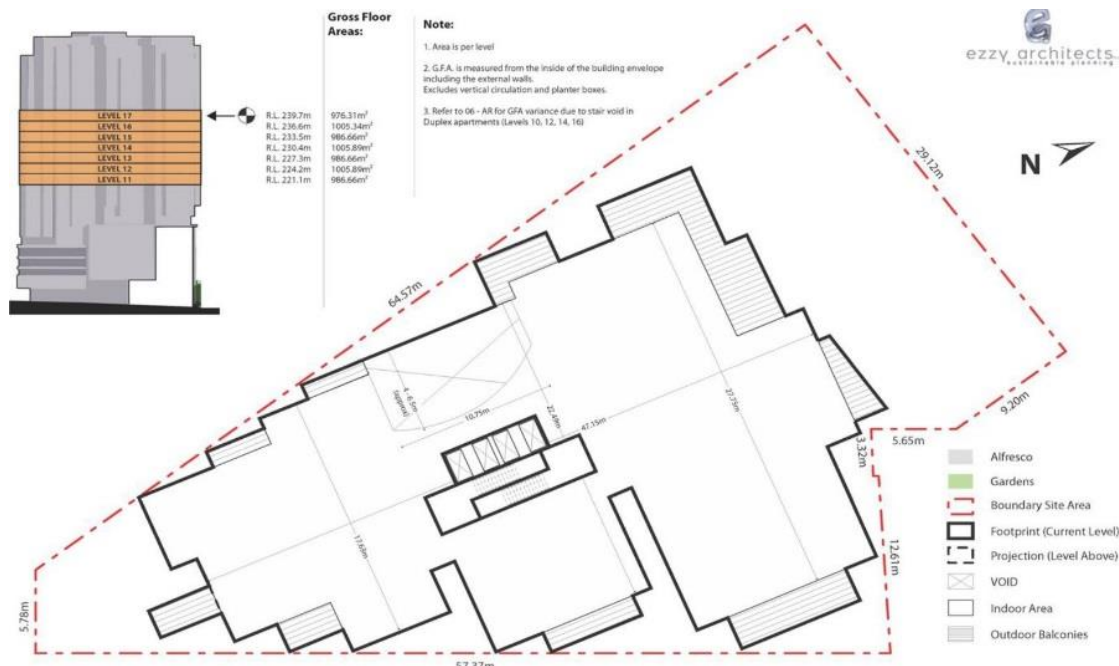


Figure 2_Proposed Typical Floor Plan (Courtesy of Ezzy Architects)

As Figure 2 shows, the upper levels of the tower are generally oriented in a north-south axis with its longest elevations (approximately 50m) running parallel to Peats Ferry Road and Station Street. The proposal presents as a 25 storey point form tower; it is generally triangular in shape with its narrowest end located toward the corner building facing due south to Cenotaph Park. The tower at its widest northern end presents a (glass to glass) depth of 27.82m with its overall balcony to balcony edge being approximately 32m. The glass to glass depth of the Middle Building is 22.49m with its overall balcony to balcony depth being approximately 24.49m.

Based on the information submitted, the driveway to the basement car parking levels will be located at the North East Corner on the Lower Ground Level facing Station Street. The driveway is immediately adjacent to No. 23-23A Station Street, which is not part of the subject site. The following section of this report discusses the urban design outcomes of the proposed massing and built form relationships described above.

2 Urban Design Assessment

2.1 Contextual fit and response to the heritage context

The West Side Precinct is the traditional heart of Hornsby. Council has plans to revitalise this retail hub while preserving its heritage character. The subject site is within the 'Peats Ferry Road' Precinct of the Hornsby West Heritage Conservation Area. Across Peats Ferry Road, opposite the subject site, there are several heritage listed items, of which 2 of these buildings are listed as significant heritage items. It is envisaged in the HDCA that *"developments along the Pacific Highway and Coronation Street should strengthen the 'main street' shopping and dining character of the precinct and should preserve high value heritage buildings and facades that enhance the streetscape and contribute to the overall sense of place of the precinct."*

As shown in Figures 3 and 4, the existing predominant streetscape consists of 1-2 storey plus parapet 'fine grain' shop-top premises contributing to a generally consistent street wall height. Based on the continuity and consistency of the street wall height along both sides of the road, there is a balanced streetscape dialogue between both sides of the street. This contributes significantly to the character of the Conservation Area where there is a variety of architectural styles ranging from federation to interwar periods. There is also a variety of ornamental styles with some buildings exhibiting very ornate parapets with a variety of pediments, finials and window openings.



Figure 4_ View of the existing streetscape on the subject block



Figure 3_ Peats Ferry Rd Retail Frontages view from the north

This contributes to a positive pedestrian experience along all frontages to the subject block bound by Peats Ferry Road, Station Street and Coronation Street. As Figures 5 and 6 show, the edge condition and the consistent street alignment are strong components of the character of the precinct. Other contributory elements to the local character are the individual narrow shop fronts, the vertical rhythm of individual frontages with varying parapet heights, continuous awnings and activated store frontages.

These elements add to the 'fine grain' character of the conservation area. It is important to note that this is different to the individual heritage value of the existing buildings. While the subject site may not contain any significant heritage items identified for retention, as shown in Council's Heritage and Façade Retention Plan, the existing street edge relationship, narrow 'fine grain' shop fronts, and consistent street wall height as well as the provision of a continuous awning are integral elements contributing to the existing character of the precinct. The existing buildings on the subject site contribute to the local character albeit the absence of heritage significance in that they form part of the established and traditional development pattern, which contributes to the continuity of the pedestrian experience, the retention of the human scale, provide built form transition and enhance public safety through the activation of the streets.



Figure 5_ Street edge along Station Street



Figure 6_ Active edges along Coronation Street

The proposal has deliberately chosen to depart from the existing character and ignore the contributory elements to the existing local character. With the introduction of varying setbacks at the ground floor, the introduction of an anomalous footprint to the existing street edge alignment and the lack of a defined street wall height, it is GMU's opinion that the proposal will fundamentally change the built form character of the block and of the precinct. The proposal fails to respond to the existing 'fine grain' character of the site and the street. The proposal will replace 9 individual frontages along Peats Ferry Road and 7 narrow individual shop frontages along Station Street that are built to the edge with levelled entries from the street.

The proposal will replace the existing character with an open alfresco area underneath a colonnade along the southern end of the property facing Cenotaph Park, a large transparent atrium/ foyer to the residential tower in the Middle Building and a Winter Garden partly open to the sky toward the Northern Building. The Applicant's Urban Design Report (page 21) states that "the ground floor area is to be clad in clear glass opening views from the rail station entrance through the site". The proposal is deliberately creating a "physically and visually permeable ground plane".

This is a significant departure from the existing predominant edge condition that will still be present in the rest of the subject block. If the proposal is approved in its current form, it will erode the continuity of the pedestrian experience that currently exists along all edges of the block and across Peats Ferry Road. While the existing controls envision amalgamation to facilitate development, the draft DCP amendments also require "zero building setback to main streets to promote active frontages and create an engaging pedestrian experience".

The Site Plan (AR-00) shows an alfresco area located underneath a colonnade along the majority of the frontage to Peats Ferry Road and Station Street, which further set back the activated frontages from the boundary. Above this are irregularly shaped floors (up to Level 5) followed with more rectilinear floors (levels 6-24). Due to the lack of consistent setbacks at the ground level and/or the presence of a defined street wall height, the tower, in fact, appears to overhang above the ground floor as monolithic point form tower without a defined base, main body and top. In fact, the proposed building envelope as shown on Levels 1 and above, show the perimeter of the tower touching the edges of the boundary on numerous locations. As a result, the proposed built form will have an overwhelming bulk and scale to the street due to the extent of the massing that extends to the edges of the site without any built form transition. Due to the lack of setbacks above podium, the proposal does not benefit from a demarcated street wall height which generally assists in creating a 'human scale' to the street and more recessive towers above.

The effect of this is a departure from the established streetscape on both sides of Peats Ferry Road. The existing lower scale (1-2 storey) street wall height plus parapet on the western side of Peats Ferry Road will not be balanced with a similar built form across the street on the subject site. Instead, the lack of an identifiable street wall or podium will lead to an unbalanced streetscape dialogue, where the 2 storey heritage buildings across the street will face a 25 storey building on the subject site. The lack of podium or setbacks above podium will result in a very imposing bulk and scale along the edges of the site, which is a departure from the predominant character of the precinct.

The Applicant's Urban Design Report acknowledges that the "Urban Design Analysis that accompanied the Planning Proposal, which informed the revised Structure Plan for the Precinct (Area 8) concluded that "the character of the precinct should be retained through significant façade retention and reuse". The absence of any heritage buildings within the boundaries of the subject site may deem the retention of the facades unenforceable and even impractical. However, the erosion of the edge condition of the site by the lack of a consistent and continuous street wall height and/or predominant street alignment should not be the outcome of the redevelopment of the site. While the individual facades are not scheduled for retention, any future development should respond sensitively to the existing predominant street alignment and street wall height, which are important elements of the local character.

The Applicant's Urban Design Assessment (page 11), describes the departures from the setback and built form guidelines as 'minor' and it argues that the "project has been designed to be generally capable of being consistent with the principles of the Peats Ferry Road Conservation Area, which predicated "respect for and celebration of the Federation and Inter War period streetscape" – extant "historically and socially significant...examples of the earliest commercial precinct in Hornsby". It is GMU's opinion that the proposal does exactly the opposite. The total departure from the existing streetscape in terms of street wall height and predominant alignments will undermine and irreversibly erode the character of the block and precinct.

The way in which the proposal has "addressed heritage issues and streetscape constraints" is a key matter that the consent authority needs to take into account when considering whether the proposal exhibits design excellence. According to Clause 6.8 – Design Excellence, which applies to any development with a height of more than 29.6m, "development consent must not be granted... unless the consent authority considers that the development exhibits design excellence".

In determining this, the consent authority also has to consider how the development addresses “street frontage heights” (Clause 6.8 (4), (f), vi) and achieves “appropriate interfaces at the ground level between the development and the public domain” (Clause 6.8 (4), (f), xi). It is GMU’s opinion that the proposal has not adequately addressed the predominant street frontage heights nor provided an appropriate interface with the public domain at the ground level, which in turn compromises the heritage character of the precinct. Therefore, the proposal’s departure from the predominant streetscape alignment not only erodes the heritage character of the precinct but also prevents the proposal from achieving the levels of design excellence expected for a development site or ‘key site’ of this scale, location and level of importance.

2.2 Overall bulk and scale

As shown in Figure 7, the overall massing of the proposed tower is overwhelming in scale. This is in part due to the lack of adequate setbacks, the proportions of the tower i.e. building depth to height ratio, and the extent of proposed development. The overall proportions of the tower do not exhibit the expected levels of design excellence as the proposed massing is not representative of an elegant tower form with slender proportions. GMU estimates that the ratio of the base to height is 1.43:1 under the most favourable estimate. For the proposal to achieve a more slender proportion the height will have to be at least three times the width of the proposed base (3:1), which will contravene the current applicable height controls. An alternative option is that width of the tower is reduced accordingly to relate better to the height of the tower. The extent of the perceived bulk and scale prompts the question as to whether this site will be better served by two slender towers of different heights or a completely different approach to the massing.

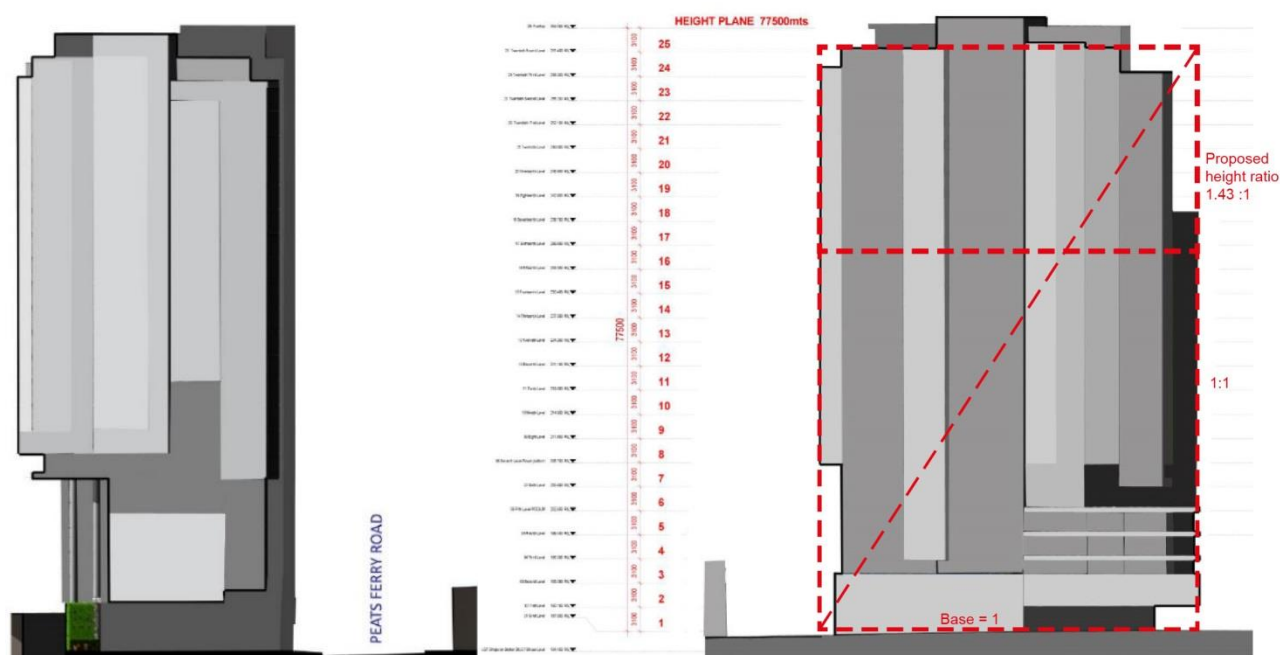


Figure 7_Building Envelope - Northern View (left) and Peats Ferry Road View (right) (Adapted from Ezzy Architects)

The tower achieves a better proportion as seen on the Northern View (see Figure 7); however, it is important to note that this is a straight on view and it is not representative of the dynamic nature of towers which can be seen in the round. This will be very much the case with the proposed tower as it is earmarked to be the tallest built form in the precinct and it will have uninterrupted views from the south above Cenotaph Park. The proposal is further affected from this vantage point by the fanning effect of the triangular site and the proposal’s lack of setbacks above the ground floor. In essence, the depth of the tower is ever increasing as seen from south to north. Proposing the bulk of the tower to be built to the edge of the boundaries on both street frontages increases the perception of depth as the tower does not have a consistent depth throughout. The proposed triangular shape increases the perception of bulk and scale as seen across both streets as well as from medium and long distance views.

This is a condition that may worsen over time as surrounding sites are redeveloped and the proposed tower is seen against the backdrop of the desired future built forms envisioned in the West Side Precinct – Building Height Plan. Therefore, slender proportions are even more critical when considering additional future development on the surrounding sites as the lack of adequate proportions, setbacks and a slender built form may contribute to the erosion of view and light corridors. This also can contribute to the perception of a continuous wall of development, which will not be a positive outcome.

The Applicant has provided illustrative future building envelopes in the form of wireframe envelopes over actual photographs; these demonstrate the extent of the potential visual impact of the proposed envelope from a number of public domain vantage points. Unfortunately, the illustrations show the extent of the bulk and scale and how it would form a wall of development. This is particularly evident in View C, which shows the tower with no view corridors to either side as it blends with other development in the background.

The maximum height control applicable to the site is 77.5m, the SEE stated that the proposal is within this height limit. However, upon close review of the Rooftop & Ground RLs, the proposed development is approximately 80.05m (at RL 264.5 & RL 184.45 respectively). This exceeds the limit by 2.55m. The important issue to note is that despite its greater height above other future development in the vicinity, the proposal lacks a recognisable roof form and does not make a contribution to the skyline. Other visualisations provided by the Applicant (See Figure 8) are artist's impressions taken from higher vantage points, which are more flattering viewing angles to the development; even then, these images show that the proposed articulation along the facades in the form of recesses or breaks in the façade are not sufficient to ameliorate the overall perception of bulk and scale.



Figure 8_Artist's impression (Courtesy Ezzy Architects)

According to Clause 6.8 – Design Excellence (applicable to any development with a height of more than 29.6m), “development consent must not be granted ... unless the consent authority considers that the development exhibits design excellence”. In determining this, the consent authority must have regard to how the development has addressed “bulk, massing and modulation of buildings” (Clause 6.8 (4), (f), v) “whether the form and external appearance of the development will improve the quality and amenity of the public domain” (Clause 6.8 (4), b) and “whether the development detrimentally impacts on view corridors” (Clause 6.8 (4), c). It is GMU’s opinion that the proposal has not successfully manipulated the bulk and scale to achieve a slender proportion nor the proposed modulation assists in breaking the overall massing. As a result, the proposed massing is bulky in appearance, which can have adverse visual impacts as seen from the public domain and contribute to the reduction of view corridors. Therefore, the proposal does not achieve the expected levels of design excellence for a development site with the levels of visibility and prominence as the subject ‘key site’.

The allowable FSR control on the site is 3:1. However, as the proposal is within Area 8 as identified in HELP and has provided “shop-top housing”, higher FSR is permissible and will be assessed based on design merit. Based on the number of departures from the built form guidelines in the controls, it is GMU’s opinion that the proposal does not exhibit sufficient merit to be granted any additional FSR. The non-compliances with the applicable built form guidelines are also accompanied by a number of non-compliances with the recommended ‘Rules of Thumb’ in the RFDC. The proposed (glass to glass) depth of the tower along the northern building is in the order of 27m. This surpasses the recommended building depth by the RFDC by 9m, which is 150% increase above the recommended depth.

The proposal also contravenes the recommended separation distances and assumes a lower level of development at No. 23-23A Station Street. The suggested amalgamated pattern by Council for the subject site includes the property at No. 23-23A Station Street (DP13812). No. 23-23A is immediately adjacent to an access lane along its northern boundary, which means that this site will result in an isolated site as it will have limited opportunities to amalgamate with other sites to the north due to the existing access laneway. The positioning of the tower for the typical levels 11-17 is proposed almost to the boundary, which assumes no redevelopment potential at No. 23-23A. While the redevelopment of that site may be limited, the proposal dictates a form of development on that site by stepping back up to level 7 and coming as close as 0m to the common boundary for Levels 11-17. It is GMU’s opinion that the proposal is maximising its development potential at the expense of the amenity of No. 23-23A as Levels 11-17 borrow amenity over the adjacent site and do not provide the recommended separation distance as per the RFDC.

According to Clause 6.8 – Design Excellence, the consent authority must have regard as to how the proposal addresses the relationship “with other development (existing or proposed) on the same site or on neighbouring sites in terms of separation, setbacks, amenity and urban form” (Clause 6.8 (4), (f), vii). Due to the lack of adequate separation distances with No. 23-23A at Levels 11-17, it is GMU’s opinion that the proposal has not carefully considered its relationship with this adjacent property nor has it demonstrated how that property can actually redevelop on its own or as part of an amalgamated site along the subject site’s northern boundary.

The Applicant’s Urban Design Statement (page 25) states that the proposal “has been designed to be generally consistent with the built form and scale of development envisaged in the Draft DCP” and the Stage 1 – Amendment Building Envelope and Footprint provides envelop comparisons with the indicative building envelopes included in the Draft Structure Plan for the Hornsby West Side Precinct by JBA. As shown in Figure 9 below, there are significant departures in the proposed built form from that of the massing diagrams included in the Draft Structure Plan, which lead to a significant increase in bulk and scale than that envisioned by that analysis.

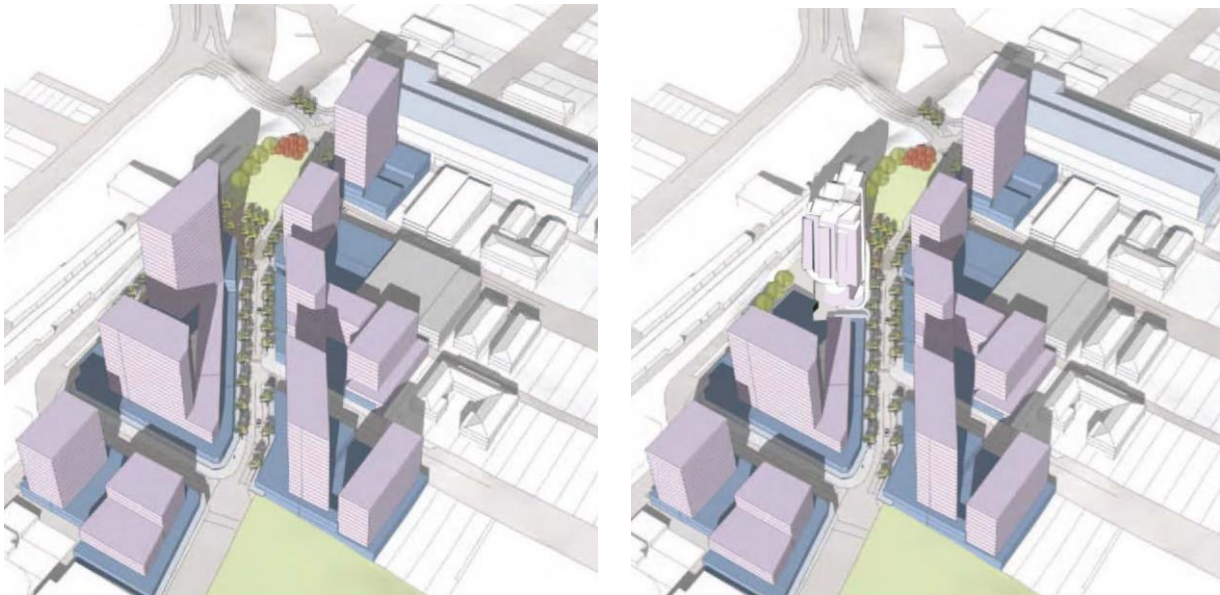


Figure 9_ Indicative Building Envelopes - Structure Plan (left) and the applicant's (right) adapted from JBA

The most significant departures include a lack of podium and tower typology. The Draft Structure Plan suggested slim towers of a consistent depth along Station Street, while the proposed built form increases in depth along both site frontages. The resulting form has a very wide rear elevation facing north and a greater perceived depth when seen from Cenotaph Park due to the ever increasing triangular shape.

The indicative massing in the Draft Structure Plan suggests a lower scale form along Peats Ferry Road and deeper setbacks for the tower above the podium. This would provide greater built form transition to the lower scale character across the street on Peats Ferry Road. The lack of setbacks erode the opportunity to provide a lower scale edge and create the effect of an overhanging building form above the ground floor.

HDCP 2013 requires 6m for upper storeys and Figure 7 (page 16) of the Applicant's Urban Design Assessment shows that the proposal provides 0m setback at least on 7 points along Peats Ferry Road with other setbacks ranging from 3.3m to 15m. The proposed setbacks to Station Street show at least 7 points where the elevation comes to the boundary (0m) with other setbacks ranging between 3.0-4.0m. This is contrary to the setbacks above street wall height, which is an archetypal characteristic of the indicative building envelopes shown in the Draft Structure Plan (page 3).

Based on the departures from the built form guidelines, the lack of adequate setbacks and the increased perception of bulk and scale generated from the triangular form, the proposal does not reflect the built form envisioned by the applicable controls, its objectives and/or the urban design studies that laid the foundation for the formulation of the existing applicable controls. The resulting proposed massing lacks an adequate proportion, does not exhibit a slender ratio and does not transition well to the lower surrounding development. The alternative proposed form does not result in a better design outcome nor reflects the objectives of the existing controls.

2.3 The proposal's interface with the existing public domain and Council's Landscape and Public Domain Plan

The existing context around the subject site is characterised by a lower scale heritage character with a distinct street wall height at the corner of the site. The pedestrian crossing directly from the station is in axis with the heritage building on the western footpath of Peats Ferry Road. As shown in Figure 11 below, the edge of the site frames the view to the “red” discount chemist building and the Odeon Theatre building, which is a memorable sight upon arrival by train. The proposed curvilinear lower levels increase the setbacks to Cenotaph Park approximately by 6-8.6m and may lead to a greater aperture to the buildings across the street. This is seen as a potentially positive outcome; however, the way the façade has been articulated and the suggested elevated plinth structure (assumed by the number of steps shown in the Applicant's Site Plan – Drawing AR-00), the proposal will lead to the erosion of the containment around the park, which already is disconnected from the predominant pedestrian flow as seen in Figure 12.



Figure 10- View of site from Cenotaph Park



Figure 11- View of site from Hornsby Train Station

It is GMU's opinion that the indicative change in level is unwarranted as the existing shops have levelled access responding to the generally flat topography. A rise in the level of the ground floor is contrary to the local predominant character where all the shops have universal access directly from the street. This will further segregate the park from the rest of the block and divert the non-able pedestrian traffic around the plinth instead of underneath the colonnade, which is contrary to the objectives of opening the space and increasing the setback.

This is not merely a stylistic concern; the edge treatment, containment of the open space and relation to the levels of the public domain need to be carefully studied. Innovation can be delivered at the upper levels in the form of an iconic tower, but the retention of the character at the lower levels is paramount.



Figure 12- View due south of Cenotaph Park



Figure 13- View of the Bus interchange to the east of Station Street

A critical issue of the proposed bulk and scale on the immediate surrounding public domain is the potential overshadowing of Cenotaph Park at lunch time. As stated in the Applicant's Urban Design Assessment (page 21), the "tower will overshadow the Cenotaph Park at 12:00pm in mid-winter". This is a critical adverse impact as the solar amenity of the park is critical around lunch hours when local workers and commuters are likely to use the park. Testing of the overshadowing impacts should inform necessary reductions in bulk to achieve a more skilful design and maintain the solar amenity to a great extent of the park around lunch hours.

Another part of the proposed ground floor interface that will be affected by overshadowing impacts is the northern winter garden. The location of this space to the north of the proposed tower is estimated on solar access levels without considering any future development on the northern properties. This area is also going to be potentially affected by 'wind-wash' due to the lack of proper setbacks. The level of deep soil provision is not known as the documentation provided does not include indicative car parking levels. This is a significant issue as the lack of mature trees within this space will contribute to a harsher environment due to the lack of vegetative and landscape softening. The ability of any plantings to thrive despite the poor soil provision and potential 'wind wash' is questionable.

As shown in the Applicant's Site Plan AR-00, the driveway to the basement car parking levels will be located at the North East Corner (Lower Ground Level) facing Station Street. This is not a positive outcome as the extensive driveway will deactivate a large segment of the frontage to Station Street and prioritise vehicular over pedestrian traffic.



Figure 14_Vehicular Entry (Courtesy of Ezzy Architects)

This is a poor outcome when considering that the proposal has not taken advantage of the access to the rear laneway. This is in part exacerbated by the failure to amalgamate with No. 23-23A. The inclusion of that site would have ensured a consolidated entry point that would limit the vehicular flow away from the main pedestrian routes out of the station. As shown in Figure 14, the treatment of the oversized vehicular entry point presents as a cavernous under-croft area that does not respond to the predominant existing alignment and street wall height. The image also does not show how it would respond to Council's Landscape and Public Domain Plan (See Figure 15).



Figure 15_HDCP – Landscape & Public Domain Plan

The location of the vehicular entry further south and away from the existing laneway will compromise future plans to limit vehicular traffic closer to the pedestrian exit from the station and to divert private vehicles away from the future pedestrian link with Cenotaph Park. The proposal in its current form will lead to a number of adverse outcomes to the public domain and to Council's future public domain improvements planned for the area. The proposal will contribute to the erosion of the containment around Cenotaph Park and the predominant street alignment, with the introduction of significantly different setbacks, large vehicle entrance and elevated frontages. The proposed bulk and scale will overshadow the public open space to the south of the site during lunch hours and it would potentially create a 'wind wash' effect to the proposed winter garden to the north of the tower. The proposed vehicular driveway and under-croft arrangement is uncharacteristic of the local precinct and will potentially interfere with Council's plans to limit pedestrian-vehicle conflicts across the station.

In determining whether the proposal exhibits design excellence, the consent authority needs to have regard as to whether the proposal has addressed the "impact on, and any proposed improvements to, the public domain" (Clause 6.8 (4), (f), x), and any "environmental impacts" such as "overshadowing ...wind" (Clause 6.8 (4), (f), vii) and "vehicular and service access" (Clause 6.8 (4), (f), ix). It is GMU's opinion that in this regard, the proposal has failed again to demonstrate the expected levels of design excellence as a number of the proposed arrangements have the potential not only to adversely impact the existing relationship of the site with the immediate public domain, but also to disrupt some of Council's planned improvements to the public domain.

3 Conclusions and Recommendations

Based on the above assessment, it is GMU's opinion that the proposal will result in a number of adverse outcomes for the precinct, conservation area, local character and Council's future landscape and public domain plans. GMU strongly recommends that the proposal be amended to address the issues discussed throughout this report before any consideration for approval. The main issues found include:

- Departure from the existing character and lack of contextual fit with the contributory elements to the existing local character
- Introduction of varying setbacks at the ground floor
- Introduction of an anomalous footprint to the existing street edge alignment
- Lack of a defined street wall height
- Fundamental change to the built form character of the block and of the precinct
- Failure to respond to the existing 'fine grain' character of the site and the street
- Erosion of the continuity of the pedestrian experience that currently exists along all edges of the block
- Creation of an unbalanced streetscape dialogue with the 2 storey heritage buildings across the street
- Introduction of a monolithic point form tower without a defined base, main body and top that displays:
 - o Overwhelming bulk and scale to the street
 - o Lack of adequate setbacks,
 - o Poor proportions
 - o Increased building depths
 - o Inconsistent depth throughout
 - o Perception of over-development
 - o Contravention of recommended separation distances
- Increased perception of bulk and scale and visual impact from short, medium and long distance views
- Erosion of view and light corridors
- The perception of a continuous wall of development
- The lack of a recognisable roof form and a contribution to the skyline
- Potential site isolation at No. 23-23A Station Street
- Adverse outcomes to the public domain and to Council's future public domain improvement plans
- Erosion of the containment around Cenotaph Park and the predominant street alignment
- Large vehicle entrance and elevated frontages
- Overshadowing of the public open space to the south of the site during lunch hours
- Potential 'wind wash' effect to the proposed winter garden to the north of the tower and surrounding public domain.
- Uncharacteristic vehicular driveway and under-croft arrangement
- Potential pedestrian-vehicle conflicts across the station
- Inability to meet the objective of Council's Design Excellence control, which is to "deliver the highest standard of architectural and urban design" as the proposal has poorly addressed the following design aspects considered under Clause 6.8 – Design Excellence:
 - o "street frontage heights" (4), (f), vi
 - o "appropriate interfaces at the ground level between the development and the public domain" (4), (f), xi
 - o "bulk, massing and modulation of buildings" (4), (f), v
 - o "the form and external appearance of the development" (4), b
 - o "impacts on view corridors" (4), c

- “relationship with other development (existing or proposed) on the same site or on neighbouring sites in terms of separation, setbacks, amenity and urban form” (4), (f), vii.
- “impact on, and any proposed improvements to, the public domain” (4), (f), x
- “environmental impacts” such as “overshadowing ...wind” (4), (f), vii; and
- “vehicular and service access” (4), (f), ix.

Due to the proposal's inability to meet the objective of Council's Design Excellence criteria and the number of adverse urban design and built form outcomes, it is GMU's opinion that only a complete redesign of the proposal will address the number of issues discussed above and throughout this report.