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ARCHITECTURE + INTERIOR DESIGN

BACHELL AVENUE RFI LETTER – REVIEW AND FEEDBACK **30th SEPTEMBER 2024**

The following document has been prepared in response to the Design Excellence Panel meeting minutes issued for the presentation made on the 19th of June 2024. It is also in response to Cumberland Council's Request for Further Information for Development Application DA 2023/0775 dated 30th July 2024.

Two Form Architects, as the Project Architects are the author of this response, namely Kristina Mitkovski, NSW registered Architect (no. 7998).

CUMBERLAND DEVELOPMENT CONTROL PLAN

Item 1: Part C of the Cumberland Development Control Plan (DCP), sub-part 3.5, C4 requires that signage shall be minimised. Clarification is sought on the number of signage along the front façade, will the 'Type 1' sign be located to each brick column facing Bachell Avenue.

Refer to the updated signage plan, DA650, clarifying the number of proposed signs along the façade. It also confirms that the Type 1 sign will be located at each brick column.

It's noted that the signs are proposed signage zones, and the individual signage design is subject to a separate application.

Item 2: Part C, sub-part 3.8 ceiling height, C1 requires a minimum finished floor level (FFL) to finished ceiling level (FCL in a commercial building, or the commercial component of a building, to be as follows:

- 3.5m for ground level (regardless of the type of development); and
- 3.3m for all commercial/retail levels above ground level

We recognise the DCP requirement for floor to ceiling heights in commercial buildings. We acknowledge that while this is a mixed use building, it does contain some commercial elements. We have considered the height requirements put forward by Council and in response, have increased the floor to floor heights in the building.

We propose to provide a ground floor to floor height of 3.9 metres with a floor to ceiling height of 3.5 metres. This complies with Council's expectations. For the other floors we propose a floor to floor height of 3.3 metres with a floor to ceiling height of 2.7 metres.

We recognise that the upper levels do not meet with Council's expectations of floor to ceiling height. Our reasoning for proposing a lower floor to ceiling height than Council expectations is based on providing a more environmentally sustainable development. While a higher ceiling can be viewed as generous it creates a 30% additional air volume that needs to be conditioned. This air volume is well above the head of building users and presents a significant energy cost to the building with little real benefit to users.

In response to one of the Objectives regarding ceiling heights, we can provide that the objective of future flexibility is satisfied for all commercial suites on the site. Flexibility is assigned equally to the smaller tenancies as they are to the larger suites. The floor to floor height of 3.3 metres does not limit the commercial uses of both small and large tenancies. It still provides area for services reticulation or an option to work with a partially exposed ceiling. 2.7m is a universally accepted finished ceiling height in a commercial tenancy and does not limit the use or amenity of the space.

There is also no limitation to the future flexibility or amenity as required under the Development Standard. A 2.7m finished ceiling is not atypical in commercial developments.

Development Standard Objectives achieved:

3.8 3.9 Ceiling height

Objectives: Ensure an acceptable level of amenity and future flexibility is provided for new commercial and residential developments. Encourage articulation of the façade of the building by variation in the ceiling heights of the various floors, which gives the building a top, middle and base

We note that the development complies with the NCC minimum room heights.

General Planning/Comments

Item 1: Some of the spaces identified as 'specialised retail premises' are not considered to be suitable or functional areas to meet the definition in the CLEP 2021. These include but not limited to tenancy AG.03 and BG.01, B1.03 and B1.04.
Further to the above, a 'specialised retail premises' may also require direct vehicular access to the site of the building or place by members of the public for the purpose of loading or unloading such goods into or from their vehicles after purchase or hire. The proposal does not appear to provide tenancies that would achieve this. Insufficient information has been provided as to the operation of the 'specialised retail premises'.

We have reviewed the design with consideration of Council's comments and made the following changes to the layout of these spaces:

- AG.03 has been removed from the proposal. The space is now allocated as a neighbourhood shop.
- BG.01 has been combined with BG.02 to create a larger space.
- BG.08 has been removed
- BG.09 on the ground floor has been removed
- B1.09 on the first floor has been combined with B1.06
- B1.05 has been divided and combined with B1.03 and B1.04

Finally we note that all specialised retail premises have covered access to lifts 1, 2, 3 and 4. Lifts 2 and 4 are goods lifts. These lifts offer direct access to loading bays; 1, 2, 3, 4, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16 and 17 as well as basement car parking spaces. This layout is consistent with specialised retail developments.

Item 2: Similarly as above, some of the workspace for the 'light industry' tenancies are not considered to be functional or adaptable spaces, for example tenancy B2.12. Access to BG.09 in adjacent to loading bay 14 and not a practical area for the tenancy for access, including safety for pedestrian access to this tenancy.

We have reviewed the design with consideration of Council's comments and made the following changes to the layout of these spaces:

- BG.09 on the ground floor has been removed
- Tenancies AG.05 – AG.13 have been reduced in size to create a wider driveway and a pedestrian route in front of the tenancies.
- Tenancies BG.05 – BG.07 have been reduced in size to create a wider driveway and a pedestrian route in front of the tenancies
- Tenancy AG.13 has been removed with the space allocated to tenancies AG.05 – AG.12.
- Tenancies B2.01 – B2.09 and B2.11 – B2.15 have been reduced in size to create a pedestrian route in front of the tenancies.
- B2.12 has been combined with B2.13.

Item 6: The solar diagrams provided do not accurately show the extent of shadows to be cast be the proposed building. Please provide shadow diagrams for the 21 June winter solstice between 8:00am and 4:00pm.

The updated architectural package incorporates the requested shadow diagrams.

Item 7: During the neighbour notification period, Council received one submission which is summarised below for your response and/or action.
The key points raised in the submission are:

- "... the number of levels which can block sunlight, cast a shadow and the visibility into windows for privacy for the owners and tenants across the road.".
- "..the large development will take time, truck traffic will increase, construction noise and dust or any other debris from construction will increase and degrade the environment for air quality and noise".

Point 1 – Regarding the overshadowing – refer to the drawing package. The proposal is of a scale and typology that was considered by council and exhibited as part of the previous planning proposal process. The scheme seeks to firstly improve the streetscape through the breakdown of its massing and its modulation. With the upper levels set back at the street wall and then with the higher building elements, they are set back even further.
The scheme's internal laneways and connectivity seek to present the majority of tenancies with an internal relationship and connection with the majority of the street fronted tenancies having dual frontages.

Point 2 – This is a construction management matter and reference to be made to the Planner's response

Built form, mass and articulation

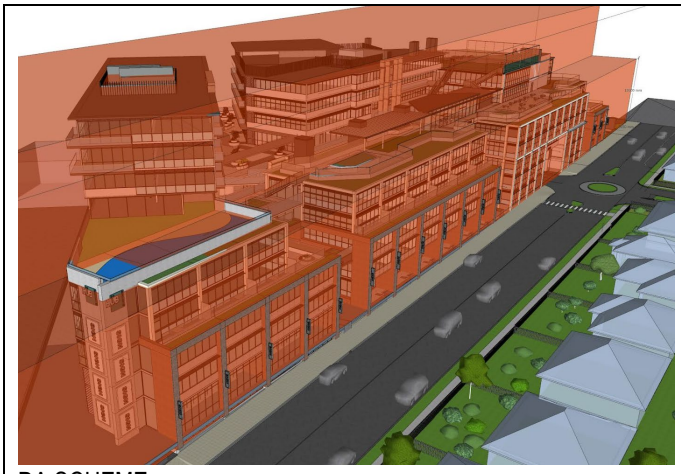
The proposed development exceeds the maximum permissible building height of 18m at Bachell Street. Further modulation of the mass to address this height requirement is required, stepped setbacks to Bachell Street will promote a more harmonious relationship with the surrounding context.

The proposal as submitted identified 4 height breaches to the 18m height limit. Those relating to the setback taller building forms have been designed out. The parapet to the fifth storey still poses as a minor exceedance. The proposal as submitted already sets back the fourth and fifth storey to the majority of the Bachell avenue frontage, along with the designed modulation, provide a more harmonious relationship with the surrounding context.

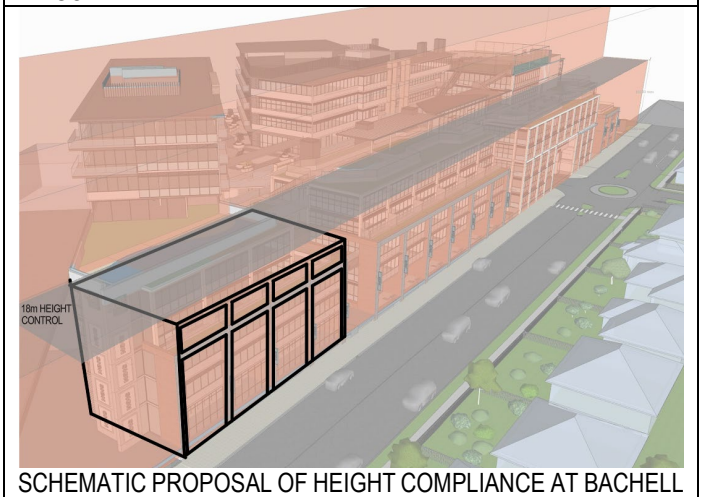
Please design height breaches out of the proposed design – there is no clear reasoning behind why these are required.

The proposal as originally submitted, and as amended by the updated architectural drawing set identifies minor exceedances to the height control, which is 18m for the first 12 metres, and 32m for the balance of the site. The height can be considered as a function of the ground floor RL, and the upper floor massing.
The ground floor RL is established by the flood constraints of the site, and therefore cannot step down to follow the fall of the site, which is approximately 4.5m along the Bachell avenue frontage.
The design consideration of the upper floor massing was to present a repetitive lower scaled form to Bachell avenue, and the taller form recessed from the Bachell avenue frontage. The Bachell avenue fronted massing is further modulated by recessing the fourth and fifth storey.

The proposed design response can be considered a better outcome than a fully compliant outcome, when the following diagrams are considered.



DA SCHEME



SCHEMATIC PROPOSAL OF HEIGHT COMPLIANCE AT BACHELL AVENUE

The adjacent image demonstrates the stepped height control planes of 18m for the first 12m into the site then 32m for the rest of the site

It can be seen that the step back at levels three and four is a far better design outcome than if the scheme complied with the height control of 18m high for the first 12m without a set back (refer below)

The proposed FSR of 3.21:1 exceeds the maximum permissible FSR of 3.0:1.

Refer to the updated architectural drawing set for the updated FSR.

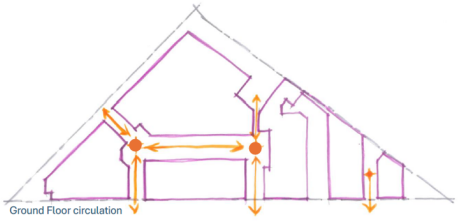
Describe the massing of the development what strategy have been deployed to allow daylight into the central courtyard. There is a risk this space will be dark and windy.

The central courtyard is akin to a laneway and is punctuated by the separation of the buildings at ground level and this thereby provides opportunity for natural light and ventilation. In addition, being open air there is no impediment to light access from above. This space works as a transition between buildings and is an important circulation area for the development. By offering it as an area to hold community activities as well as appending it to the retail offerings on the ground floor, its use is extended from that of merely a pathway. Daylight penetration to the pathway is continuous throughout the day and for direct solar access, there are other areas on the site that offer this and are publicly accessible. Full solar access is offered on the roof level that is accessible to the public and they are encouraged to engage with the garden, eatery and other recreational activities on offer.

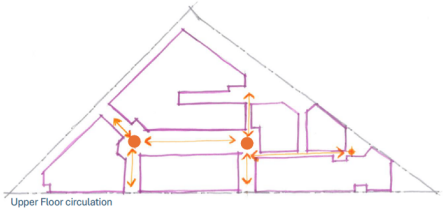
Layout of uses is generally ad-hoc and confusing- it lacks integration between uses and with the local area. Consider how someone visiting the development will want to move around and design to make it as easy (and efficient) as possible. The layout of light industrial uses appears odd – 'back of house', disconnected from the development, yet demands expensive ramp infrastructure to access Level 2. Is there a reason why these uses can't be all on ground floor?

The location of the light industry along the northern boundary at ground level and to the east at the rear is a deliberate positioning to demarcate the activities associated with the light industrial use. With the relocation of the stormwater culvert underground and along the northern boundary, the light industry is ideally located here. The larger vehicular access required for the use is separated from smaller vehicular movements along with the activities associated with this use – being greater vehicle movements, loading and unloading and potentially some noise impact from the businesses associated with these units. This location should be considered as the safest location for the light industrial use and is a considered siting in the context of the other uses in the development. Integrating it or bringing it closer to the front of the site will have a detrimental impact on the other more pedestrian accessed uses.

Continuing the light industrial use onto level 2 follows through with the ground floor concept of locating this use to the rear of the site for many factors including noise attenuation, pedestrian safety and safe vehicular movement responding to this use. To locate this use entirely on the ground floor would cluster the units closer to the pedestrian focussed uses and the outcome would be detrimental to the amenity of the ground floor



GROUND FLOOR - VERTICAL CIRCULATION NODES SHOWN AS CLEARLY VISIBLE UPON PEDESTRIAN ENTRY POINTS AND ALSO THROUGH CIRCULATION ZONES



UPPER FLOORS - VERTICAL CIRCULATION NODES SHOWN AS CLEARLY VISIBLE UPON PEDESTRIAN ENTRY POINTS AND ALSO THROUGH CIRCULATION ZONES

The development is comprised of several uses. Many of these are set up to operate independently dependant on the user's familiarity with the precinct. In order of ease of wayfinding for a visitor these operate in the following way:

- Food and drink industries; These are the most publicly facing of the services offered by the facility. The primary facing will be to the central courtyard with secondary outdoor seating toward and activating the street.
- Specialised retail premises; will draw people further into the facility. Located predominantly on the first two floors with a signature four storey space on the northeastern corner, these areas surround and activate the central courtyard.

- Health and community services; operates predominantly as a stand-alone facility with its own street frontage. While opportunities for internal connection exist in the basement and at upper levels, the medical precinct will operate somewhat independently.
- Shared services including:

  Gym;

  Child care centre

  Doggy day care;

  Self storage;

- Will cater to users more familiar with the precinct. While signage and visual cues will reinforce wayfinding opportunities.
- Office space; Like any office visitors will either be escorted or having arrived with directions to a particular lift core.
- High Technology industries; These will rely on regular users with guests being either escorted or having arrival with directions to a particular lift core.
- Work spaces/light industry; These areas are not intended to interact with the rest of the building. They operate as stand alone workspaces to support smaller companies that need a workspace prior to delivery of products or attending worksites.

Location of day care on level 5: Likely to have different hours of operation to the rest of the development – how will access be controlled? Lifts to Level 5 are somewhat hidden. How do parents with prams access the ground floor/lifts? Appears to be stairs at each approach. Where is the parking for parents to stop and drop? Question the inclusion of movement corridor as part of the 7sqm play space. Play space at the southeast will be in shadow most of the day.

Access to the daycare will be secured via pin code or security passes as is the norm for child care centres. The lifts to level 5 are not hidden, rather they are positioned within a weather protected alcove that is known to the people working and accessing the commercial uses housed in the building along the northern boundary. Pedestrian access to the lifts is via a safe pedestrian pathway part of the central courtyard circulation space. There is a pedestrian entrance to the site from Bachell Avenue located closer to this building with a ramp adjacent to the stairs providing a continuous accessible path to the lifts for both prams and wheelchairs.

Car parking is designated for the child care centre use under the building and there is a designated lift for access.

Access to the childcare centre will be by lift. Two lifts connect the childcare lobby with the ground floor and the childcare parking area in the lower ground floor. Access from the level 5 lobby will be controlled by staff. Prior to opening times the lift will only access level five with swipe cards. After opening times, the lift will provide access to the lobby. Lobby doors will also be locked until opening times.

The lifts cores at either end of the courtyard are identified by 16 metre high feature portals. We are of the opinion that these will accentuate the location of the lifts as they present as vertical elements naturally suggesting a vertical movement. Further, childcare users will generally be familiar with the facility and know where lift lobbies are located. Within the basement, the lift lobby will sit within the dedicated childcare parking zone and be identified with signage.

The facility does not offer stop and drop facilities. It has a dedicated parking area in the lower ground floor as well as graded pedestrian access from Bachell Avenue.

The outdoor space to the west of the childcare centre is three metres wide. This is adequate for a reasonable area to play and is not a movement corridor. It is ideal for quieter, more focussed play with the raucous active running and riding activities provided for at both ends of the centre.

The south east play space will still receive a generous amount of sun. Refer to shadow diagrams, keeping in mind that a portion of the outdoor play is required to have sun shading per DET and ACEQA requirements.

Doggy daycare on Level 9. Is this an appropriate location given the only access is via shared lift? Also appears that there is no outdoor space.

It is an appropriate location for this segregated use. Referring to the architectural plans, the doggy day care has two outdoor exercise yards. The location is very appropriate given there is no integration with other uses on the site and also acoustically, dogs bark, and there is no negative impact to the other users of the site. We are of the opinion that this use is appropriately located as a destination rather than integrated amongst other commercial uses.

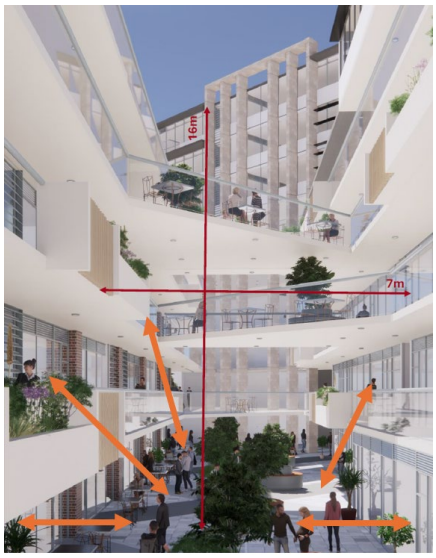
Doggy daycare patrons will be asked to use the goods lift exclusively with a warning to other patrons warning that the lift may be used for transporting dogs. Dogs in the lift (and whilst on the site) will be required to be on leash and under the control of owners. Owners will also be responsible for informing operation management immediately if lift cleaning is required due to animals excreting waste in the lift. Item 13.13 has been added to the PoM to reflect these requirements.
This use has significant outdoor space set aside for exercise. Please refer to drawing DA.111 which identifies two large outdoor exercise areas.

General orientation of built form will preclude solar access to the plaza area at ground floor.

Light studies have been undertaken in the design development of the laneway and these studies demonstrated that there is light access available to this lower level. Full solar access is encouraged on the roof level where public and building user activities and amenities are provided. The laneway will act as an extension to the businesses on the ground/street level (mainly food retail businesses) and for occasional community celebrations and markets. There are significant precedents of such a concept that are successful without solar access throughout the day (consider Pitt Street Mall for the most part of the day). The courtyard's success is in its bringing together of the local community and building users. It will be a vibrant nucleus of the site with its energy and activity resonating. Being the main circulation area on the ground floor, most if not all visitors to the site will make a connection with this space. Therefore, its success is in its capacity to bring people together within the development.

Plaza concept, whilst noted as an attempt to create an integrated design, will create issues for safety. Passive surveillance is not strong.

It's believed that passive surveillance is achievable as the majority of the retail units are double sided and there is activity to both sides of these units. There is also the vertical connection between spaces which maintains this courtyard as visible horizontally and vertically. Equally, the comment made above regarding the courtyard's bringing people together is applicable as a response to this comment.



ARROWS DENOTE ACTIVE AND PASSIVE SURVEILLANCE THROUGHOUT CENTRAL PLAZA BOTH HORIZONTAL AND VERTICAL

Security management will be difficult with so many different uses and hours of operation.

A comprehensive plan of management has been prepared to accompany this application. It captures management over the site and the varied uses.

STRUCTURE/BUILDABILITY/MAINTENANCE

Considering the difficult, triangular shaped site, clean, consistent structural system is recommended. The presented design indicates the need of transfer structure above LGF, however there are further structural misalignments on the upper floors as well.

We have undertaken a structural engineering review and incorporated the necessary requirements for a DA level documentation set.

The indicated 300mm wide columns in the basement are not realistic – in case of a 12 storey (3 basement + 9), with type A construction, considering all the load and the required fire rating the columns will be much wider than 300mm. As there is no tolerance left in the design, the 2600mm visitor spaces will be quite likely compromised. Early structural engineer involvement is recommended.

We have undertaken a structural engineering review and incorporated the necessary requirements for a DA level documentation set.

Over articulation of the courtyard circulation areas and building mass leads to poor weather protection and maintenance issues. Rain-water to be handled on open corridors – glass balustrades act as water-trap – open balustrades cause linear dripping/flowing of water.

Outdoor spaces will be provided with well designed drainage systems that will collect water before it becomes a hazard and channel it to the on-site stormwater system. Balustrades will prevent overflow into the areas below and outdoor perimeter walkways will be covered to provide all weather access to internal spaces.

The amenities / wet areas are scattered, not aligned. From a buildability / construction cost point of view well aligned wet areas would be beneficial.

The comment is noted and relevant amendments have been made to the architectural drawing set.

PARKING, CIRCULATION AND SERVICING

Ambulance access to medical use is not clear. The indicated corridor is about 1m wide, long corridor, which is not sufficient for stretcher or bed transport.

It is not envisaged that the medical uses will require bed transport. The provision of ambulance facilities are to futureproof the tenancies, not based on expected demand. The widest stretcher utilised by the NSW Ambulance service is 750mm (https://www.ambulance.nsw.gov.au/__data/assets/pdf_file/0010/552907/Stretcher-and-Vehicle-Dimensions-NSW-Ambulance.pdf) more than capable of being accommodated within the 1m corridor. Notwithstanding, the corridor width has been increased from 1m to 1.5m in width. It should also be noted that under the Australian Standard 1428.1 Design for Access and Mobility, a 1m corridor is dictated.

ACCESSIBILITY AND AMENITIES

The proposal lacks consideration of disabled access. Many stairs up into courtyards/units with no other access shown.

Every component of the site, each building is accessible via lift and there is ramp access off Bachell Avenue. The ground floor RL is established by the Flood Planning Level, therefore, direct access from the footpath needs to be via ramps and or stairs. Each tenancy which fronts Bachell avenue is afforded direct stair access to ensure activation of the frontage. However, a second, accessible entry is provided from the internal plaza.

Accessible entry is not provided for units AG.05-AG.13, BG.05-BG.07, BG.09

There is a designated pedestrian pathway to the AG series of units. A pedestrian entry door is provided adjacent to the roller door access and this will be designed in accordance with AS 1428.1. The loading zone to the south of the BG units can potentially provide a pedestrian collection area with a safe enclosed waiting area created for collection of goods. Access to this area is currently designed as accessible. Alternatively, it can be assumed, given the nature of how this area of the site is designed, that the main mode of access will be via vehicle, even for collection of goods and access to these services.

Drawings are not dimensioned, but either the ambulant toilets are too wide, or the normal toilets are too narrow. Please check.

These are amended in the updated architectural drawing set.

Door clearances to be checked. Accessible toilet behind BG.03, and behind B2.12 not compliant.

Door clearances have been resolved in the amended architectural drawing set.

Lift Lobby in front of Lift 1 and Lift 2 on GF to be checked – probably not stretcher compliant. Adjoining ramp clearances to be checked.

These have been amended please refer to architectural drawing set

DG.01 is not accessible.

These are amended in the updated architectural drawing set.

DG.01, D1.01 and D1.02 does not have access to toilets (separated by driveways)

The provision of amenities across the project have been revised in the updated drawing set.

DG.01, DG.02, D.101, D1.03 and D1.02 does not have accessible toilets provided

The provision of amenities across the project have been revised in the updated drawing set.

Clearances at the internal stairs are not compliant at CG.01-06

These have been amended in the updated architectural drawing set.

A2.01, A3.01, A3.02, D3.01, D4.01, A4.01 need another ambulant toilet.

These have been amended in the updated architectural drawing set.

Some of the units on L2, L3 don't have access to toilet. There are only two accessible toilets on the floor which is not enough toilets to serve the floor

These have been amended in the updated architectural drawing set.

All toilets recommended to be designed with door opening outward with a privacy wall or hand-wash lobby, otherwise lift-off hinges to be used.

Will be provided with lift off hinges detailed at the construction certificate stage.

D5.02 ambulant toilet and the accessible toilet not compliant.

These have been amended in the updated architectural drawing set

Sustainability and environment

The panel acknowledges the sustainability targets set for the project of 5.5 star NABERS energy and 2 star water rating and encourages further development of strong ESD principles for the project.

The proposal will comply with the ESD requirements of the NCC at the time of construction certificate.

Promising to see the consideration for the integration of good CEPTED principles.

Noted with thanks.

The rail corridor to the south of the site has the potential to provide borrowed landscape amenity to the development. Consideration should be made for this opportunity in the developing design.

The design developed the cutout courtyard as a response to similar pre-DA comments. the current amended drawing set has provided a setback at the lower levels of 1m to increase the opportunities for natural light.

What strategies have been adopted to account for the flooding risk on site

The ground floor RL is set by the flood engineering modelling. Refer to the report for a specific response.

How is the stormwater channel going to be managed? Have you met with Sydney water?

Yes, we understand the proponent has had ongoing discussions with Sydney Water.

Proposed deep soil zone not clear

The nature of development in the business zone differs from that in the residential zones. Due to the demands of the permissible uses, deep soil provisions are not typically considered. We understand that part C of the DCP echoes this sentiment and does not provision controls relating to deep soil.

Proposed canopy cover not clear

The nature of development in the business zone differs from that in the residential zones. Due to the demands of the permissible uses, canopy cover provisions are not typically considered. We understand that part C of the DCP echoes this sentiment and does not provision controls relating to canopy cover.

General approach to landscaping lacks consistency and reasoning (for example, why is the pavement criss-crossed? If assisting in wayfinding this makes sense but there is no correlation which is confusing)

Refer to landscape architect's response

Conflict of Infrastructure and Tree planting.

- The fire hydrant booster and gas meter has been placed in the deep soil are on the southern corner of the site which will conflict with one of the trees proposed in this aera. An alternative is to be assessed for the location of these items.

These have been relocated refer to architectural drawings

STREET ADDRESS

The primary street addressing mass clad in brick is an visually attractive, contextual and human scale response to the street frontage.

Noted with thanks.

There is a good rhythm to the street a facing elevation which is not evident in the taller buildings at the rear

The taller buildings to the rear are designed in response to the height controls and house a different use to the smaller street elevation buildings. The height of the rear buildings is beneficial to accessing views and daylight and also helps to vary the mass of the site. The design of the site never intended it to be developed with uniform height buildings rather it is designed to cascade to the street front with taller buildings not imposing on Bachell Avenue and its pedestrian and vehicle movement.

Understanding that the intention is that the ground floor tenancies are dual frontage, stairs and retaining walls at the street frontage are to be avoided. Review level of ground floor slab.

The ground floor RL is set at the flood planning level. Additionally, there is approximately 4.5m fall along Bachell avenue. Along CG.01 to CG.06, retaining walls are required to the outdoor seating areas, punctuated by openings to draw people into the tenancies, providing activation. At the point where a retaining wall would be the highest, along AG.01 and AG.02, the shopfront glazing is brought down to the footpath level, with the height transition occurring within the tenancy. This provides for a display along the frontage, appropriately acitivating this end of the development.

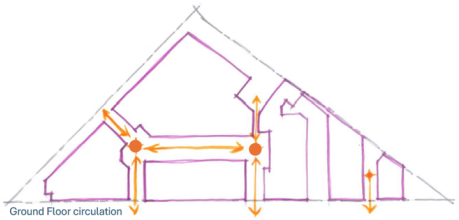
Min. 3m wide green front setback recommended

We are uncertain where this comment has come from as there is no DCP control requiring a 3m wide green setback.

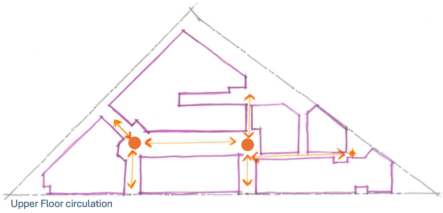
SITE ACCESS

Various entry points to the development will make it difficult for people to find their way into and around safely and conveniently.

This was encouraged in previous design reviews and the entry points are correctly located to address each portion of the site. Upon entry into the site, it does become clear where a visitor is to go and there will be a wayfinding strategy implemented to assist. The various entry points prevent congestion and provide two options – either provide the shortest access point to the building's uses directly adjacent to each entrance, or an opportunity to meander through the site and discover other areas. Various entry points spread the users out and leave no portion of the development ill considered.



- **GROUND FLOOR** - VERTICAL CIRCULATION NODES SHOWN AS CLEARLY VISIBLE UPON PEDESTRIAN ENTRY POINTS AND ALSO THROUGH CIRCULATION ZONES



- **UPPER FLOORS** - VERTICAL CIRCULATION NODES SHOWN AS CLEARLY VISIBLE UPON PEDESTRIAN ENTRY POINTS AND ALSO THROUGH CIRCULATION ZONES

We have designed the site to address and activate the street front. By providing several points of access we have avoided creating a long street front that turns its back to the street. We do not believe that creating several entries will be confusing, rather it breaks down the bulk of the development creating a street facade that feels like several buildings and creating an internal street network that will activate the different retail offerings.

Access is generally convoluted – long, winding and indirect corridors may be unpleasant and unsafe. Pedestrian pathways/access along the north east edge is not clear.

The nature of the development on the site is that it is a long site. The pathways have been considered in their shortest length with other paths coming off them strategically to access another area of the development. They have been designed in a way that connectivity is promoted vertically and horizontally. Any development of this size will be assisted by a wayfinding strategy and this one is no different in that respect.

The access way between the tenancy and ambulance bay at the ground floor seems too narrow to take a stretcher and will require review

Refer to previous response under 'parking, circulation and servicing'

PRESENTATION

Strong context study

Noted with thanks.

The legibility of plans, elevations and sections needs to be improved ahead of DA lodgement. Scale of annotations, levels, clear dimensions, hierarchy of colouring and hatches, presence of surrounding context.

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ARCHITECTURE + INTERIOR DESIGN

Drawings updated

North points, RLs, legends please

Drawings updated

TABLE SUMMARY

A. DESIGN EXCELLENCE		
Whether a high level of architectural design, materials and detailing appropriate to the building type and location will be achieved	The presented design, materials and detailing is high quality in their components, however altogether probably "over designed", due to the number of design languages combined into a conglomerate.	The risk with applying a homogeneous design response with the finishes and materiality is that a dull, repetitive development would result. The design response with The Hub provides a visually interesting development varying in scale and materiality. The finishes are also applied to suit the scale and typology of each of the buildings. By modifying the finishes throughout the site it also assists with wayfinding and supports good building identification from the street and also within the site
	The submitted material clearly shows that the design is in passionate and good hands to amend and fine tune the proposal.	Noted with thanks.
Whether the form and external appearance of the proposed development will improve the quality and amenity of the public domain	Min. 3m wide green front setback recommended	a 3m setback along Bachell avenue cannot be incorporated.
Whether the proposed development detrimentally overshadows an area shown distinctively coloured and numbered on the sun plane protection map	The proposal does overshadow its eastern neighbour. However, not significantly.	Noted.

B. HOW THE DEVELOPMENT ADDRESSES THE FOLLOWING

Existing and proposed uses and land mix	The development proposed a diverse mix of uses which has the potential to activate the area and promote multipurpose trips and extended dwell time. The panel considers this to be of potential benefit to the amenity area, however a more cohesive approach to planning for access, operation and safety needs development	The plan of management has been updated in response to both council and design panel comments. Access into and around the site is designed in response to many factors – urban design along Bachell Avenue, mobility for wheelchairs and prams, as visual markers throughout the site and segregation of pedestrian and vehicular access making the site safe for all users. We consider pathways through the site to be clear and open vertically and horizontally
Heritage issues and streetscape constraints	The site is not a Heritage item and is not located in a Heritage Conservation Area.	Noted.
The location of any tower proposed, having regard to the need to achieve an acceptable relationship with other towers (existing or proposed) on the same site or neighbouring sites in terms of separation, setbacks, amenity and urban form.	The composition of the proposal at the east of the site has a less successful relationship with the street. In the panel's opinion elements of this tower form are perhaps seeking to squeeze too much GFA out of the site and should be reconsidered.	The composition of the proposal to the east of the site is designed again as a cascade of height with opportunity for outdoor public areas facing Bachell Avenue located in the building set back. The interface with the street is active in both street frontage of the building being an identifier for the site and with public dwelling areas. There is a considered layering of the site at the street front to reduce the bulk of the development whilst promoting pedestrian circulation.
Bulk massing and modulation of buildings	Street frontage modulation is acceptable, rear massing is not ideal, too complex.	The rear of the site is designed, configured and massed in a way that allows for view and ventilation through the site. The rear massing is a considered design response to what its addressing – the rail corridor and open space. It further provides for elevated outdoor public dwell spaces much like what is offered at the front of the site
Street frontage height	The proposed development has a well conceived scale and relationship with the street. The ground floor level could be reconsidered to avoid stepped entries to the commercial tenancies from the street. The concern here is that the street frontage will become the secondary entry to these tenancies, with the mall facing entries becoming the preferred entry as it is step free. This would result in a poor interface with the street.	As discussed elsewhere in our response- the RL for the ground floor level is determined by the Flood Engineering report and consequently elevated entries into the tenancies from the street are unavoidable. It's the nature of the site and it's flood considerations. There is no need for visitors to enter these tenancies from the rear unless they are reliant on wheelchairs.
Environmental impacts such as sustainable design, overshadowing, wind and reflectivity	Solar amenity and protection from wind tunnelling in the central courtyard is not demonstrated. The proportions of the central courtyard could benefit from being increased to	The central laneway provides access to natural daylight and is an important circulation element in the development. It's an expansive element through all levels of the development and provides adequate spatial amenity to support its purpose beyond mere circulation. Noting that it can provide an area for congregation and community events.

	ensure quality and use of this space.	
The achievement of the principles of ecologically sustainable development	The panel acknowledges the sustainability targets set for the project of 5.5 star NABERS energy and 2 star water rating and encourages further development of strong ESD principles for the project.	Noted
Pedestrian, cycle, vehicular, and service access, circulation and requirements	Pedestrian circulation is too complicated especially considering accessibility requirements. Some of the accessible amenities can be approached only through public domain, which is not acceptable.	The landscape plans proposed replacement or addition of street tress improving the biophilic design response to the streetscape
Impact on, and any proposed improvements to, the public domain	See street frontage and street frontage height	Noted.
Key issues, further comments and recommendations	The Local Green Grid diagram in the design report does not indicate the green strip, and the trees along the street frontage, however the existing green set back is more substantial than most of the highlighted green areas.	The landscape plans proposed replacement or addition of street tress improving the biophilic design response to the streetscape.
	Keeping a 3 metre wide green set-back is recommended, in line with the previous design excellence panel's opinion.	There is no identified Development Standard dictating a 3m wide green set back
	The over 500 car parking spaces would cause big pressure one the single lane roundabout which would be congested in peak hours due to short queuing distances in the underground car park.	Refer to the traffic engineer's response.
	In general the site is overdeveloped, internal arrangement, fire egress strategy and circulation is over complicated and not efficient. Open corridors are not weather protected, creating stormwater management and maintenance issues. Considering the special shape of the site the FSR increase and the height increase are not supported.	Each of the concerns raised by the design panel and Council RFI have been addressed and supported now and throughout the design process prior to the DA submission. The site is large and it's long – open connections throughout the site are provided to assist with breaking down the massing and enabling clear circulation. The design proposal is better for being open air rather than enclosing the entire site. There are weather protected walkways and stormwater management is addressed in the civil engineering report

This response has been prepared by Two Form Architects, as the Project Architects. Nominated Architect is Kristina Mitkovski, NSW registered Architect (no. 7998).