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Sent: Tuesday, 6 April 2021 4:46 PM
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Cc: Liam Frayne <LFrayne@georgesriver.nsw.gov.au>; Tanya Zabarar <TZabarar@georgesriver.nsw.gov.au>; Elina Braunstein <embraunstein@gmu.com.au>; GMU Finance <finance@gmu.com.au>
Subject: GMU review comments for 742-746 Forest Rd and 21 Prospect Rd (DA 2021/0016)

Hi Liam, Catherine,

GMU has reviewed the received DA documentations for 762-764 Forest Rd and 21 Prospect Rd (DA 2021/0016). We have also conducted a site visit and reviewed the current planning controls applied to the site and its immediate area to understand the existing and desired future character of the area. The proposal seeks approval for a 3-storey seniors hostel development in an "L" shape wrapping around the retained heritage listed "Collaroy House" (No. 764 Forest Rd). Based on the review, we consider that the current proposal presents an excessive bulk and scale that does not provide a sympathetic response to the existing and desired future character of the area. Detailed concerns and issues are discussed below.

Existing context and character

The site visit and desktop research suggest that the area is predominantly characterised by lower scale (1-2st) fine-grain residential development. The current DCP controls envisage max. 2-storey developments within the R2 residential zone with an external wall height of up to 6.8m. Due to the existing geometry of the allotments, the existing developments in the vicinity of the site present a strong staggered building alignment with varied landscaped front setbacks to streets (approx. 3-10m as is measured perpendicular to the street boundary from Nearmap). Vehicle entries to basement parking areas are largely recessed away from the street boundary to mitigate its potential visual impact to the streetscape character.

The Uniting Banks Lodge (residential aged care facility) located along Baumans Rd is larger in its footprint area. It generally presents a 2-storey form plus pitched roof. The angled building alignment with increased front setbacks and landscaped side setbacks (approx. min 3.5m) assist in reducing its perceived bulk and scale whilst providing an improved fit to the context and predominant streetscape character.

Excessive bulk and scale

The proposed development presents a 3-storey continuous wall of development (approx. 39m in facade length) to Prospect Rd and when viewed from Forest Rd, which does not present a harmonious fit to the context and is considered excessive in its current form. The parallel building alignment to street frontages with insufficient setbacks and facade articulation to Prospect Rd (3m to the first 2 floors and 4m to the third level) and side boundaries (min. 1.68m) further exacerbates its perceived bulk and scale and is incompatible with the existing residential streetscape character.

The current DCP provides varied setback controls for different types of residential development within the R2 zone. However, one of the main common objectives for setbacks is to be "compatible with predominant patterns of buildings and gardens that define the existing and desired character of each neighbourhood". A detailed streetscape analysis is recommended to assist in informing an appropriate built form outcome for the subject development.

As shown in the photomontages and elevations, the exhibited continuous built form will result in a development that appears to be more of a medium and higher density development that is inconsistent with the predominant character of the area. We consider that increased setbacks and deeper/wider vertical indentations to building facades should be incorporated to achieve a more "pavilion" style development with increased opportunity for pockets of landscaping to break up the form and its visual bulk. The intention of using additional trees and plants to mitigate the perceived scale is not considered appropriate to address the issue.

The proposal claims that the third level is specially designed in a mansard style roof form as an attic space to mitigate the visual appearance. However, the continuous roof form with inadequate articulation, setbacks and variations make it appear to be a normal habitable floor level, contributing to the excessive form. We consider that a considerable reduction in its footprint area is required to create an appropriate roof profile that will moderate the proposed form, i.e., increased setbacks, breakups in the roof form etc.

The proposal intends to facilitate the proposed new development through removing the existing large canopy trees located at the south-eastern corner of the site (No. 762 Forest Rd). We are concerned that it might alter the existing landscape character of the site, especially when viewed from Forshaw Ave and when approaching from Forest Rd.

It is noted that the featured jerkinhead roof of the heritage house is partially visible from Prospect Rd. Subject to further heritage advice, we consider that it would be good to maintain the existing view link to the heritage house from Prospect Rd. This could be potentially achieved through built form design with different treatments to the internal layout plan and architectural design.

Insufficient floor-to-floor heights

The height plane and section diagrams suggest that the majority of the building sits under the 8m (SEPP) and 9m (LEP) height controls. However, we noted that this is achieved through lowered floor-to-floor/floor-to-ceiling heights (i.e., 2.9m for ground to Level 2). There are no RL's indicated for the topmost floor on the plans. As is measured from the drawings, it appears that the floor to ceiling height of the top level is only at 2.4m which is not acceptable. Further clarification is required.

The reduced floor-to-floor height will compromise the internal residential amenity. Increased floor-to-floor/floor-to-ceiling heights are required to provide improved opportunity for daylight access and natural ventilation and a sense of spacial for small rooms. We understand that the proposed bulk and scale would be further exacerbated if appropriate floor-to-floor/floor-to-ceiling heights were employed.

Landscaping

The current DCP requires a min 2m landscaped area alongside boundaries to reduce the visual impact of buildings. Underground parking areas are to be concentrated under building footprints to maximise deep soil landscaping. In DCP Section 4, one of the common performance criteria for setbacks and building separation is to "create deep soil areas that are sufficient to conserve existing trees or to accommodate intensive new landscaping".

However, the architectural and landscape plans suggest that the proposal only provides min 1.68m to the eastern boundary and 3m to the south. The proposed setback zones will be predominantly occupied by egress path/decomposed granite maintenance path with limited opportunity for deep soil planting to screen off the overbearing bulk and scale whilst mitigating associated amenity impacts on neighbouring properties.

Amenity impact

- The proposed built form with reduced side setbacks creates an increased sense of enclosure and visual impact to the adjacent residential developments. The 3-storey fire egress should be incorporated within the main building design.
- It is noted that the retained heritage house is not integrated into the main development. There is a narrow gap (approx. 0.4-1m) between the new building and the retained heritage component. We consider it would be good if an increased separation distance to be provided for landscaping. This will provide an improved visual relief for the neighbouring developments.
- The proposed breezeway with selected aluminium framed doors and windows facing the adjacent residential development may create overlooking and visual privacy issues.
- The proposed vehicle entry gate with a width of 6.58m and height of up to 5.4m closer to the street boundary is seen as a non-contributory element to the existing residential streetscape character.
- The open garbage collection area should be enclosed and incorporated into the main building design as it will impact on the neighbour's residential amenity i.e., odorous and noise issues etc.
- The blank wall side facades should be treated with high quality materials and architectural design to create visual interest when viewed from the surrounding areas.
- The accessible units with window openings facing the breezeway result in visual privacy issues and should be reconsidered.
- Units 19-20, 44-45 and 68-69 with terraces facing directly to the eastern boundary will create overlooking and visual privacy issues.

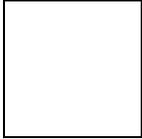
Additional information required

- The SEE report claims that given the site constraints, a 3-storey development is required to achieve the allowable FSR of 1:1 under the SEPP Seniors. However, there is no GFA calculation diagram provided for assessment. Further clarification and details are required.
- The proposed RL levels are required on all the elevation and section drawings.
- Further shadow impact analysis is required (i.e., sun-eye diagram or elevational study) to demonstrate the actual impact on the neighbouring developments.
- Further arborist's advice is required to determine if the removal of the proposed trees are considered appropriate and acceptable

Kind Regards

Liz Zhang

Associate Urban Designer



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