



REF: add.info.2604-268.keira.st.&.23.kenny.st.wollongong(2)

20th March 2020

General Manager
Wollongong City Council
Locked Bag 8821
WOLLONGONG DC NSW 2500
ATTENTION: ANNE STARR

Dear Anne,

**RE: DEVELOPMENT APPLICATION NO. DA-2019/748
PROPOSED DEMOLITION OF EXISTING STRUCTURES & CONSTRUCTION OF A
MIXED-USE (SHOP-TOP HOUSING) DEVELOPMENT
264 & 268 KEIRA ST & 23 KENNY ST, WOLLONGONG**

I refer the Wollongong design review panel (DRP) meeting minutes and recommendations provided in relation to the meeting of 20th January 2020, requesting additional information and/or design changes to be provided in relation to the proposed demolition of existing structures and construction of a mixed-use (shop-top housing) development at the above-mentioned address. We have reviewed the matters in question in conjunction with the project architects Brewster Murray and, where appropriate, conceptual massing, layout and built form of the proposed development has been revised to consider those matters raised by the DRP.

In this regard, it must be recognised that the Project Team collectively have been committed to open consultation and feedback from both the DRP and Council to date, with numerous iterations undertaken and supplementary design responses provided in order to address the advice received throughout the assessment process. To this end, we firmly believe this latest response and revised suite of plan amendments made clearly address the various design matters for consideration, and resolve a strong design intent relation to context, character,



built form and scale, amenity and aesthetics. We consider the design intent to be sound and responsive to the key design controls/standards relevant.

Of particular importance is the site's prominent location in the context of McCabe Park and how this development will positively contribute to its immediate environment, streetscape, surrounding built form and neighbourhood character, through the provision and activation of a dedicated pedestrian linkage from Kenny Street through the land to this public open space. There is a pedestrian scale that is being created by the provision of this new pedestrian link through the site, as well as ground-level activation provided at both the Keira Street and Kenny Street frontages. The development proposes active use of these frontages, and as a result, the proposed development will directly engage with the street level and be designed to be visually interesting and safe.

The contextual response will respond to the current scale of this southern City Centre area, and the corresponding variance in height and type of buildings developing in the immediate vicinity. The height of the proposed development will not be inconsistent with the surrounding built forms evident in the buildings and developments under construction to the south and the west of the site.

Building depth and floor plate layouts contribute to sustainable design performance and internal amenity for future occupants. The proposed building separation between neighbouring buildings is important for occupant amenity, both visual/acoustic privacy and infiltration of daylight to interior and balcony spaces, of which is implemented and appropriate for the proposed development. A variation of residential tower typologies has been considered as requested (rectilinear versus skewed), with the skewed tower providing far better visual interest and identification of the property and, thus being the preferred option. In addition to this, far more detailed contextual analysis has been provided by Brewster Murray in relation to surrounding buildings and site constraints, so as to inform the DRP and Council as to how building form and resolutions have come to be.

Overall, the introduction of ground level commercial and high density housing in close proximity to the McCabe Park public recreation amenities, and the Wollongong City Centre transport connections (bus and rail), amongst other commercial activities and service availabilities, is intended to provide increased opportunities for - housing density and



diversity; improved streetscape interfaces; and enhanced connectivity. In our professional opinion, the urban design response is well resolved, and demonstrates a considered response to built form, context, character and public streets.

In light of this, the following comments are provided in relation to those particular matters raised in the DRP meeting minutes and recommendations provided in relation to the meeting of 20th January 2020:-

ITEM	DRP COMMENTS	ACTION TAKEN
Design quality principals SEPP 65		
Context and Neighbourhood Character	<p><i>A detailed site analysis meeting APG Appendix 1 guidelines (as previously recommended) is essential in a project of this scale and complexity. It would include a "Plan that synthesises and interprets the context, streetscape and site documentation into opportunities and constraints that generate design parameters"</i></p> <p>In response to the Panels previous comments a more detail analysis of the site, its context and potential future context has been provided. The panel is concerned this documentation pre-empted the design proposed not the existing site and context constraints and opportunities giving rise to design options and decisions. The sparsity of detailed information on site and its physical and title encumbrances is noted (e.g Dwg A007/H) In response to this information the Panel provides the following comments:</p> <p><u>Future built forms on neighbouring sites</u> The proposal will establish a building form to which neighbouring sites must respond, ultimately creating a pattern of development for the city block. Drawings A012/B, A013/B, A015/B, A016/B, A018/B, A019/B and A017B. Provides a built form study of the potential future context on adjoining sites.</p> <p>- The adjoining site to the north should be set back from its southern boundary to address the laneway proposed on the subject site.</p> <p>- Solar access to the building forms proposed on neighbouring sites should be quantified to demonstrate the potential to comply with the minimum requirements of the ADG.</p>	<p>1. Additional comments on site constraints have been added to legend on Sheet A007 explaining the limitations that the varying land title restrictions/encumbrances impose on the design of the lane (e.g. easement for parking = land to be maintained for parking, etc.)</p> <p><u>Future built forms on neighbouring sites</u></p> <p>2. Building(s) to the north have been set back from their respective southern boundary to better respond to proposed laneway interface and contextual analysis.</p> <p>3. Solar access to neighbouring sites has been quantified with the assumption that only the towers are to be residential (as a result of the built-to -boundary City Centre requirements of up to street frontage height/podium level):-</p> <p>a. Due to sun plane access and height limitations and floor space allowed, it is assumed that the buildings on Keira Street are office towers, meaning</p>



	<p>that there will be no overshadowing compliance required.</p> <p>b. Also for the purpose of this study, the neighbouring buildings on Kenny Street have a commercial podium and residential tower.</p> <p>4. Solar eye diagrams drawn to demonstrate effect of future overshadowing are provided on sheet Architectural Plans A406 and A407.</p> <p>5. FSR for proposed built forms on neighbouring sites have now been quantified in consideration of closely complying with LEP development standards.</p> <p>6. Solar access available to the proposed site and to the proposed residential components of neighbouring buildings are now quantified. The outcomes show that 80% of units on the proposed site receive 2hrs direct sunlight between 9am and 3pm mid winter to living rooms and balconies, and only 14% receive no direct sunlight at all. This outcome surpasses the requirements of the ADG.</p> <p>Further to this, solar access achieved for the residential apartments in comparison to a future context is also demonstrated. Even those though the ADG doesn't consider presumptuous future built form impacts for infill development site such as this, the proposed future built form to the north has been modelled in, and the proposal is still able to achieve solar access to some 60% of proposed units. The design maximises north aspect and the number of single aspect south facing apartments are minimised, consistent with the ADG.</p> <p>7. Ground floor movements has been modified to allow easier pedestrian flow (refer Laneway Diagrams 1 Plan for further details):</p> <p>a. Fence between parking easement and lane now replaced with bollards, allowing pedestrian through-link without the need to get onto the raised ground level.</p> <p>b. Ramp revised to allow easier access off of Keira Street into the site.</p> <p>c. Additional stairs added to the retail off the laneway so as to reduce conflict between residents and retail</p>
<p>- Potential building forms studies on neighbouring sites should be expanded to demonstrate potential FSR compliant (or close to compliance) with council controls.</p> <p>- Solar studies (A018/B and A019/B) appear to be demonstrating that the majority north facing units (up to level 5, of the current proposal) will receive little to no solar access once the neighbouring property to the north is developed, this is not acceptable.</p> <p>Future built form studies should aim to demonstrate equitable and cohesive development can be achieved. All buildings should aim to demonstrate compliance with ADG solar access requirements whilst maximizing the potential FSR on each site. No site should be unduly burdened by the pattern of development created by this proposal.</p> <p><u>Title encumbrances and physical constraints</u></p> <p>The panel supports the use of the drainage reserve as a quality public space and link between Kenny Street and McCabe Reserve; but remain concerned that the detail treatment of the open space to the north of the building does not yet successfully address the physical constraints of the site to create a successful lane. Design emphasis should prioritise the quality of the public domain experience and aesthetics over engineered solutions.</p> <p>The proposed pedestrian entries and movement systems at the ground and elevated ground levels are unnecessarily complex, particularly as main entrances are remote from both streets. Detailed consideration of pedestrian volumes, desire lines, most convenient access paths and conflicts for occupants, visitors, public through traffic including for prams and wheelchairs would lead to a more legible, simpler and convenient solution.</p>	<p><u>Title Encumbrances and Physical Constraints</u></p>



		visitors.
Built Form and Scale	<p><u>Sub-Ground works</u> Two basement car parks extend under the drainage reserve and into parking and access easements. Trunk sewers are required to be diverted. The construction and legal feasibility of these works needs to be verified.</p> <p><u>Ground and Street Level</u> In addition to its function as a through-site link, the drainage reserve functions as the main entry/s and shop-front exposure of the development. In response to the Panel's previous comments further detailed studies and design development has been under taken, however the Panel remain concerned that the proposal appears simply hydraulic-engineering driven solution that lacks the necessary comprehensive, coordinated design approach to achieve a high quality, high amenity, functional, safe place to be in, pass through and overlook.</p> <p>Comments on the plans presented included:</p> <ul style="list-style-type: none"> - Steps have now been aligned with residential entry lobbies, providing an improved connection with the proposed future laneway / cross site link. It is recommended that the extent to which these steps extend into the cross-site link is reduced. This could be achieved by partially recessing the steps into the raised walkway and refining the detail treatment at the base of the building. For example, when considering the steps servicing lobby 2. The egress door in the north west corner of the café could be pull back in line with the lobby 2, this space could then be dedicated to the café allowing the northern wall of the café to be relocated further south to increase the width of the walkway without decreasing the size of the café. The steps could then be recessed into the walkway helping to define the café seating area on the northern face of the walkway, without creating a tight pinch point between the café and the steps. - Consider treatment to existing adjacent walls to north or new 'green wall' on boundary as a temporary measure that remain in place until the neighbouring site to the north is developed. - Extend proposed design treatment to kerbs in Kenny and Keira Streets - Developments to the north eastern corner of the walkway have created improved potential for café seating. However, the ramp in the north eastern corner creates an overly long access path. Further development should seek to provide an accessible point of access closer to Keira Street. - The parking easement is now more clearly defined in the documents provided. However, it 	<p><u>Sub-ground works:</u></p> <p>8. Noted in previous panel</p> <p><u>Ground and Street Level</u></p> <p>9. Subject stairs have been partially recessed into walkway as requested. No further changes deemed warranted.</p> <p>10. The egress door to Lobby 2 is now aligned with Lobby 2 and associated café space has been modified in light of suggestions.</p> <p>11. Green wall/vertical gardens in part have been documented along the northern boundary as a temporary measure until such time the northern sites are developed.</p> <p>12. Flooring treatment is continued to Kenny and Keira Streets as shown on sheet A119 – Laneway Street Work. This plan has been updated in light of changes.</p> <p>13. The corresponding ramp has been redesigned to allow more convenient access off of Keira Street, without compromising colonnade seating area or Keira Street frontage through rip-rap ramping.</p>



	<p>should be better integrated with the proposed cross site link. Surface materials should provide some visual continuity with the rest of the cross-site link and the proposed fence defining this space should be replace with bollards to allow some shared pedestrian movement, but restrict vehicular access.</p> <ul style="list-style-type: none"> - The planter boxes proposed to the edge of the walkway are a positive development that will assist in concealing the undercroft created for the drainage overflow. However, further development is recommended to integrate the planters with the structure of the building (as opposed to hanging lightweight planters to the edge) and further reduce sight lines to the drainage undercroft. The proposed bench seats along the base of the walkway are considered to be less successful. - The incorporation / concealment of the undercroft created for the drainage overflow is essential if a successful cross-site link / laneway is to be created. Drawings A302/1, A303/C, A304/C and A305/B document the detail treatment of this area. These documents should be expanded to show a large-scale detailed elevation that provides critical dimensions of maximum openings along the entire length of the walkway. Detail treatment of the edge of the walk should be further refined to minimise the visual impact of the undercroft when walking through the cross-site link. <p><u>Low Rise Apartments / base</u></p> <p>The building form has been expressed as a tower that sits upon a defined podium base. This is considered a reasonable / appropriate built from strategy (pending further contextual detail analysis / refinement).</p> <p><u>Tower</u></p> <p>The Kenny Street tower form is clearly driven by LEP heights and ADG building separation standards. In response to the Panels previous comments, an analysis (A016/B, A017/B, A018/B and A019/B) comparing a rectilinear tower and a splayed tower has been provided. The study concludes that the splayed form is preferable. The panel recommends that the contextual studies provided are expanded</p>	<p>14. Driveway paver flooring treatment is continued across the parking easement, and the fence has been replaced with bollards as per recommendations.</p> <p>15. Planters along the edge of the walkway have been integrated with floating seats to provide a 'place pause' along the lane, and detailed as permanent structures (refer to Plan A306 for greater detail).</p> <p>16. Various plans, elevations and sections have been provided clearly detailing the treatment of the undercroft area against the lane interface. Refer to Drainage Easement Plans</p> <p><u>Low Rise Apartments / base</u></p> <p>17. The contextual study demonstrates that the proposed form works successfully in a future context and does not cause any undue burden to neighbouring developments for future development. The contextual response will respond to the current scale of this southern City Centre area, and the corresponding variance in height and type of buildings developing in the immediate vicinity. The height of the proposed development will not be inconsistent with the surrounding built forms evident in the buildings and developments under construction to the south and the west of the site. As such the form is appropriate in its context.</p> <p><u>Tower</u></p> <p>18. A variation of residential tower typologies has been considered as requested (rectilinear versus</p>
--	---	---



	<p>and further analyzed, as outlined above (Context and neighbourhood Character). The form of the proposed building must facilitate equitable and cohesive development on neighbouring sites, creating an appropriate pattern of development for the remainder of the city block.</p>	<p>skewed). It is evident acoustic privacy and infiltration of daylight to interior and balcony spaces of the proposed development show little difference between typologies. What is evident however is that the skewed tower provides far better visual interest and identification of the property within the local setting and, thus being the preferred superior built form option.</p>
Density	<p><i>The proposal appears to comply with the WLEP FSR standards. However, external finessing initiatives should be explored to visually manage the apparent mass and bulk of the tower. See: Aesthetics</i></p>	<p>19. The aesthetic commentary is noted and varying treatments to the Elevations have been adjusted as a result. Refer to Aesthetics section for more details.</p>
Sustainability Cross ventilation	<p><u>Cross ventilation</u></p> <p>Unit 103, 203, 303, 403, 503, 704, 804, 904, 1004, 1104, 1204 and 1304. Are indicated as cross ventilated in drawing A502/H, but fail to meet ADG criteria for cross ventilation. 50% (54 of 107 units) of units are cross ventilated. The proposal does not currently meet the minimum ADG requirement of 60%.</p> <p><u>Solar access</u></p> <p>The proposal is orientated to provide good solar access to the majority of units, when the proposal is considered in its current context. However, when the adjoining site to the north is developed there will inevitable be an impact upon solar access to the subject site. This issue must be examined in greater detail. The contextual study of future built form on the adjoining site to the north must be further developed as outlined above (Context and neighbourhood Character). Once a clear understanding of this context is understood further refinements may be necessary to maximise solar access.</p> <p>Consideration should be given to controlled solar access to the large areas of glazing proposed. Facades should be developed in detail and tested to ensure that each façade responds appropriately to its orientation.</p> <p><u>Water Reuse</u></p>	<p><u>Cross Ventilation</u></p> <p>20. for various apartments, high-level windows have been have been replaced with normal sized windows to allow for better flow of air (without alleviating privacy/overlooking concerns). As demonstrated on the Natural Ventilation plan A502, 62% of all units are now cross ventilated (exceeding minimum ADG expectations).</p> <p><u>Solar Access</u></p> <p>21. Solar access available to the proposed site and to the proposed residential components of neighbouring buildings are now quantified. The outcomes show that 80% of units on the proposed site receive 2hrs direct sunlight between 9am and 3pm mid winter to living rooms and balconies, and only 14% receive no direct sunlight at all. This outcome surpasses the requirements of the ADG. Further to this, solar access achieved for the residential apartments in comparison to a future context is also demonstrated. Even those though the ADG doesn't consider presumptuous future built form impacts for infill development site such as this, the proposed future built form to the north has been modelled in, and the proposal is still able to achieve solar access to some 60% of proposed units. The design maximises north aspect and the number of single aspect south facing apartments are minimised, consistent with the ADG.</p> <p>22. Large spans of glazing have been detailed and provided along the façades, which have been broken up by solid walls and shading devices to better respond to orientation, particularly in the tower.</p> <p><u>Water Reuse</u></p>



	<p>Opportunities to harvest rainwater for use in maintaining any plantings established on the building or the site should be accommodated. Other water minimization measures should be considered. The reuse of rainwater for toilet flushing and washing machines should also be considered.</p> <p>Photovoltaic panels have been provided on the roof as suggested by the Panel. The function of these panels should be clarified. Is the power generated for use in common areas or individual units?</p>	<p>23. A rainwater tank provision has been provided for adjacent to the pump room on the ground level. Specifications as to the use of rainwater are to be covered in any future building management plan, which can be detailed as part of any condition of consent forthcoming.</p> <p>24. Similar to water reuse, specifications as to the future use of PV panels are to be covered in any future building management plan, which also can be addressed via conditions of any forthcoming consent.</p>
Landscape	<p><u>Public Domain</u></p> <p>The panel acknowledges the design is starting to show evidence of the importance of the through site link as a valuable public space for the city, but is driven not by its importance in this role, but rather by the satisfactory engineered amelioration of the 1:100year flood. Breaking up the link into several zones, these aligning with the residential lobbies and commercial/retail spaces, is attempting to link the use of built form and landscape. While a space this size needs more than one use, and therefore the breaking up of space is supported, the current resolution appears to have created a large amount of repetition that caters for little else but seating. There is a vast oversupply of seating in various forms – other program and uses must be considered and included.</p> <p>Further analysis of the surrounding area, including potential connections and destinations this link services should be demonstrated. This will help provide guidance as to other potential uses for the link / spaces.</p> <p>The panel still feel that the inclusion of trees is important for this space to succeed and, while it has been explained that trees are not possible to be placed within this zone, evidence should be provided that no alterations to the current engineering are possible to allow this to change. Adding trees to integrated planters along the raised edge could also be explored if not possible at grade.</p> <p>The structures (seats, planters and shade covers) have been designed to accommodate the flooding issue with thin posts attaching to</p>	<p>25. The future pedestrian link/laneway has been amended to allow more grassed areas for miscellaneous activities. Seating areas have been refined as requested. In this regard, it is important to acknowledge that the primary design consideration as dictated by Council must be relative to flood controls and measures first and foremost. The proposed outcome is a balanced response between optimal urban design/activation considerations and this engineering constraint.</p> <p>26. A potential user study has been added to Plan A120. This clearly identifies pedestrian routes through the subject site in the context of the broader pedestrian network focus points.</p> <p>27. Some trees have been added to the northern boundary, whilst the temporary green wall will live in the blank façades at this interface and provide an extension of the grassed areas within the lane.</p>



	<p>the ground. These structures 'float' over the required clear volume for flooding, but the aesthetic does not appear to have been fully resolved – what happens to the surface under (given some is turf-paving). Is lightweight appropriate for a heavily trafficked public space?</p> <p>No consideration seems to have been given to how the neighbours to the north address this space in the future. Grass-paved pavement seems an inappropriate material for an important space such as this.</p> <p>The fence between the spaces and the parking area should be reconsidered – this detail, especially between the vertical palisades of the fence, and the horizontal seating will produce a poor aesthetic.</p> <p>Could level change be used in the through site link without negatively impacting the flood capacity of the space? This would be worth exploring as it has the potential to lift the quality of the space.</p> <p><u>Level 01</u></p> <p>The resolution of these spaces is more appropriate now. Trees are proposed which is a positive, but the volume provide them by the small planters is inadequate – these should be increased in size to ensure viability and healthy growth is possible. For the POS the trees could be moved to the corners and the planters enlarged in these locations.</p> <p><u>Level 03 / 05 (all levels)</u></p> <p>Specifically, the choice of species along the east-facing balconies seems inappropriate given the exposed conditions there. All species should be chosen (on all levels including ground) to suits their growing conditions, be low water using (and/or irrigated) and match council's preferred species.</p> <p><u>Level 06</u></p> <p>The variety of spaces on level 6 is limited with only dining spaces indicated – however only 1 BBQ facilitating 5 spaces is shown. More thought needs to be given to the types of users this development will have, and their needs. It should be ensuring that the seating is BCA compliant and that balustrades are not climbable due to the seating around the edge.</p>	<p>28. Seating along the laneway has been modified to show a more solid base structure.</p> <p>29. The permeable pavers have been changed to grass. The furniture rests within the grassed areas. Arrangement of seating structures and boundary details have been amended to allow future developments to the North, to respond to and build onto the laneway interface.</p> <p>30. Seating along the laneway (in the area of the parking easement) has been modified to reduce the conflict between the fencing elements and seating beyond.</p> <p>31. Although changing the levels could creating some benefits to the laneway, it would create a greater disturbance to the flood reserve as changes in level will impede stormwater/floodwater flow. Again, the strict application of Council's flood controls dictate level change is not suitable in this instance.</p> <p><u>Level 01</u></p> <p>32. Refer to landscape plans for details regarding planting species at this level. Notwithstanding, through variations to the apartment layouts above, less structure is now proposed over the eastern COS to improve plant growth opportunities.</p> <p><u>Level 03 / 05 (all levels)</u></p> <p>33. Again, refer to the landscape plans for details regarding planting species a corresponding levels.</p> <p><u>Level 06</u></p> <p>34. Greater variety of spaces has been now been provided , inclusive of – a sand pit area for children, covered and uncovered seating, lounge area, outdoor cinema, and BBQ area</p>
Amenity	<p>The plans should include bedroom (ex wardrobes) and living area dimensions to</p>	<p>35. Dimensioned plans have been added demonstrating compliance with ADG</p>



	<p>verify that ADG guidelines are met.</p> <p>ADG guideline for Kitchen depth from windows appears exceeded in most instances, dimensions should be provided to demonstrate ADG compliance.</p> <p>There are a number of issues relating to the interface between windows and balconies in the south eastern portion of the building:</p> <ul style="list-style-type: none"> - Bedrooms to units 208, 308, 408 and 508 are serviced by high level windows, contrary to the requirements of ADG, Objective 4A-2. Note if the sills on these windows were to be lowered, they would be non-compliant with ADG setback requirements. - The balconies to units 313 and 514 are approximately 3m from the bedroom windows of units 508, 408 and 308. This is likely to create potential for acoustic and visual privacy issues between units. - The main balcony to unit 514 is oriented towards a blank wall. <p>Further development is required to eliminate potential privacy issues and improve amenity. This is likely to require a reduction in the number of windows and balconies orientated into this space.</p> <p>Convenient GF lobby to stair access needs to be provided (power outage/lift maintenance)</p> <p>The extensive indicated basement storage over car spaces is impractical and non-compliant with the ADG.</p>	<p>requirements (refer to plans Apartment Design Guide – Unit Layouts 1 to 4)</p> <p>36. As demonstrated in the above plans, no units exceed the ADG guideline for kitchen depth windows.</p> <p>37. Windows to bedrooms in 208, 308, etc. have been changed to allow for full-size windows and appropriate privacy louvres screening. The positioning of these bedrooms are well set back into the southern elevation at protected by building articulation and façade extrusions from other parts of the building against that of the neighbouring boundary. The distance attenuation provided is considered appropriate based on the design and the privacy measures taken, and will not conflict with this ADG objective.</p> <p>38. The floor plans have been modified to completely remove balconies at this location and the associated suggested privacy issues</p> <p>39. Unit 514 has been modified to alleviate potential privacy issues.</p> <p>40. The project BCA consultant is to confirm that the current stair access is acceptable.</p> <p>41. Over-bonnet car storage cages have been maintained for many units, as they do not impede on the height clearances of car spaces. The storage is still easily accessible and conveniently located (without impeding car spaces), and therefore compliance with ADG requirements.</p>
Safety	<p><i>In its role as a public through site link and providing entry to a significant number of apartments the design of the drainage reserve (cross-site link / laneway) must include considered attention to safety aspects including lighting, passive and active surveillance.</i></p> <p><i>The size and complexity of the development, the remoteness of the entries warrant a detailed management plan to be included in any application for consent. This would include proposals and commitments relating to all security and safety issues.</i></p>	<p>42. The Laneway Concept Plan holistically considers the safety aspects this area will need, and provides further attention to detail around protection measures such as lighting, access, pedestrian/vehicle conflict, sightlines, and permeability. This plan clearly delineates the design intent this space and building interface, and how security and safety measures have been implemented. Notwithstanding, it may be reasonable to incorporate a commitment to</p>



	<p><i>Potential conflicts between the parking easement and pedestrian cross site link must be addressed.</i> But this must not detract from the open space's role as a cross site link. Refer to comments above (Built form and scale).</p>	<p>security and safety within any future building management plan to be prepared, which can be appropriately conditioned in any forthcoming consent</p> <p>43. Potential conflicts between the parking easement and the cross-site link have been eliminated/mediated through the use of bollards. Additionally, an alternative raised route through the site (colonnade) is still available for pedestrians also.</p>
Housing Diversity and Social Interaction	<p><i>A wide mix of apartment sizes is proposed. This will potentially provide an appropriate contribution to this precinct. It is noted that no 'affordable' or social housing is included.</i></p>	<p>Noted.</p>
Aesthetics	<p>The building base has been articulated to mediate its broad northern elevation, creating a rhythm that flows through to both street elevations. However, materials still appear consist predominantly of painted finishes. The introduction of a good quality brick into the base of the building should be considered.</p> <p>The composition of the tower is less successful, particularly its broad northern façade, which appears to be expressed with a series of rectangular frames imposed on the façade with no clear purpose. Consideration could be given to a more vertical expression for the tower. The blank, limited fenestration, sunless, south presentation of the tower warrants further careful design consideration beyond patterns of paint colour.</p> <p>The abrupt termination of the tower (a previous panel comment) has been addressed, but not from the south view. The applicant is encouraged to develop this idea further. By developing the building base to be more clearly expressed as two separate elements that allow the tower to extend down to the ground level.</p> <p>The lightweight nature and design detail of the structures located in the through site link, feel inappropriate for a public space such as this. How will they stand up to the rigours of being in public use throughout the day? They must be capable of withstanding daily use and not be susceptible to potential vandalism.</p>	<p>44. The tower is to be articulated with applied finishes that bring rhythm and scale to the building. The suggested introduction of a brick look to the base is considered reasonable where appropriate, however, the design of this building is aimed at a more transition rhythm quality and offers more recessive architecture rather than such a dominant statement like brickwork will bring.</p> <p>45. Façade articulation has been modified in response to orientation and vertical expression, reducing the appearance of those suggested "blank" facades. It is considered that the tower now achieves a more elegant and proportion and form as a result.</p> <p>46. Southern façade treatment amended to express the verticality of the tower and its relationship with the podium. The use of façade fenestrations and varying colour treatment has been deliberately selected to successfully achieve this.</p> <p>47. Structures within the through-site link have been adjusted to be less light-weight in appearance, and more consistent with what may be found in public places such as this.</p>
Design Excellence WLEP2009		
Whether a high standard of	<p><i>The Design Excellence standards of WLEP 2009 are applicable to this site.</i></p>	



architectural design, materials and detailing appropriate to the building type and location will be achieved	<p><i>The standard is considered achievable, with further development.</i></p> <p>The proposal needs to demonstrate that the significant constraints to developing this site have been fully identified, assessed and solutions are practically, legally co-ordinated and workable to meet this standard.</p>	<p>48. The land title constraints imposed on the site have clearly been identified and defined within the site's Constraints and Definitions Plan A007. In addition, flood constraints measures have also been provided through the provision of the appropriate engineering advice. The resulting laneway design complements and coordinates a resolved and suitable design solution in consideration of these constraints, as is detailed in the extensive design analysis documentation provided by Brewster Murray. Good design responds and contributes to its context, and it is considered that the level of Architectural standard achieved within the proposed development design is high.</p>
Whether the form and external appearance of the proposed development will improve the quality and amenity of the public domain,	<p><i>Further work needs to be evidenced in the analysis and synthesis of the complex contextual, engineering, title and physical opportunities and constraints of this site. Design objectives and priorities need to be clarified and the alternative options considered for resolving conflicts addressed.</i></p> <p><i>e.g the 'public domain' quality and function of the through-site link is still considered unsatisfactorily compromised by the single flood management option considered.</i></p>	<p>49. There is a pedestrian scale that is being created by the provision of this new pedestrian link through the site, as well as ground-level activation provided at both the Keira Street and Kenny Street frontages. The development proposes active use of these frontages, and as a result, the proposed development will directly engage with the street level and be designed to be visually interesting and safe. All this has still been achieved even with restrictive flood engineering controls which are required to be adhered to first and foremost in accordance with Council's practices.</p>
Whether the proposed Development detrimentally impacts on view corridors,	NA	-
Whether the proposed Development detrimentally overshadows an area shown distinctively coloured and numbered on the Sun Plane Protection Map,	<i>Compliance is claimed but needs to be verified.</i>	<p>50. The extent of overshadowing the development proposes onto McCabe Park has been demonstrated, and will not conflict with Sun plane access controls as required.</p>
How the development addresses the following:	-	-
the suitability of the land for development,	<i>Yes, subject to satisfactory resolution of constraints.</i>	Noted.
existing and proposed uses and use mix	<p>Commercial space proposed is limited in area and to the ground floor. Whilst a greater proportion of commercial/retail would normally be encouraged, the panel believes with its location above street level, design focus should be on providing the highest quality experience by creating a cross site link activated by retail.</p> <p>The wide variety of residential apartment sizes is supported.</p>	<p>51. Again, of particular importance is the site's prominent location in the context of McCabe Park and how this development will positively contribute to its immediate environment, streetscape, surrounding built form and neighbourhood character, through the provision and activation of a dedicated pedestrian linkage from Kenny Street through the land to this public open space. It is considered that much of the design response changes made to this ground floor plane and cross site link to achieve improved experience for pedestrians as intended.</p>



heritage issues and streetscape constraints,	<i>McCabe Park across Keira Street is a Heritage item. See notes re shadows below. Further work is required to address visibility and access of elevated ground level uses to the street level. Refer above.</i>	52. Minimal extent of overshadowing on McCabe Park is caused by the development, which has been appropriately demonstrated in accordance with Sun plane access controls. 53. Access to the elevated ground floor has been revised to provide easier access of off both Kenny and Keira St. Further, the visual impact of the raised floor has been demonstrated and mitigated by the use of planters and seating along the length of the raised edge.
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 on neighbouring sites in terms of separation, setbacks, amenity and urban form,	<i>The tower location apparently complies with WLEP numerical standards, and APG building separation guidelines (boundary setback) Further investigation is required into its relationship with other (proposed) towers on neighbouring sites.</i>	54. The relationship with adjoining future neighbouring sites and possible development forms has been demonstrated by Brewster Murray in the contextual analysis diagrams provided.
bulk, massing and modulation of buildings	Further development of future built form context is required.	55. The future built form study has been revised accordingly
street frontage heights	Appears to address relevant standards.	
environmental impacts such as sustainable design, overshadowing, wind and reflectivity	Further development is required to meet minimum ADG natural cross ventilation objectives. Further analysis of the proposal solar performance within potential future built context is required.	56. Apartments have been amended to suit cross ventilation needs and the solar study within future context has been provided.
the achievement of the principles of ecologically sustainable development	-	-
pedestrian, cycle, vehicular and service access, circulation and requirements	Further development to the cross-site link is required.	57. Access through cross site link has been revised with a clearer design intent and greater variety of spaces provided
impact on, and any proposed improvements to, the public domain	<i>The panel supports the public use of the drainage reserve, but the design process needs to further demonstrate it will be a high quality, high amenity, functional, safe people place to be in, pass through and overlook.</i>	58. The lane allows direct access through the site with considered functional spaces. As aforementioned, an appropriate balance is now provided between engineering requirements, safety, functionality, and pedestrian activation.
Key issues, further Comments & Recommendations	A significant volume of work has been undertaken in response to the panels previous comments. However, the following issues require further development if the design excellence requirements of this site are to be achieved: - Further development and analysis of the future built form context of the site, to demonstrate equitable and cohesive development can be achieved by the subject site and its neighbours. - Detail refinement of the open space to the north to provide a successful cross site link.	59. The contextual study has been extended to demonstrate the equitable opportunities to neighbouring site. 60. Engagement of the through-site link with its northern boundary has been modified to allow future developments to build onto the lane. Additionally as aforementioned, an appropriate balance is now provided between engineering



	<ul style="list-style-type: none">- Further refinement of the building aesthetic.- Further refinement to improve amenity and demonstrate compliance with the minimum requirements of the ADG.	<p>requirements, safety, functionality, and pedestrian activation.</p> <p>61. Materiality, fenestrations and treatment of exterior finishes has been modified to reduce extensive glazing and improve visual aesthetics.</p> <p>62. Adjustments to apartment layouts and dimensioned plans demonstrate ADG compliances.</p>
--	--	---

As shown above, and our professional opinion, the urban design response is well resolved, and demonstrates a considered response to built form, context, character and public streets. We consider the design intent to be sound and responsive to the key design controls/standards identified by the DRP.

We trust this information satisfactorily addresses DRP's advice to date. We look forward to discussing further with both Council in working towards a favourable determination of the subject DA.

Yours faithfully,
MARTIN MORRIS & JONES PTY LTD

LUKE ROLLINSON BUrbRegPlan DipArchTech MPIA
DIRECTOR – TOWN PLANNER