

COUNCIL SUBMISSION on MP10_0037 MOD1 – Modification application for ALLENGROVE CONCEPT PLAN

An amended design for the project containing the number and mix of units and changes to the building envelopes was the subject of consideration by Council's Urban Design Review Panel (UDRP) and a Prelodgement Panel. One purpose of the panels was to provide feedback to the proponents prior to the lodgement of the Section 75W modification application to the Department of Planning and Infrastructure (DoPI) and a subsequent Local Development Application to Council. Council accepts that the Concept Plan has been approved and is seeking to ensure that the development that results from implementation of that approval will be one that optimises amenity for the future residents while protecting as much as possible, the amenity of current residents. Council's submission therefore deals with two major areas of concern, being that:

1. Any modifications approved under a Section 75W application should clearly demonstrate a better design and amenity outcomes for the proposed development and not be simply a tool to increase yield for the site. In this regard, Council is not convinced that the submitted design has achieved this outcome due to the compromises that have to be made to satisfy adopted standards for residential flat buildings. A case in point is the need to introduce lightwells in an attempt to illuminate and /or ventilate some units. The effectiveness of the lightwells has not been demonstrated. Other concerns raised by Council's UDRP similarly appear not to have been satisfactorily resolved. Comments by the UDRP are provided below.
2. Any increase in the number of units on the site should not create additional traffic movement associated with the development site. Council recognises that the proposed increase in unit numbers is a result of a change to the unit mix. However, a consequence of this increase is an increase in car parking spaces and hence an increase in the number of traffic movements for the site. Council's earlier submissions raised particular concern as to the inadequacy of the road network around the site to accommodate additional traffic. All the major intersections nearby have reached capacity and the only access to the development site is via a narrow dead end road with a left-in / left out turning movement to and from a major arterial road close to one of those intersections. A continuation of the argument that the additional traffic is incremental (and by implication, does not make the failing situation any worse) is not satisfactory. Given the proximity to public transport and employment options which underpins the original Concept Plan approval, there is an argument that any increase in unit number should not be accompanied by additional car parking provision.

Additional Unit Numbers.

The additional yield appears to have been achieved largely by introducing a new element to the mix of units being the “1 bed + studio” unit. These are now the predominant single style of unit within the development (32%) and represent one-third of the total mix. This is an issue if these rooms are not designed to be a single bedroom unit with a flexible internal space that can be used for an ancillary purposes (such as a study) and are instead designed and presented as a de facto two bedroom apartment.

Before approving any modification, the Department should be satisfied that the proposed 1 bedroom + study units are genuinely configured for that purpose and are not 2 bedroom apartments in disguise.

A comparison of the unit mix in the Concept Approval indicative floor plans and the proposed modification is detailed in Table 3 below.

Dwelling Type	Concept Approval	Concept Percentage	Proposed	Proposed Percentage
Studio	8	5%	21	12%
One (1) bedroom	49	32%	14	8%
One (1) bedroom + study	-	-	58	32%
Two (2) bedroom	72	47%	39	22%
Two (2) bedroom +	-	-	38	21%

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Extract from Modification Application Report

Proposed Lightwells

The introduction of lightwells to the design of Buildings A, B and C is new. Again before approving any modification, the Department should be satisfied that these work to achieve the designed outcome of providing light and ventilation to units within the development. The practical issues of maintenance need to be considered. For example, will the lightwells collect debris and if so, how will they be cleaned.

The proponents' submission claims that the additional units are provided while still enabling compliance with the objectives of SEPP 65 the objectives and Rules of Thumb of Residential Flat Design Code 2002". However, there is some concern that the amended design is less compliant. Council's Urban Design Review Panel *questions the efficacy of the lightwells for cross-ventilation and views them as unacceptable because of the potential for noise and odours to travel between units. They are up to five times taller than they are wide, and would therefore offer little daylight to adjoining spaces, particularly on the lower levels.* The Panel suggested that if *the lightwells were removed, along with the adjoining internal rooms ...the overall width of the buildings could be reduced to a footprint similar to that of Building D, thereby increasing the width of the external spaces between the buildings.*

With regard to related aspects of the design, the panel made the following comments:

Internal Spaces

The single aspect units in Buildings A, B and C include an internal room facing a lightwell. This room appears to be shown on the plans as a study, but could easily be converted into a bedroom. The amenity of these rooms is unacceptable and they should be removed.

The single aspect units in Buildings E also have internal spaces without direct access to light and air. They should also be deleted.

Bedroom Windows

The bedrooms to the single aspect units in all buildings have a solid external wall and receive light and air solely from the adjoining terrace or balcony. It is recommended that operable windows be provided in the external walls. This will assist natural ventilation. If traffic noise is an issue, the windows can be closed and will then still provide morning sunlight to these bedrooms.

Natural Cross-Ventilation

It is understood that the Applicant's estimate of the total number of cross-ventilated units relies on the inclusion of single aspect apartments which connect to the proposed lightwells. As noted above, the Panel does not accept that the lightwells can be relied upon for natural ventilation. It notes that in the Concept Approval the number of units served by a lift and stair was typically three, two naturally cross-ventilating and one single aspect. In the current proposal each lift and stair generally serves four units, two naturally cross-ventilating and two single aspect. The percentage of units naturally cross-ventilating is therefore expected to be less than the 60% standard in the SEPP 65 Residential Flat Design Code.

Sunshading

Whilst metal screens are provided for sunshading on most elevations where they are required, there are some locations where screens are not shown, but are necessary (the West Elevation facing Lane Cove Road for example). All openings receiving sun west of due north should have screens.

Elevations

It is noted that if windows to the bedrooms in single aspect apartments are provided (refer bedroom windows above) the corresponding elevations will be improved by reducing the perceived mass of the external bedroom walls.

The Panel also notes that the North Elevation facing Epping Road, and to a lesser extent the West Elevation facing Lane Cove Road, are less visually interesting than other elevations within the scheme. It is recommended that the North and West Elevations be enhanced along the lines of the other elevations to provide greater articulation and visual interest and reduce their perceived scale.

The Modification application provides an opportunity to address some other shortcomings with the approved design and should not just be an exercise in increasing the overall yield for the site. Council's UDRP has provided comment on design matters which could enhance the development within the limits imposed by the approved Concept Plan. If the subject Modification does not represent a clear improvement to the existing Concept Plan in all aspects of the design, then it should not be supported by the Department. If it presents an improvement in some aspects of the design, they can be supported without accepting the possibly deleterious effect of increasing the number of units or changing the mix.

Council's URDP considered a version of the modified design for Allengrove in March 2013. The version on the Department's website is dated June 2013. The proponents have subsequently submitted a Local Development Application Council dated July 2013 which has

included a response to the UDRP comments (as Appendix 5). It is not clear if the Department has had the benefit of access to that document but the proponents may include it in any response on these issues. However, to assist the Department's consideration of this Modification application, a full copy of both the Council's Urban Design Panel comments and Appendix 5 are provided with this submission.

Additional car parking

The additional car parking is required to accommodate the additional units and as this creates additional traffic movement for the site. In principle, this is a concern given the existing constrained access for the site. It is noted that the proposed changes to the basement levels of the building seek to achieve other things. The proponents advise that improvements have been made to the basement layout to make it work better, increase storage, provide for on-going waste management and to meet comply with the current Concept Plan approval.

In principle, the concern remains regarding the impact that the traffic generated from this development will have on Allengrove Crescent and surrounding streets and Council will continue to question its merits as a Transit Oriented Development. However, the dilemma remains that the car parking demand that will be generated by this site needs to be accommodated on the site and with as little impact on surrounding residential streets as possible. The final car parking allocation will necessarily be a product of the number of dwelling units that are actually approved under the submitted Modification Application.

Conclusion

The aim of any modified design for the Allengrove site should be to provide better urban design outcomes for both new residents on the site and existing residents who live nearby. Council is not convinced that the submitted design achieves a better design outcome in some crucial areas including access to light and ventilation for some units. It is not convinced that the introduction of the lightwells to some buildings will provide the required level of amenity to those units and in this regard, requests that the Department look very closely at this aspect of the design prior to determining the application.
