



Department of Planning & Infrastructure
GPO Box 39
Sydney NSW 2001

Attn: Mark Schofield

21 October 2013

Re: S75W Application – Allengrove Crescent (MP10_0037)

Dear Mark,

I refer to your correspondence of 9 October 2013 requesting an addendum to our Response to Submissions so as to address the City of Ryde Council's submission to the public exhibition of the abovementioned application.

Attached is an Addendum as requested which responds to each of the issues raised.

I trust that the information provided responds to the issues sufficiently and will enable the assessment and determination of the application.

Should you have any questions or wish to discuss any aspect of the information provided, please do not hesitate to contact me on (02) 9380 9911 or by email at mbaker@sjb.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M. Baker', written over a circular stamp or seal.

Michael Baker
Associate Director

Attachment 1: Addendum to Response to Submissions

Addendum to Response to Submissions

1. City of Ryde Council

| Issue | Response |
|--|---|
| (1) The modification should demonstrate a better design and amenity outcome for the proposed development and not be a tool to increase yield for the site. | <p>The Concept Approval did not grant consent to a fixed number of apartments or car parking spaces. The Concept Approval only granted consent to the use of the site and building envelopes that translate to a particular dwelling yield dependent on the size and mix of dwellings.</p> <p>The proposed modifications seek to make minor amendments to the approved building envelopes of the residential flat buildings, alter the floor layouts of the indicative concept plans to provide a more efficient floor layout. These amendments result in an increase in the number of units and associated car parking over that shown on the indicative floor plans submitted as part of the Concept Application.</p> <p>The floor area now proposed is less than that of the Concept Approval.</p> |
| (2) Council is of the opinion that the design does not satisfy the adopted standards for residential flat buildings | This issue relates to the natural ventilation of apartments which is addressed in the response to Issue 7 and 8(c) below. |
| (3) Other concerns raised by the Council's Urban Design Review Panel appear not to have been satisfactorily resolved. | This is a matter for the assessment of the Development Application, not the modification of the Concept Approval |
| (4) Any increase in the number of units on the site should not create additional traffic movement associated with the development site. | <p>As identified in relation to Issue 1, the Concept Approval did not grant consent to a fixed number of apartments or car parking spaces. The Concept Approval only granted consent to the use of the site and building envelopes that translate to a particular dwelling yield dependent on the size and mix of dwellings.</p> <p>Notwithstanding this, the issue of an increase in traffic and parking has been addressed in the Traffic Impact Assessment submitted with the modification application and was previously addressed as part of the Concept Approval.</p> <p>The Traffic Impact Assessment has concluded that there is adequate capacity in the surrounding road network to cater for the traffic generated by the proposed development.</p> |
| (5) Given the proximity to public transport and employment options, there is an argument that | Part 9.3 – Parking Controls of the Ryde DCP 2010 identifies a minimum of 176 spaces and a |

any increase in unit number should not be accompanied by additional car parking provision.

maximum of 237 spaces are required for the proposed development. The proposed provision of 218 spaces therefore complies with the Council's car parking requirements for residential flat buildings.

(6) Additional Unit Numbers

The additional yield appears to be achieved through 1 bed + studio type units and represent one third of the mix. This is an issue if these rooms are not designed to be a single bedroom unit with flexible internal space and are instead designed and presented as a de facto two bedroom unit.

As identified above, the Concept Approval did not grant consent to a fixed number of apartments, rather it granted consent to building envelopes that translate to a particular dwelling yield dependent on the size and mix of dwellings.

The modification seeks to make minor amendments to the approved building envelopes, alter the floor layouts of the indicative concept plans to provide a more efficient floor layout including smaller unit sizes.

The "1 Bedroom + Study" unit type is a legitimate type of unit providing greater flexibility in the use of apartments as promoted by Part 03 "Flexibility" of the Residential Flat Design Code.

(7) 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.

This is a matter to be assessed at the detailed DA stage. Notwithstanding this, the lightwells are considered appropriate for the following reasons;

- They allow for cross flow ventilation to an additional 50 apartments.
- There is no overlooking into other apartments. This has been achieved by directing the windows in particular orientations and providing for translucent glazing where necessary.
- They provide visual depth to the study areas. It is noted that a feature wall will be provided to the southern side of the lightwells.
- They provide natural light to the study areas.
- They provide some natural light to the kitchen area.
- They do not have any mechanical discharge into these areas – i.e. there will be no odours.

Furthermore, all lightwells are directly accessible from the lobby which will enable easy access for cleaning and maintenance.

The proponent's submission claims that the additional units are provided while still enabling compliance with the objectives of SEPP 65 and objectives and Rules of Thumb of the

This issue is addressed below in relation to the Urban Design Comments

Residential Flat Design Code 2002. However there is some concern that the amended design is less compliant

(8) Urban Design Review Panel Issues

All of the issues raised by the Urban Design Review Panel at the pre-DA meeting relate to the detailed design of the development and are issues that will be assessed by Council and the JRPP in their assessment of the detailed DA.

Notwithstanding this, our responses to each of the Urban Design Review Panel comments (which have been included in the DA documentation lodged with Council) are provided below for information.

a) 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 studies are a legitimate room type and an appropriate use, with light and ventilation via the lightwells.

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

This internal space is a small study and benefits from light and ventilation off the living/dining room and is compliant with the BCA.

b) 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.

The bedrooms of all single aspect units were amended in response to this issue and the s75W and DA plans include an operable window in the external wall, addressing this concern.

c) 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.

This is a matter to be assessed as part of the detailed DA and is not a matter for the S75W Modification Application.

Notwithstanding this, it is acknowledged that the natural cross ventilation calculations in accordance with the Residential Flat Design Code currently include single aspect units that benefit from access to the lightwells.

However, the proposal can be readily amended to meet the required 60% natural cross ventilation Rule of Thumb of the RFDC, through the inclusion of operable skylights in the upper most apartments, should Council and the Panel be of the view that the lightwells cannot be included.

d) Sun shading

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.

All apartments and the development as a whole meet BASIX requirements. The openings on Buildings B,C and D are highlight windows and are relatively small in size that do not require screens. The western windows to Building D have an extruded 'hood' that extends 300mm

e) Elevations

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

As identified above, the design of the development was amended to address this concern and operable windows were incorporated in the external wall of the bedrooms.

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 North Elevation facing Epping Road, and to a lesser extent the West Elevation facing Lane Cove Road, have been designed in response to an edge condition which is different to the other elevations. These two facades face onto high traffic streets and have a scale and massing which responds directly to its character. The base of these facades has high quality landscaping in response to a more pedestrian scale. It is our view that the design of these facades are appropriately scaled and detailed and contain a suitable variation of material.

(9) The traffic generated by the additional car parking will have an impact on Allengrove Crescent and the surrounding street network.

The issue traffic and parking has been addressed in the Traffic Impact Assessment submitted with the current modification application and was previously addressed as part of the Concept Approval.

The Traffic Impact Assessment has concluded that there is adequate capacity in the surrounding road network to cater for the traffic generated by the proposed development.