

**CONSIDERATION OF DEVELOPMENT PROPOSAL
566-594 PRINCED HIGHWAY KIRRAWEE**

ARAP MEMBERS IN ATTENDANCE AND REPORT AUTHORS:

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1.0 BACKGROUND

A development proposal (pre-DA) for this site was presented by the proponent (Henroth Developments) and their design team to ARAP at Council offices on 09 May 2013. A Concept Plan (MP10_0076) had already received approval on 23 August 2012 (subject to conditions under Pt 3A of the EPA Act) by the Planning Assessment Commission (PAC), acting on delegated authority of the Minister for Planning and Infrastructure.

ARAP prepared a Report on the submission, noting that the PAC approved Concept Plan effectively constrained the Panel from making a meaningful contribution to the key planning issues of the site and its development. Notwithstanding, the ARAP Report offered a considered view of the planning merits and issues of the proposal. This Report provides a useful context and background, where many of the issues raised remain salient to the new proposal for this very significant site.

The site was subsequently sold to Payce Developments, who commissioned a new design team to develop a new planning proposal submitted as an amendment to the PAC approved Concept Plan.

On 25 February 2014 ARAP attended a round-table meeting with Council planning staff to review the new proposal, now referred to as South Village_Kirrawee – Part 3A Concept Plan Amendment (s.75W). Documents supplied and reviewed were prepared by Turner, the new architects and Sutherland+Associates, the project planning consultant.

ARAP have been asked to prepare comments that may assist in the formulation of a response to the proposal by Council to the Department of Planning. This Report has therefore been written with this intention, rather than the more standardised format structured by the SEPP65 Heads of Consideration.

2.0 EXECUTIVE SUMMARY OF KEY ISSUES

ARAP have formed a view that an overall development proposal of this scale and density is not appropriate for this site. There is however a case for some increase in density to align with that proposed in Draft LEP 2013, subject to the matters raised in this Report and by Council's technical staff being addressed and resolved by the proponent. The site is highly significant to Sutherland Shire owing to its location, size and features. How it will ultimately be developed is an important litmus test for the future urban character of the LGA.

The proposed amendment addresses some of the site design and amenity issues inherent in the approved proposal, however it also raises additional issues and creates other problems. ARAP do not believe that the new proposal should be considered as an amendment to the PAC approved Concept Plan, given that the proposed envelopes and development density substantially depart from the approval.

There are four primary aspects of the proposal that require fundamental consideration and agreement between the authorities and the proponent:

- A consolidated position on increased density must be expeditiously agreed for the site, taking into account the vision for future development of the Sutherland-Kirrawee precinct, the Shire and across the entire Sydney Metropolitan region.
- The necessity for sites of this size to be regulated, planned and designed so that they are fully integrated into their local environment and thus avoid the risk of enclave creation. Whilst the overall site planning layout for the amended proposal is an improvement on the approved concept plan, it also demonstrates basic flaws that arise from treating the site as one large development rather than a series of more diverse, smaller scaled developments.
- There must ultimately be a comprehensive demonstration that the proposed amendment creates a high level of environmental amenity for both residents and the public through good design and compliance with key controls.
- The substantial clearing of the Sydney Turpentine and Ironbark Forest (STIF) from this site is an unfortunate situation, and has reduced its potential as a key element in the wider green network. This is the result of poor planning and lack of recognition of these site values in the approved Concept Plan. The quality of the site's public open space and landscape, and how this is to be managed on similar sites in the future is therefore a primary concern.

In summary, if the proponent wishes to depart from the current controls and approvals, it is their responsibility to clearly demonstrate that the many and various environmental and amenity impacts arising from the proposed increase in density have been

comprehensively considered and addressed. The ARAP has the view that this proposed amendment does not provide that assurance.

3.0 BROAD PLANNING CONTEXT

One of the major shortcomings of submission presented to the Panel is a surprising lack of broad strategic and contextual analyses for this site, as the basis for making a reasoned development proposition.

In principle ARAP believe that in principle, higher density and provision of a diversity of uses are appropriate objectives for this site.

Increased density close to existing public transport and in particular, increases in quantity and choice of housing are highly desirable from the perspective of long term housing affordability: a major issue for Sydney and Sutherland Shire. Increased density must however be realised through good regulatory guidance, good planning, and finally good design.

4.0 LOCAL PLANNING CONTEXT

There is currently a lack of planning certainty in relation to the site's existing and possible future contexts. This makes it more difficult to assess individual development proposals such as this one: good and orderly development outcomes are far more likely to happen when there is a clearly articulated and agreed planning vision, framework and development controls in place.

The Kirrawee-Sutherland area has been previously considered as a possible Urban Activation Precinct by Council, and ARAP are very supportive of this stance given the proximity to both railway stations and the opportunities for higher density development in the immediate area.

It is highly desirable that a local area DCP, master plan or equivalent is prepared as soon as possible, to guide development in this area. This plan should address many of the issues raised by the new development proposal, including:

- definition and relationships between Sutherland Town Centre and Kirrawee.
- distribution of uses in the area
- zoning for increased density
- building height/density relationships
- local traffic access and the Princes Highway
- pedestrian and cycling connectivity
- green and open space network

5.0 SITE CONTEXT

Principles of connecting the site to its immediate context were discussed at length when the last scheme was presented. It was felt that it did not integrate well with the local streets due to the complicated internal access and built form geometries, lack of cross site physical and visual links and the setting of the main retail mall/arcade at a level below grade.

In contrast, this proposed amendment better integrates with street context, increasing visual and physical links across the site and establishing a new trafficable north south street along its new park edge. Importantly, the internal building geometry and layout has been made simpler and orthogonal, more legibly linking built form to the proposed street pattern and creating improved and more compliant distances between buildings within the site.

While these are significant improvements, the scheme does not adequately address Flora Street with a continuous active street front. The central pedestrianised “link” remains below street level, accessed by a series of switchback ramps. This is poor design and disconnects the internal retail areas from Flora Street.

The amendment proposes that a new diagonal pedestrian path and playground is built between the SW corner of the site and the new retail plaza, presumably to improve pedestrian connectivity with the Kirrawee commercial strip. Whilst this connectivity is a good principle, in this location it impacts on what remains of the significant landscape heritage of the site. Pedestrian connectivity to Kirrawee shops could and should be achieved along Flora St.

6.0 SITE PLANNING PRINCIPLES

Many of the weaknesses of the previously approved scheme flow from its lack of commitment to a legible and integrated urban environment – most importantly, an interconnected and unambiguously public street network, with all buildings clearly addressing the streets. The adoption of such an urban street and block approach to development allows a number of desirable outcomes:

- integration of the site into the existing context;
- provision of a public setting to break up the development into blocks allowing variation in design and character, ideally undertaken by different architects, thus avoiding the sense of an homogeneous enclave;
- the possibility of a clear sense of address and clarity of access for all dwellings; and
- a simple way of staging development for large sites in single ownership.

On first impression the amended proposal appears to align itself with such an urban approach. Describing itself as 'a series of urban blocks' in contrast to the 'super block approach' of the existing approval, it appears to have the desirable characteristics that this approach makes possible. It seems to break up the site and integrate it into the geometry of the surrounding street pattern, to be more permeable, and to enhance the public domain.

On examination at a more detailed level, it becomes apparent that many of the weaknesses of the approved scheme are still present in the amended proposal:

- the absence of considered design and clearly defined character in the public spaces;
- private car ramps disappearing down supposedly public streets;
- the lack of a sense of address for all dwellings to a public street and the difficulty in finding front doors to dwellings; and
- ultimately the sense of a large, homogeneous enclave, designed by one hand.

Urban Blocks

As noted above, the conceptual intent of the proposal as a 'series of urban blocks' rather than a 'superblock' is a worthy one. The proposal, however, is in effect a series of smaller superblocks containing many more apartments with some difficulties of the approved concept plan scheme still present, if not exacerbated due to the large increase in proposed floorspace.

The approved scheme has seven entry lobbies at street level serving 45,505m² of residential area. The proposed amendment has six lobbies at street level serving 70,810m² of residential area. This is of significant concern.

Looking at the block to the south east of the site, where one public residential lobby serves the entire block, all the problems of address and finding front doors are still present: the public lobby at Flora St would need another lobby to deal with the number of post boxes generated by the block, and the journey from the lobby at podium level may require a concierge and porters to help non-residents find their way across the podium to their respective sub lobbies.

Public Domain

The intent of the amended proposal to enhance the public domain through a variety of new genuinely public streets in addition to the park has potentially great merit.

For this approach to be successful, the streets must be thought of as critically important public spaces in the project; their design and quality being as important as the buildings. These public spaces set the true integrating framework for the development and add value and return to the development, if executed properly.

They are the key ways the proposal can avoid the sense of an enclave and achieve integration into the existing context. They must be planned with a developed understanding of how to design and choreograph a network of successful streets.

A common problem of large site redevelopment by single owners is that there is a tendency to create enclaves where the site's public domain is disconnected from the surrounding areas to create a sense of exclusiveness. Good contemporary urban design practice in cities everywhere reveal that this thinking is fundamentally flawed; one that is guaranteed to isolate the development and its residents from the wider community.

A relatively simple solution is that the local authority must control and direct the site planning strategy and the detailed execution of its public domain. By way of local exemplar, Sydney City Council have demonstrated at Green Square and surrounds that large industrial sites can be planned this way, to both the public and developers benefit. The new thoroughfares and public spaces that divide up these large sites create many benefits, including fine residential grain, opportunities for a rich typology of building types, architectural diversity, and staging benefits, to name a few.

Critical to the process is that the local authority and developer collaborate, agree to site planning subdivision and the authority provides the detailed design requirements for the public domain ensuring that it seamlessly integrates into the surrounding areas. The strategy may but does not necessarily require separated basements: a possible solution is for the street to be owned in stratum by Council with continuous basements located below. Resolution of utility services requirements and generous landscaping provisions are key considerations, as is the resolution of the important question of who ultimately controls and maintains the streets.

One would expect, if this approach were adopted, to see an indication of these considerations: street sections setting out urban design principles and perspectives, as well as an elaboration of the character and nature of each of the public spaces.

There is not yet enough evidence in the supplied documentation that integration of the public domain has been carried out with the necessary intent or rigour.

The architects, for instance, conceptualise the proposed north/south retail street as a 'pedestrian high street' (contrasting it with the 'internalised retail arcade' of the approved scheme). The landscape architects refer to this space as a 'pedestrian lane' (coupling it with the adjacent 'public plaza'). These are very different urban types. The perspective provided of the retail plaza looking down this street presents it as neither a pedestrian high street nor a pedestrian lane. The street and the plaza merge and appear more as a shopping centre without a roof, with a somewhat ambiguous series of pergola type elements overhead.

Examining this pedestrian street further, it ends on its southern side with a switchback pedestrian ramp to Flora street and on its northern side with a series of car parking spaces forming part of the new east/west street, with neither situation providing a satisfactorily conceived link to the adjoining streets. The further connection of this north-south corridor to the Princes Highway, offset from the axis with a private car ramp disappearing down half its length, is a left over space adding nothing of value to the public domain.

All the public spaces have similar problems on closer examination. The Panel made a recommendation for the previous scheme on this site that a public domain designer be engaged to concentrate on the environmental quality of these spaces. Regardless of who undertakes this work, the amended proposal would benefit immensely from a specific and cultivated consideration of the design and quality of the public domain and its integration into the scheme. These spaces should be considered as truly public places, and their quality and character should be maintained and defended through the design and implementation of the project and not left to be compromised or reduced by requirements or perceived efficiencies in the private areas of the development: an outcome that would ultimately be self-defeating.

7.0 DENSITY

This is a key and vexing issue for this site. The following extract from the consultant planning report compares some key development metrics for the approved Concept Plan and the proposed amendment:

| | Approved | Proposed | Notes |
|-----------------|--------------|--------------|----------------|
| GFA Total | 60,735 sqm | 85,000 sqm | |
| GFA Residential | 45,505 sqm | 70,810 sqm | |
| GFA Retail | 15,230 sqm | 14,190 sqm | |
| Height | 50m max | 50m max | |
| Carparking | 1,150 spaces | 1,566 spaces | |
| FSR | 1.43:1 | 2:1 | ** Refer below |

The site area breakdown and zoning is as follows:

| | LEP2006 | DRAFT LEP2013 |
|------------------|------------|-------------------------------------------|
| TOTAL SITE AREA | 42,542 sqm | Z.7 Mixed Use Kirrawee |
| PARK AREA | 9,000 sqm | Z.13 Pub Open Space |
| DEVELOPMENT AREA | 33,542 sqm | Z.B4 Mixed Use Z.RE1 Public Recreation |

There is some confusion in relation to the proposed FSR and how it has been applied. In some instances the entire site area has been nominated as the basis for FSR calculation,

in other instances the dedicated park area has been excluded. Based on above areas, the following comparisons can be made:

| | FSR/Total Site Area (ie incl. Park area) | FSR/Mixed Use Zone (ie excl. Park area) |
|-----------------------|---------------------------------------------|--------------------------------------------|
| LEP 2006 | 1:1 | 1.27:1 |
| DRAFT LEP 2013 | 1.58:1 | 2:1 |
| APPROVED CONCEPT PLAN | 1.43:1 | 1.8:1 |
| PROPOSED AMENDMENT | 2:1 | 2.5:1 |

What may be inferred from the above is that the Draft LEP2013 offers a **higher** FSR than the PAC-approved Concept Plan, and in turn that the proposed amendment offers a **higher** FSR than Draft LEP2013.

As to the question of what is a reasonable FSR for this entire site given its location, accessibility and potential to create a sustainable urban community for the future, ARAP have the view that the Draft LEP control of a **maximum FSR of 2:1 applied to the developable site area** (ie the Mixed Use Zone) is reasonable and consistent with many other medium density contemporary residential developments across Sydney. It should be noted that this would provide the developer with a 10% increase in FSR over and above that provided in the PAC-approved concept plan and scheme (FSR 1.8:1).

This opinion is offered on the proviso that the planning proposal must demonstrate its capacity to meet contemporary legislated standards of environmental amenity.

In regard to the proposed amendment, ARAP's view is that it **does not demonstrate this capacity** in a number of key areas principally because of the proposed density of the scheme. These are discussed further in this Report.

8.0 SCALE, BUILDING HEIGHTS AND SETBACKS

The ARAP recognises that taller buildings are contentious in Sutherland Shire, as they are in many similar LGA's across Sydney. However, quality environmental and living amenity outcomes in higher density contexts are achieved by a range of considerations, including instances where it can be demonstrated that environmental amenity is improved by increase in building height.

Whilst the current planning amendment proposal complies with the 50 metre overall maximum height limit established by the PAC Concept Plan and proposed by Draft LEP 2013, it should be evident that the proposed 40% FSR increase from 1.43:1 to 2:1 must result in a much denser volume of built form across the site within this height limit.

Whereas the approved Concept Plan located the tallest buildings at the centre of the site, the proposed amendment more than doubles the height of buildings along the Flora Street frontage. Whilst this may be good for open space within the site, it results in substantial solar amenity impacts within the public street corridor and significant overshadowing of sites across the street.

Council have recently indicated that Flora Street may become a landscaped, pedestrian-friendly connection between Kirrawee and Sutherland Town Centre. The proposed increase in street edge height to 8/11/14 storeys will have a major detrimental impact on this. There is a balance to be considered between amenity in the existing public domain and that proposed within the site. Buildings of this height without any significant upper level street-edge setback and change in architectural character will create a street with an over-scaled, quite oppressive northern edge that is without precedent in Sutherland Shire.

To address this, ARAP suggest that a range of other built form options that include locating taller buildings in other locations on the site should be considered.

Tower locations could be used to express significant nodes and places, to increase urban legibility and more clearly refer to the site's local and greater context. For example, it could be that a taller building on the corner of Oak Road and the Princes Highway would signal a threshold to the Kirrawee Station Town Centre.

In regard to the treatment of the sites eastern boundary, the proposed amendment is very different to the approval, which does not have built form stacked parallel with the boundary, is of lower height, and does not propose units facing east towards the boundary.

The new proposal has 7/8/11/12 storey unit blocks along this edge. Some of these have units facing east towards the boundary, which the RFDC requires 24m separation to similar residences opposite. It is likely that the two adjacent sites to the east will be re-developed in similar fashion at some point, and a similar setback on these sites would allow for a new 20m wide landscaped north-south street to be constructed. ARAP therefore have the view that the eastern side boundary setback should be 12 metres, not 8 metres. This street would improve amenity and provide good building address and fine grain.

Unfortunately the ground level plan indicates a blank wall to a delivery corridor for the supermarket. This is a symptom of the lack of a master plan for the area or consideration of its future character beyond the site boundaries.

9.0 PROPOSED USES

The ARAP is strongly supportive of a range of uses across the site, including public open spaces that are designed with clear expression of their typological character.

The relationship of the proposed retail to the existing Kirrawee shops and beyond with Sutherland Town Centre is an important matter to be considered. The Kirrawee retail strip is a very pleasantly scaled and landscaped streetscape that appears to support a number of thriving local businesses including cafes and restaurants.

There is a concern that the new retail (unspecified concession types) on the site will undermine the Kirrawee shops. The proposed supermarkets will presumably also attract supplementary retail that will compete directly with Kirrawee.

The Panel has been advised that another large supermarket is planned opposite the site. Notwithstanding the commercial motives, removal of the large supermarket from this proposal should be considered, as it would reduce floor-space, reduce car-parking and dramatically simplify planning of the south-eastern development block.

There is also concern with the basic nature and feel of the retail area – what is it, is it a mini-Mall, a laneway or a small plaza? It feels disconnected from the street, and its retail relationship to Flora Street is unclear. The main supermarket appears to be well above the footpath and therefore not accessible from the street. There is a low retail level “squashed” below it that feels disconnected. As described in detail previously, the key to resolving this is to develop a clear vision about the public domain typologies and integrate the retail with them. A greater focus on Flora Street for retail should be considered.

10.0 LANDSCAPE AND TOPOGRAPHY

This submission highlights the inherent problems in modifying previously approved submissions without the full background information about the site, its history, the site constraints and other forms of documentation. It would appear that the new owner/proponent has merely used the PAC’s Determination summary without referring back to the original site reports. As a result there are some important errors which ignore Sutherland’s intention to connect this area to Sutherland Town Centre as well as contravening some relevant acts, in particular, the *NSW Threatened Species Conservation Act 1995* (NPWS 2002a, NPWS 2002b) and the *Commonwealth Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act). <http://www.environment.nsw.gov.au/determinations/SydneyTurpentineIronbarkForestEndComListing.htm>

The Kirrawee Brick Pit is an important site in the Sutherland Shire for a number of reasons.

- It occupies a highly visible ridgeline location along Princes Highway.
- It contains significant site heritage; namely:
 - An intact stand of Sydney Turpentine Ironbark Forest (STIF) of trees, shrubs & undergrowth, plus associated fauna
 - The use of Wianamatta Shales for the manufacture of bricks (note, acknowledgement of this has added to the character of other developments in former brick works such as St Peters Brickworks and Sydney Olympic Park brick-pit.
 - The remnants of the excavation in terms of the residual excavation banks and some remnant infrastructure.

It is a large site which can accommodate a diversity of uses including protection of an endangered ecological community and the integration of industrial site heritage.

Given the site's importance, the following comments relate to the proposal as submitted.

Inadequate Recognition of STIF under the *EPBC Act, 1999*

A strong component of the previous pre-DA submission was the recognition of the environmental heritage significance of the existing Sydney Turpentine and Ironbark forest (STIF) in the south-west corner of the site including the western and southern site boundaries and street planting. At the time of the PAC approval, this was one of the few intact Endangered Environmental Communities in the Shire.

The Threatened Species Conservation Act made a Final Determination to list the Sydney Turpentine-Ironbark Forest as an ENDANGERED ECOLOGICAL COMMUNITY on Part 3 of Schedule 1 of the Act, noting that

- STIF typically occurs on areas with clay soils derived from Wianamatta Shale, as occurs on the Kirrawee site.
- Those STIF communities with a dense understorey in areas that have not been burnt for an extended period of time, as occurs on the Kirrawee site, are of even greater ecological significance, particularly because of the seed bank in the soil.
- Only small areas of STIF are presently included in conservation reserves, so remnant pockets of relatively undisturbed communities are of prime importance.
- Identified threats are clearing, physical damage from recreational activities, rubbish dumping, mowing, weed invasion. The location of proposed parkland in the SW corner of the site is inappropriate for the endangered community.

In view of these threats, the Scientific Committee is of the opinion that Sydney Turpentine-Ironbark Forest in the Sydney Basin Bioregion is likely to become extinct unless the circumstances threatening its survival cease and that listing as an endangered

community is warranted. The current amended proposal contravenes the *EPBC Act (1999)* in a number of ways

- It suggests access to Oak Road through the habitat,
- It has changed the relationship of the excavated banks and associated root development and water regime by filling the lake and creating a new lake to the north.
- It proposes a playground in the middle of this endangered habitat.

Relationship to Sutherland Council's Proposed Master-plan for the Precinct

The Council's master plan for the Precinct designates Flora Street as a major link to Sutherland Town Centre; intended to be an attractive tree-lined pedestrian spine that is the visual and functional link between Kirrawee and Sutherland. The existing low scale industrial premises on Flora Street to the south and east of the brick pit will be redeveloped to create a new high street.

The current proposal undermines this master plan by creating a major link to Oak Street instead of Flora Street. No access to Oak Street should be allowed through the STIF conservation area.

The current plan also does not adequately recognise the existing trees along Flora Street that are an important component of the south west STIF community.

Rationale for Analysis and Concept Development

The landscape report supporting the modifications to the concept plan lacks the background information needed to justify the suggested amendments; as a result a number of inappropriate changes have been proposed. These mostly relate to the lack of recognition of the constraints engendered by the STIF conservation zone and its associated banks of the brick-pit plus existing water regime. A site analysis should reveal

- The extent of the STIF conservation area, including the trees on Flora Street
- Limited access to conservation zone and no through access
- The retention of the water body in the south-west part of the site and the maintenance of existing water levels
- No park infrastructure within the conservation zone
- The public park be located north of the conservation zone

Staging

The proposed staging does not recognise the importance of the STIF conservation zone. Stage 1 should include the STIF area protection to ensure no site works occur in this area

Landscape

The landscape report is inadequate. It does not indicate any site analysis and associated constraints. The requirement to protect the STIF vegetation and undertake bushland restoration needs to be addressed, including the location and plans for compensation planting. The sections are not informative. The tree species selection will NOT augment the STIF vegetation. It is important to ensure the tree planting along Flora Street is protected and reinforced as much as possible to restore the Green Web for existing fauna.

The existing brickpit topography is a strong component of the site heritage and should be incorporated into the landscape design in a similarly inspired way as other brickpit designs in Sydney.

The design for the communal courtyards has some problems:

- The smaller courtyard has a generous sundeck in permanent shade of a tall building.
- The access paths in the larger courtyard are most confusing and are likely to generate an unfortunate proliferation of signage.

11.0 TRAFFIC AND CARPARKING

The amendment proposes an increase in on-site parking from 1,150 to 1,566 car spaces.

Whilst the site is more “connected” to adjacent streets by the introduction of the north-south Park-edge street, access points to the basement car-park ramps remain essentially as per the approved plan. This must be reviewed from a traffic management perspective, including impacts on the local street network of an additional 416 vehicles.

It is noted that the proposed entry slip lanes along the westbound highway have increased in length along the site’s northern boundary. This has effectively occupied the space and entire width of the existing public footpath, and reduced the width of any buffer zone or separation between the carriageway and the northern facades of residential blocks A and C.

Is it acceptable to relocate a public footpath onto private land?

The upper level car park sandwiched between the proposed supermarkets and the upper level access courtyard below Buildings D and E is an unusual planning idea, and questionable in that it complicates resident access to the buildings and results in a loss of building identity at street level.

How are service and furniture removal vehicles to be accommodated? What is the garbage collection strategy? There appears to be one centralized basement garbage

room, which presumably is for the supermarkets. There is no indication of how garbage for 750 new apartments is to be managed and collected.

The streets should be made more public in character and less like vehicular access paths. Ramps should be more integrated and relocated into buildings; 90 degree parking should be removed and replaced with parallel parking, footpaths and street-like landscapes; all links and side boundary setbacks should be considered as public streets either now or in the future.

12.0 SUSTAINABILITY AND APARTMENT AMENITY

The Panel acknowledges that the proposal does not yet provide a sufficient level of detail to comment on these aspects in depth, however make the following comments.

While SEPP65 objectives and the key RFDC's rules of thumb for solar access, cross ventilation and limited south facing units appear capable of being generally achieved, it is a concern that all proposed buildings feel large with central double loaded corridors, impacting heavily on the site and surrounding urban fabric.

There does not appear to be a wide enough range of dwelling types for a development of some 750 housing units, resulting in a perception of pervasive uniformity for this development when diversity would yield a better and richer outcome.

Living with so many neighbours is not ideal; it may be better to offer some choice by having at least some smaller buildings and more smaller lobbies.

Access to a great number of apartments is circuitous and obscure, and requires unprotected walking across upper podium levels around landscaping that seems not to recognise issues of way-finding, legibility, safety or comfort. This can be dramatically improved by making more public streets around the urban blocks, distributing more lobbies around those streets and (where podium access is unavoidable) designing podium landscapes and especially edges of buildings at podium level as walkable, protected galleries.

In terms of safety and security, the proposal feels cut off from its context and lacking in the public accessibility and legibility that would ensure the safety and security of its future context.

Apartments facing north to the Princes Highway will require consideration of visual, aural and pollution control.

13.0 AESTHETICS

The Panel acknowledge that the proposal does not yet provide a sufficient level of detail to comment on aesthetics in depth, however make the following comments.

Building facades appear to be generally well conceived as is to be expected from the proponent's architect.

However, if the many buildings on the site are to be designed by the same architect this raises a major design issue for this development and others like it that will follow.

Whilst the images and elevations are obviously preliminary and indicative, it is clear that the aesthetics of the development are likely to be constant and repetitive in character, and lacking the true diversity and fine residential grain that comes from having a number of different designers engaged on the project.

This comment relates directly to the lack of diversity in housing typology referred to above. A wider range of housing types would naturally create different scales and rhythms that would be amplified by a range of different design hands to enhance the character of the development and make it more city like – a mixed use, diverse, vibrant and ultimately sustainable urban place.