Hawkesbury City Council

attachment 1
to
item 3

SEPP 65
Assessment

date of meeting: 21 March 2019
location: Council Chambers
time: 11:30 a.m.

OCP ARCHITECTS

197 WINDSOR STREET

RICHMOND, NSW, 2753

SEPP 65 PEER ASSESSMENT REPORT

For Hawkesbury City Council

Job No 12004

Issue B – FINAL – February 2018

Report Register

The following report register indicates the development and issue number of this report, undertaken by OCP Architects.

Document status:

Issue	Date	Purpose	Written	Approved
A	February 2018	Draft Issue to Hawkesbury Council	BH	OC
B	February 2018	Final Issue to Hawkesbury Council	BH	OC

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1 INTRODUCTION

OCP Architects have been engaged by Hawkesbury City Council to undertake a review of the proposed development at 197 Windsor Street, Richmond in accordance with *State Environmental Planning Policy 65 – Design Quality of Residential Apartment Development* (SEPP 65) urban design assessment of the proposed development.

The proposal seeks approval for the construction of a mixed use development consisting of 6 residential apartments, ground floor parking, shop extensions and two new retail spaces fronting the laneway/ public car park at the rear of the site.

1.1 Purpose of this Document

This report aims to:

- Describe the existing site and the context
- Describe the proposed redevelopment of the site
- Provide an assessment of the proposed works in relation to the urban design principles set out in Schedule 1 of SEPP 65 and Council's development controls.

1.2 Site Identification

197 Windsor Street is located on the northern side of Windsor Street, directly opposite Richmond Park. The real property description for the site is Lot 2 of DP 556754.

Figure 1.1 - Map showing the location of the 197 Windsor Street, Richmond on the northern side of Windsor Street, directly opposite Richmond Park. The site is bound in red. (Source: SIX Maps 2016)

Figure 1.2 - Aerial photograph of the subject site, bound in red. (Source: SIX Maps, 2016)

1.3 Methodology

OCP Architects have conducted a desktop review of the documentation submitted as part of the development application. As part of this assessment, OCP Architects have also undertaken a contextual analysis of the site and have reviewed the design principles set out under Schedule 1 of SEPP 65, Council's development controls and the desired future character of the area as set out in the Development Control Plan.

1.4 Basis of this Assessment

The material upon which this assessment of the proposal is based are the development application documentation which is as follows:

TITLE	AUTHOR	DATE
Architectural Plans, Rev A	Design Cubicle Architectural Solutions	14/11/2017
Colour Schedule	Design Cubicle Architectural Solutions	undated
Design Verification Statement	Design Cubicle Architectural Solutions	11/12/2017
Statement of Environmental Effects	Cityscape planning + projects	December 2017

Statement of Heritage Impact	Perumal Murphy Alessi Heritage Consulants	December 2017
Arborist Report	Redgum Horticultural Aboriculture and Horticulture Consultants	20/12/2017
BASIX Report	Green Star Energy Solutions	11/12/2017
Acoustic Report	Rodney Stevens Acoustics	16/11/2017
Traffic and Parking Assessment Report	Varga Traffic Planning Pty Ltd	19/12/2017
Stormwater Concept Design, Rev A	SGC Consulting Engineers	28/08/2017

1.5 **Authorship**

The report was prepared by OCP Architects Pty Ltd, written by Bianca Hollo, Urban Planner and Heritage Consultant, and reviewed by Otto Cserhalmi, Principal.

2 CONTEXT AND SITE ANALYSIS

2.1 Context

Richmond is located approximately 63km north-west of the Sydney CBD and is connected through a network of roads radiating from the town centre, including Windsor Street (Hawkesbury Valley Way), Blacktown Road, Londonderry Road, Castlereagh Road and Kurrajong Road. Richmond is town centre is located approximately 6.5km to the west of Windsor and is serviced by the T1 North Shore and Northern Line trains. The railway station at Richmond is located approximately 250m to the north-west of Richmond Station.

Richmond Town Centre extends along Windsor Street between Toxana Street to the east and Bosworth Street to the west. The form of the land is relatively flat.

Richmond is one of the five towns developed from 1810 by Governor Macquarie and exhibits a high degree of integrity with numerous planned and architectural elements dating from this period. The town retains its original plan which was devised by Governor Macquarie which features a town square established around a centrally located park (Richmond Park). The grid plan of streets also date from this period.

The character of the town centre is enhanced by Richmond Park, directly opposite the subject site, and a number of distinguished historic buildings, many of which are listed as heritage items on the Hawkesbury LEP 2012 and the State Heritage Register (SHR) under the *Heritage Act 1977.*

The Richmond Town Centre is predominantly characterised by single and two storey buildings with flat, hipped and pitched roof forms dating from a range of construction periods including early Colonial, Victorian, Federation, Inter War and the late-20th Century.

The heritage items in the vicinity of the site have been tabulated below.

ITEM NAME	ADDRESS	LISTING STATUS	LISTING NUMBER
Richmond Park Pavilion and Statue	180 Windsor Street	HLEP 2012	I01808
Royal Hotel	167 Windsor Street	HLEP 2012	I131
House	179 Windsor Street	HLEP 2012	I112
Shop	187 Windsor Street	HLEP 2012	I113
Commercial Hotel	193 Windsor Street	HLEP 2012	I114
Shop	201-205 Windsor Street	HLEP 2012	I115
Westpac Bank	237 Windsor Street	HLEP 2012	I116
Richmond Post and Telegram Office and Stables	286 Windsor Street	SHR	01410
Richmond Court House and Police Station	288 Windsor Street	HLEP 2012	I121

Figure 2.1 - View west along Windsor Street, showing Richmond Park on the left and a number of single and two storey buildings on the right. The location of the site is indicated by the red arrow. (Source: Google Streetview Feb 2017)

Figure 2.2 - View east along Windsor Street showing the Richmond Post Office on the right and a number of single and two storey commercial buildings on the left. The location of the site is indicated by the red arrow. (Source: Google Streetview 2017)

Figure 2.3 - View north from March Street across Richmond Park towards Windsor Street showing the location of the subject site, indicated by the red arrow. (Source; Google Streetview Feb 2017)

Figure 2.4 - View west from East Market Street looking along the rear lane towards the public car park. The predominant scale of buildings fronting this section of the lane is one storey. (Source: Google Streetview Feb 2017)

Figure 2.5 - View east from West Market Street looking along the rear lane towards the public car park. The predominant scale of buildings fronting this section of the lane is one storey. (Source: Google Streetview Feb 2017)

2.2 The Site

The subject site is located on the northern side of Windsor Street, directly opposite Richmond Park. The property is bound by Windsor Street to the south, a two storey commercial hotel to the east, a single shop as well as a single storey building containing three shops to the west and a laneway and public car park to the north.

The site is relatively flat and has an area of approximately 885.2m^2. The property currently comprises a single storey building with two shops on the southern portion of the site facing Windsor Street. The main building on the site is a single storey brick building with a metal roof, likely to have been constructed in the late-20th Century. The rear portion of the building is constructed of concrete blocks, also contained under a metal roof. A number of ancilliary structures are present on the eastern boundary of the site. The rear portion of the site is a vacant hard paved area.

The site is zone B2 – Local Centre under the Hawkesbury Local Environmental Plan 2012 (HLEP 2012).

Figure 2.6 - View of the site from Windsor Street. (Source: Google Streetview Feb 2017)

3 DESCRIPTION OF PROPOSAL & RESPONSE TO CONTROLS

3.1 The Proposal

The proposed works involve the construction of a four storey mixed use building with six two bedroom residential units and two retail spaces on the ground floor fronting the rear lane and public car park. The proposal also involves the extension of the existing shops on the southern portion of the site to accommodate a new shop and a car parking area accessed from the rear lane.

* It should be noted that the proposed works are incorrectly described on the Development Application Form. The proposal is described as being for a mixed use development with only two additional retail spaces. The site currently accommodates two shops fronting Windsor Street. The proposed development shows a total of five retail spaces with two retail spaces incorporated in the mixed use development on the northern portion of the site and an additional shop (shop 3) at the rear of the existing shops on the southern portion of the site which is to be accessed from the rear lane via the internal car parking area.

3.2 Hawkesbury LEP 2012

3.2.1 Zoning Controls

The site is zoned B2 – Local Centre. The proposed development to construct a mixed use development is consistent with the LEP definition of 'shop top housing' which is permitted with consent in the B2 zone.

The proposed development is considered to be generally consistent with the objectives of the zone which are:

- *To provide a range of retail, business, entertainment and community uses that serve the needs of people who live in, work in and visit the local area.*
- *To encourage employment opportunities in accessible locations.*
- *To maximise public transport patronage and encourage walking and cycling.*
- *To promote the development and expansion of business activities to meet the optimum employment and social needs of Hawkesbury.*

3.2.2 Height Controls

The objectives of Clause 4.3 Height of Buildings is as follows:

a) *to protect privacy and the use of private open space in new development and on adjoining land,*
b) *to ensure that the bulk of development is not excessive and relates well to the local context,*
c) *to nominate heights that will provide a transition in built form and land use intensity,*
d) *to ensure an appropriate height transition between new buildings and heritage items.*

The height of buildings map contained within the HLEP 2012 provides for a maximum building height of 12m for the subject site. The main roof line of the proposed four storey building complies with the maximum permissible building height of 12m, however, the lift overrun exceeds the maximum building height by 600mm.

3.2.3 Heritage Controls

Clause 5.10 of the HLEP 2012 requires the consent authority to consider the impacts of development in the vicinity of a heritage item or heritage conservation area (refer 5.10 (5)(c)). The applicant submitted a Statement of Heritage Impact Report by Perumal Murphy Alessi Heritage Consultants, dated December 2017.

The design of the development, particularly the southern elevation, should be fine-tuned in term so the form, architectural detailing and selection of materials in order to appropriately respond to the surrounding context and the heritage items in the vicinity of the site.

Further discussion of the proposed development in relation to the existing neighbourhood context is provided in section 4 below.

3.2.4 Development in Areas Subject to Aircraft Noise

Clause 6.6 of the HLEP 2012 requires the consent authority to consider the acceptability of noise sensitive development situated within the vicinity of RAAF Base Richmond. The subject site is located in close proximity to the RAAF Base Richmond and is situated within the 25 – 30 ANEF Noise Contour.

The proposal to construct a mixed use residential flat building on the site would result in an increase in the number of dwellings and residents affected by the aircraft noise.

It is noted that Australian Standard AS 2021 – 2000 Acoustics – Aircraft Noise Intrusion Building Siting and Construction, includes Table 2.1 – Building Site Acceptability Based on ANEF Zones that prescribes the types of development that are considered acceptable having regard to aircraft noise exposure. This table provides that 'houses, home units and flats' are considered unacceptable land uses on land situated within noise exposure forecast areas that exceed 25 ANEF.

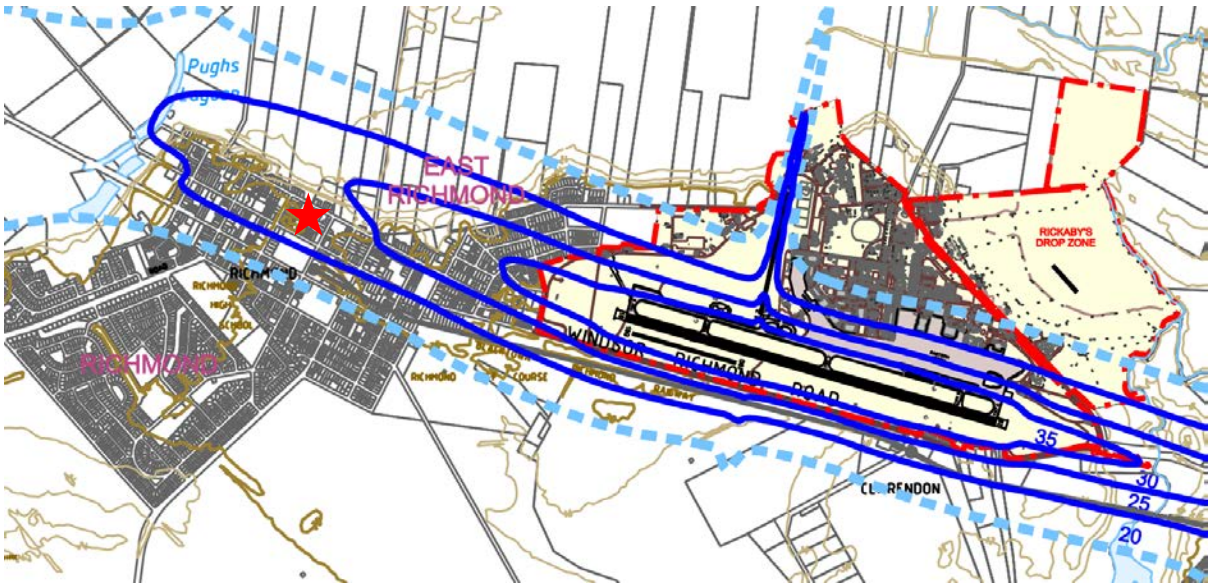

Figure 3.1 - Excerpt from the RAAF Base Richmond 2014 ANEF Summary Report, showing the ANEF zones and the approximate location of the subject site, indicated by the red star. The site is located within the ANEF 25 and ANEF 30 contours.

The Traffic Noise and Aircraft Noise Assessment prepared by Rodney Stevens Acoustics in November 2017 provides recommendations for the acoustic requirements for the proposed development based on an assessment of the site being located within the ANEF 20 – 25

contours. As the site is located between the ANEF 25 – 30 contours, further consideration is required in terms of the suitability of the site for this type of residential developments and the acoustic treatments that would be required to achieve an acceptable level of amenity for residents.

3.3 Hawkesbury DCP 2012

3.3.1 Part C General Controls

Landscaping

The proposed development includes minimal landscaping, consisting of a narrow planter in the undercover driveway off the rear lane of the site. This is not considered to be consistent with the objectives of the DCP in relation to landscaping. There is no consideration of screening, shade, drainage or the climatic benefits that would be provided by landscaping and trees on the site.

It should be noted that there is a tree at the northern end of the adjoining property which is very close to the property boundary and the footprint of the proposed four storey development. This tree should be retained with adequate measures to protect the tree during construction. An Arboricultural Impact Assessment was prepared for the site by Redgum Horticultural, dated 20 December 2017.

Car Parking

The proposed development provides a single car space for each residential unit as well as one additional residential car space. The DCP requires that each dwelling greater than 85m^2 be provided with two undercover car spaces. In addition, each development containing 3 or more units requires 1 additional car parking space for visitors per 5 dwellings. Given that the proposed mixed-use building comprises 6 residential units which are each 103m^2, the proposed development would need 13.2 car spaces to satisfy the DCP requirements for the residential units alone.

SEPP 65 states that development consent cannot be refused if the application satisfies the car parking requirements specified in part 3J of the Apartment design guide) (ref section 30(1)(a) of SEPP 65). Part 3J states that parking is to comply with the minimum requirements for residents and visitors set out in the *Guide to Traffic Generating Developments,* or the relevant development control plan, whichever is less.

The Guide to Traffic Generating Developments would require a minimum of 7.2 spaces for the residential units and 1.2 spaces for visitors to be provided for the residential component of the proposed development alone. Therefore, the proposed parking allocation of 7 spaces including 1 visitor space for the proposed residential units does not meet either the DCP or the SEPP 65 requirements for parking.

The proposal also provides one car space for each retail unit. The DCP requires that the 1 parking space be provided for each 30m^2 of retail GFA. Given that there is approximately 314m^2 of retail space (total retail space including existing and proposed), the proposed development would need 10.5 parking spaces to satisfy the DCP requirements for the retail uses alone.

As the proposal allows for a total of 12 car spaces, the development does not comply with the DCP requirements for parking.

The Traffic and Parking Assessment Report prepared by Varga Traffic Planning Pty Ltd. considers the parking spaces provided by the proposed development are adequate given

the close proximity of the site to the railway station, the location of the shops within an existing retail centre and thereby drawing on customers from 'linked trips', the close proximity to the existing public car park.

In addition to the above concerns relating to the number of parking spaces, the proposed parking spaces do not comply with the minimum dimensions for parking spaces and aisle widths for 90^0 angle parking. The DCP requirement and the proposed parking space dimensions are outlined in the tables below:

DCP Requirement:

PARKING LAYOUT	PARKING SPACE DIMENSIONS (M)	TRAFFIC FLOW	AISLE WIDTH (M)
90^0 angle parking	2.6 x 5.5	Two way	6.7

Proposed Development:

PARKING LAYOUT	PARKING SPACE DIMENSIONS (M)	TRAFFIC FLOW	AISLE WIDTH (M)
90^0 angle parking	2.4 x 5.4	Two way	5.8 – 6.1

Whilst not complying with the parking requirements outlined the DCP, the number of car parking spaces allocated for the residential units and retail spaces under the proposed development already results in a very tight arrangement with little space available for vehicle manoeuvring or for the provision of any other facilities on the site. Consideration should also be given towards the provision of adequate landscaping and some communal space for the amenity of the residential units which has not been allowed for under the current proposal.

Additional issues such as the provision of landscaping, shade and screening measures require further consideration.

Signs

No details have been provided in regards to signage as part of this development application, including consideration of how adequate signage could be provided for the proposed shop 3 at the rear of the southern building fronting the internal car park.

Energy Efficiency

The DCP requires the following minimum requirements for multi-unit residential buildings and shop-top housing:

- A certificate from an accredited assessor showing a minimum NatHERS rating of 3.5 stars plus -Unit Residential Buildings and Shop-Top Developments must submit an Energy Performance Statement (EPS)
- Ratings are to be provided for each typical layout and thermal exposure condition e.g. ground floor, middle floor, top floor, corner and middle units
- Hot water system/s minimum score of 3.5 stars
- Clothes dryers: 3.5 star greenhouse rating or greater

While it is acknowledged that the proposed development satisfies the BASIX requirements, further information is required in order to demonstrate compliance with the abovementioned energy efficiency and NatHERS ratings at the DA stage.

Further consideration should be given towards landscaping, methods of heating and cooling, water heating, selection of appliances, thermal design and insulation.

3.3.2 Part D Residential Development

Height, Setbacks and Development Fronting Rear Lanes

The proposed development has no setback to the rear and side boundaries. This is consistent with the existing form of development along Windsor Street and buildings fronting the rear lane.

It is noted that a maximum building height of 12m is permissible in the HLEP 2012. The DCP provides further restrictions on the height of buildings at the property boundary and the continuous length of boundary walls.

The DCP requires developments fronting rear lanes to be setback 5.5m from the property boundary. This standard relates to residential development in residential zones. As the proposal involves the construction of a mixed use development in a B2 Local Centre zone, the construction of the building to the lot boundary is acceptable. Furthermore, the proposed zero setback is consistent with the existing character of the area and the alignments of the surrounding buildings fronting the rear lane.

Landscaping

The DCP requires that all forms of residential development are to contain pervious soft landscaped areas to a total of 30% of the site area. The proposal provides a planter in the under-cover driveway area which comprises less than 2% of the site area.

As the proposal involves a mixed retail/residential land use in a commercial zone the 30% pervious soft landscape requirement would not be applicable in this instance. Nevertheless, the minimal provision of landscaping under the proposed scheme is not considered to be sufficient.

Private Open Space

Each unit is provided with two balconies. The north facing balconies have a minimum dimension of 3150mm will receive good solar access. As such, each dwelling is provided with sufficient private open space.

Visual Privacy

This section of the DCP is predominantly concerned with overlooking the private open space of adjoining dwellings. Due to the existing commercial use of the surrounding properties, the proposed development will not result in overlooking of any private open space. In addition, there are no windows on the east or west elevations facing the adjoining properties. However, additional considerations relating to privacy in relation to the amenity of the residents of the proposed units are discussed in Section 4.6 below.

Acoustic Privacy

The layout of the proposed units involve windows and balcony doors the bedrooms of each apartment facing the car parking area.

The Acoustic Report addresses traffic and aircraft noise. Further consideration should be provided in relation to the noise impacts generated by the internal car park on the bedrooms of the proposed units.

Acoustic Privacy is discussed further in Section 4.6 below.

External Noise and Vibration

A Traffic Noise & Aircraft Noise Assessment Report was prepared by Rodney Stevens Acoustics in accordance with the requirements of this section of the DCP. Refer to Section 3.2.4 above.

Safety and Security

The DCP outlines the following requirements for safety and security to be incorporated into the design of a building:

- doorway/entry safety and surveillance to and from the footpath;
- illumination of public spaces including all pedestrian paths, shared areas, parking areas and building entries to the relevant Australian Standard;
- visibility to the street from the front of the development;
- restricted access to the rear of the site.

Further information needs to be provided in relation to the lighting of the shops and footpath area fronting the rear lane, as well as lighting to the driveway and internal car park area.

The proposed four storey mixed use building will provide good visibility and casual surveillance over the rear lane and public car park.

The current proposal does not provide any restricted access to the rear of the site. The current proposal lacks any consideration of security which is of particular importance given consideration to the site's location adjacent to a licensed premises and public car parking area which may result in safety/security issues.

In summary, compliance with the LEP and DCP controls is partially achieved under the proposed scheme, however, there are a number of key areas of non-compliance or areas which require further consideration and additional information. These areas of concern are listed below:

- Ensuring that the proposed development does not adversely impact on the significance of heritage items in the vicinity of the site by achieving an appropriate built form, architectural detailing and materials (Refer to section 4 below);
- The provision of adequate parking;
- The provision of adequate landscaping;
- Further consideration and details in regards to signage;
- Further consideration of the potential impacts of the internal car parking area on the bedrooms of the proposed residential units;
- Further consideration of safety and security.

4 ASSESSMENT - SEPP 65 DESIGN PRINCIPLES

The following sections provide an assessment of the proposed development in relation to the nine design principles outlined in Schedule 1 of SEPP 65 – Design Quality of Residential Apartment Development. The principles have been included below in *italics* and are followed by comments provided by OCP Architects.

4.1 Principle 1: Context and Neighbourhood Character

Principle 1:

Good design responds and contributes to its context. Context is the key natural and built features of an area, their relationship and the character they create when combined. It also includes social, economic, health and environmental conditions.

Responding to context involves identifying the desirable elements of an area's existing or future character. Well-designed buildings respond to and enhance the qualities and identity of the area including the adjacent sites, streetscape and neighbourhood.

Consideration of local context is important for all sites, including sites in established areas, those undergoing change or identified for change.

Comment:

Richmond Town Centre is one of the five Macquarie towns established in 1810. The town centre retains a number of distinguishable characteristics of the original plan including the centrally located Richmond Park, grid plan layout of streets and a number of early Colonial public buildings. The town centre also retains a significant number of buildings from the Victorian, Federation and Inter-War periods, with some buildings from the late-20th Century. The predominant scale of buildings in the area is one to two storeys, however, it is acknowledged that the current development controls allow for greater heights and more dense urban development.

The four storey height of the proposed development sets a new precedent in the area. While it is acknowledged that a maximum building height of 12m is permissible under the current HLEP 2012 controls, any development on the site needs to sensitively respond to the existing neighbourhood character. The concentration of taller building heights at the rear of the site adjoining the public car park is supported. This approach is considered to be more appropriate given the existing character and heritage significance of the town centre and heritage items in the vicinity of the site. However, given the existing site conditions and context, a more detailed analysis of a number of different options for the redevelopment of the site would be beneficial in terms of arriving at the most appropriate site layout, building heights, bulk, form and scale for the site within its context.

The redevelopment of the site should focus on the site as a whole and should consider the scale, massing and appropriate layout and uses of buildings across the entire site. The existing 1-2 storey form and height of buildings along Windsor Street would allow for the construction of a two storey building fronting Windsor Street. This, in turn would allow for a reduced building footprint and a larger internal courtyard separating the two buildings on the site. If this option is considered, it would be beneficial to redevelop the site in unison with the owner of 199 Windsor Street.

The proposed works of the front part of the site needs to be re-considered. The extension of the existing ground floor areas and division of the ground floor into three separate shop tenancies and reduces street activation of the Windsor Street which would detract from the

existing high-street character of the Windsor Street. In addition, a retail/commercial tenancy with its principal access to the internal parking area is considered to be inappropriate as this area is overlooked by all of the bedrooms of the proposed units. The division of the site into three sections with all areas being accessible to the public will reduce the amenity of the development for the residents.

The site is visually prominent within the Richmond Town Centre due to the large open spaces provided by Richmond Park to the south and the public car park to the north, the existing low scale of development and the relatively flat land form in the area. The principal elevation of the proposed new mixed use building faces the rear lane and public car park. Consideration should also be given to the southern elevation. Whilst it is generally accepted that the lower two storeys of the southern elevation will not be visible from Windsor Street, the upper storeys will be visible and should appear as a recessive element (refer section 4.9 below).

Furthermore, the materiality of the building should relate to the existing materials present in built elements within the townscape. This is discussed further in section 4.9 below.

With adequate consideration of the built form, scale, architectural detailing and materiality of the building and the need for a high level of amenity, an acceptable outcome may be achieved for the redevelopment of the site which balances the existing character and heritage significance of the area with the desired future character of the area.

4.2 Principle 2: Built Form and Scale

Principle 2:

Good design achieves a scale, bulk and height appropriate to the existing or desired future character of the street and surrounding buildings.

Good design also achieves an appropriate built form for a site and the building's purpose in terms of building alignments, proportions, building type, articulation and the manipulation of building elements.

Appropriate built form defines the public domain, contributes to the character of streetscapes and parks, including their views and vistas, and provides internal amenity and outlook.

Comment:

The proposal involves the construction of a four storey mixed use building with a flat roof and overall cubiform appearance. The attempt of creating asymmetry in the northern elevation is supported as it breaks up the façade and creates smaller elements which relate better with the smaller scale of the existing surrounding development. Whilst future developments may introduce larger built forms into the area, the current approach of breaking down the façade is considered to be a better approach in the short to medium term. However, the detailing which achieves this needs fine tuning. The depth of the pergola beams seem to be out of scale in terms of the capacity of such narrow beams to span the length of the balcony. Further consideration should be given to the detailing and structural integrity of these elements, including the provision of a structural engineer's certificate and more information on the materiality of these elements. In addition, the vertical elements on the eastern portion of the northern façade appear as a tacked-on afterthought to the design. It is recommended that further consideration be given to higher quality materials and architectural detailing to better integrate this design element into the façade.

The built form and scale of the development is discussed further in sections 4.1above and 4.9 below.

4.3 Principle 3: Density

Principle 3:

Good design achieves a high level of amenity for residents and each apartment, resulting in a density appropriate to the site and its context.

Appropriate densities are consistent with the area's existing or projected population. Appropriate densities can be sustained by existing or proposed infrastructure, public transport, access to jobs, community facilities and the environment.

Comment:

Achieving acceptable levels of amenity, communal areas, landscaping and sustainability may necessitate a reduction of the overall density of the development.

The balance between the number of residential units and commercial tenancies needs to be reconsidered. Commercial tenancies should be placed only where they have direct access to Windsor Street or the rear lane.

4.4 Principle 4: Sustainability

Principle 4:

Good design combines positive environmental, social and economic outcomes.

Good sustainable design includes use of natural cross ventilation and sunlight for the amenity and liveability of residents and passive thermal design for ventilation, heating and cooling reducing reliance on technology and operation costs. Other elements include recycling and reuse of materials and waste, use of sustainable materials and deep soil zones for groundwater recharge and vegetation.

Comment:

The Statement of Environmental Effects by Cityscape Planning + Projects states that sustainability has been a fundamental objective of the entire design. Furthermore, the Design Verification Statement specifies that the development promotes ecologically sustainable development through the following measures:

- Benefiting from orientation;
- Achieving cross-flow ventilation;
- Active and passive sun control systems;
- Working towards ensuring waste minimisation during construction and in terms of the life-span of the building, including in the recycling of materials and waste;
- Use of low energy saving devices;
- Compliance with BASIX.

While it is acknowledged that the residential units have been designed to benefit from the orientation of the site and do achieve adequate cross flow ventilation, some of the other ED measures have not been made clear, including the use of active sun control systems,

The BASIX report by Green Star Energy Solutions indicates compliance with the NSW Government's building sustainability requirements, however, there are a number of other considerations which should be addressed:

1. **Insulation and thermal comfort**:
   The roof appears to be a slender concrete slab. No details have been provided for insulation for the roof, walls or between floors. How will the heat from the roof be

dissipated? Provide details of how the building will handle mid-40°C temperatures which are common in Richmond in summer.
Are air conditioning units proposed? Consider incorporating ceiling fans into the design of main habitable areas (bedrooms and bathrooms) to reduce reliance on air-conditioning. Air conditioning units should not be placed on balconies. If air-conditioning is proposed, consideration should be given to an appropriate location of air-conditioning units and condensers which do not impact on the amenity of residents or adjoining neighbours in terms of aesthetics and noise.

2. **Water harvesting and recycling**:
   There does not appear to be any consideration of water harvesting and recycling. Consider options for water collection and re-use of rainwater throughout the building (e.g. toilets, external hoses, etc.)
3. **Outdoor drying areas:**
   There is no consideration of outdoor drying areas for laundry (other than on balconies). This will reduce the amenity of the development for residents and will also place a greater reliance on the use of clothes dryers which are energy intensive and unnecessary for a large portion of the year in Australia.
4. **Landscaping:**
   The small landscaped area proposed in the undercover driveway is insufficient for a site this size. There are no deep soil areas. The lack of landscaping reduces the amenity of the development (discussed further in section 4.5 below) and reduces the performance of the development against the sustainability criteria outlined in this design principle.

ESD principles should be incorporated into the design of all new buildings. Given consideration to the size of this site, the climatic conditions of Richmond and the readily available information and technologies relating to sustainable development, the proposal should consider additional sustainability measures.

4.5 Principle 5: Landscape

Principle 5:

Good design recognises that together landscape and buildings operate as an integrated and sustainable system, resulting in attractive developments with good amenity. A positive image and contextual fit of well designed developments is achieved by contributing to the landscape character of the streetscape and neighbourhood.

Good landscape design enhances the development's environmental performance by retaining positive natural features which contribute to the local context, co-ordinating water and soil management, solar access, micro-climate, tree canopy, habitat values and preserving green networks.

Good landscape design optimises useability, privacy and opportunities for social interaction, equitable access, respect for neighbours' amenity and provides for practical establishment and long term management.

Comment:

The current proposal provides minimal consideration of landscaping. With the exception of the narrow under-cover planter in the driveway off the rear lane, the proposal does not accommodate any landscaping. The lack of landscaping will significantly reduce the amenity of proposed apartments as well as the neighbouring properties.

The applicant should give consideration towards providing some landscaping in the car parking area such as trees, shrubs or green walls in order to provide some visual relief as well as shade and permeable surfaces to reduce the heat island effect created by hard paved surfaces.

At present, the proposed development is not consistent with the objectives of this design principle.

The proposed level of density of both retail and residential units as well as the development of the northern portion of the site in isolation contributes to the issues identified with this design, including the lack of communal space, amenity and landscaping.

4.6 Principle 6: Amenity

Principle 6:

Good design positively influences internal and external amenity for residents and neighbours. Achieving good amenity contributes to positive living environments and resident well being.

Good amenity combines appropriate room dimensions and shapes, access to sunlight, natural ventilation, outlook, visual and acoustic privacy, storage, indoor and outdoor space, efficient layouts and service areas and ease of access for all age groups and degrees of mobility.

Comment:

Internal Unit Layout, Dimensions and Shapes

The internal design of the units are reasonable in terms of creating access to natural light, cross flow ventilation and orientation of the living areas and bedrooms. However, the internal layout of the rooms could be adjusted in order to improve the amenity of the units in a number of ways:

1. The arrangement of the kitchen, living, dining and media areas is a bit awkward, leading to the creation of unnecessary small rooms (i.e. the media room) and the reduction of living space. The partition between the media room and living room could be reconsidered.
2. The location of the kitchen adjacent to the balcony reduces the availability of overhead kitchen storage spaces. Relocating the kitchen to the rear wall of the living/dining/kitchen area would allow for both the living and dining areas to face the balcony and would provide more solid wall areas for kitchen storage.
3. The details and resolution of the wet areas including the bathrooms, ensuites could be improved with better location of items. For example, corner truncated showers may be impractical and the overall layout of the bathrooms may be too cramped.

Access to Sunlight and Natural Ventilation

All of the units are oriented north-south with balconies to both sides. The majority of main habitable areas such as bedrooms kitchen, living, dining and are located on the southern and northern sides of the building with windows and balconies to the outside. Adequate artificial lighting and ventilation will need to be provided to the bathrooms, ensuites, laundries and any other partitioned areas such as the media rooms.

Orientation and Outlook

The 21.265m separation between the mixed use building on the northern portion of the site and the commercial building on the southern portion of the site is considered to be adequate to allow for an adequate outlook, access to natural light and breezes to all of the units.

With car parks located immediately to the north and south of the building, the use of an opaque glazing to the balconies on both sides may reduce the visual impact and glare and may improve the outlook and amenity of the units. This is also a privacy issue, particularly on the northern side of the building where balconies face the public car park. This is discussed further below in relation to visual and acoustic privacy.

Visual and Acoustic Privacy

The clear glazed balustrades to the balconies on the north and south sides of the building will reduce the amenity of the building in terms of privacy for the residents as well as the amenity of the neighbourhood in terms of the ongoing day-to-day appearance of the building which could be compromised by the clutter of domestic items and laundry on balconies.

To provide increased privacy for residents and the continued satisfactory appearance of the building, an opaque finish to the balcony balustrades is suggested. This could be achieved through the use of frosted glass rather than clear glass which would still enable the provision of natural light.

The proposal to extend the commercial building on the southern portion of the site with the creation of a new shop facing the private car park is not considered to be appropriate and will result in negative impacts on the visual and acoustic privacy of all of the units as the bedrooms overlook the internal car park.

It is noted that the subject site is located within close proximity to the RAAF Base Richmond and is within the ANEF 25 – 30 contour. In accordance with Clause 6.6 of the HLEP 2012, the consent authority must consider the acceptability of noise sensitive development situated within the vicinity of the RAAF Base Richmond. This is discussed further in section 3.2.4 above.

The site is located adjacent to an existing licensed premises. The proposal should demonstrate how the acoustic amenity of the residents can be protected when located in such close proximity to an existing licensed premises as well as a number of other retail premises.

Storage

The internal design of the units indicate some allowance for built-in robes to the bedrooms and additional storage in the living areas of some (not all) of the units. The size and dimensions of the rooms would appear to allow for the provision of adequate internal storage. However, further consideration should be provided for additional internal storage in both the kitchen and living areas.

The commercial and residential bin room needs to be reconsidered. It appears that the width of the opening to the bin room would not provide sufficient access for the commercial rubbish bins.

Communal Space

No communal open space has been provided for this building which reduces the amenity of the development for residents. This is discussed further in section 4.8 below.

Shelter

The 3D photomontage of the northern elevation indicates the presence of an awning over the footpaths in front of the shops. The ground floor plan, roof plan and cross sections do not show this detail. The construction of an awning may be supported, however, further information is required.

4.7 Principle 7: Safety

Principle 7:

Good design optimises safety and security within the development and the public domain. It provides for quality public and private spaces that are clearly defined and fit for the intended purpose. Opportunities to maximise passive surveillance of public and communal areas promote safety.

A positive relationship between public and private spaces is achieved through clearly defined secure access points and well lit and visible areas that are easily maintained and appropriate to the location and purpose.

Comment:

As noted above, the current proposal lacks any consideration of security which is of particular importance given consideration to the site's location adjacent to a licensed premises and public car parking area which may result in safety/security issues.

The security measures for the retail spaces fronting the public car park should be clarified. The design should incorporate sufficient detail to demonstrate how security for these retail tenancies should be achieved (e.g. glass type, lighting, etc.).

Adequate lighting should be provided to the undercover driveway and internal car park. Consider investigating options for lighting in these areas which will not impact on the amenity of the units at night.

The existing design provides an open pedestrian and vehicular access from the rear lane. This would enable any member of the public to walk through the site which may raise concerns in relation to safety as well as visual and acoustic privacy of the residents. As noted above, the creation of a new shop fronting the internal car park is not considered to be appropriate for this reason. In addition, consideration should be given to providing secure pedestrian and vehicular access to the site. This, together with the reduction of the footprint of the commercial building on the northern portion of the site would also allow for the creation of viable and usable communal facilities such as communal courtyard and washing lines.

4.8 Principle 8: Housing Diversity and Social Interaction

Principle 8:

Good design achieves a mix of apartment sizes, providing housing choice for different demographics, living needs and household budgets.

Well designed apartment developments respond to social context by providing housing and facilities to suit the existing and future social mix.

Good design involves practical and flexible features, including different types of communal spaces for a broad range of people and providing opportunities for social interaction among residents.

Comment:
The proposed four storey mixed use building comprises six two bedroom apartments with the same size and layout, therefore being targeted at a fairly narrow socioeconomic demographic. Given the limited availability of apartments in the Richmond area, the development will introduce a greater diversity of housing choice in the area and is therefore considered to be acceptable.

The current design does not provide for social interaction between residents through communal facilities or spaces. Consideration should be given towards creating communal spaces that will not adversely impact on the visual and acoustic privacy on the residents of the units or the surrounding properties. The removal of shop 3 and its associated parking may provide an opportunity for some outdoor communal facilities to be incorporated into the design of the development.

4.9 Principle 9: Aesthetics

Principle 9:

Good design achieves a built form that has good proportions and a balanced composition of elements, reflecting the internal layout and structure. Good design uses a variety of materials, colours and textures.

The visual appearance of a well designed apartment development responds to the existing or future local context, particularly desirable elements and repetitions of the streetscape.

Comment:
Further consideration should be given to geometry of window and door openings in order to make the pattern and proportions of openings more cohesive and to achieve a harmonious relationship between all window openings. In particular, the balcony doors, windows and aluminium framed doors to the ground floor retail spaces are all different widths. In addition, the detailing of the window elements could be fine-tuned so that they are recessed from the facades to provide more articulation between the solids and voids. This is of particular importance on the southern elevation.

The geometry of design elements on the south elevation does not respond to the established character of the area, particularly in regards to the timber look-alike cladding on the eastern side of the second floor. It is recommended that the design of this façade be amended with a more simplified approach and articulation be provided by other means and through the use of more appropriate materials.

The predominant materials of the town centre include brick or rendered/painted brick for walls and corrugated metal, terracotta tiles or slate for roofs. Further clarification of the choice of materials is required. The detailing shown in the photomontage contained within the schedule of exterior materials and finishes provides the appearance of a concrete look-alike cladding as a predominant wall surface finish with some timber look-alike elements which do not relate to the predominant use of materials in the area and are not supported.

The detailing should ensure that the appearance of the building is maintained in the long term. For example, the use of an appropriate capping at the top of external painted walls to assist in the prevention of the streaky appearance that results from the build-up of dirt. Furthermore, the selection of high-quality durable materials such as concrete or rendered brick rather than external wall cladding will assist in the maintenance of the aesthetic appeal of the building in the long term.

The proposed design treats the north elevation as the principal elevation and the south elevation as the rear. Due to the scale of the proposed development and the visual prominence of the site along Windsor Street and from Richmond Park, the design of the four-storey component of the building should also address the south elevation. The overall form, architectural detailing and materials utilised on this elevation should be simple and recessive.

4.10 **Summary**

In summary, the proposal outlines a scheme for the redevelopment of the site which in its current form, does not adequately address the design principles outlined above. Further consideration should be given of the overall scale, density, amenity, sustainability and aesthetic appearance of the development as well as the provision of landscaping.

Given consideration to these issues, some potential options for the design of the proposal may include:

1. Location of some parking facilities underground, however it is acknowledged that this may not be feasible due to the narrow nature of the site and the requirements for vehicle manoeuvring;
2. A reduction of density, including the removal of shop 3, as well as re-considering the built form and density across the entire site in order to achieve a built form and site layout that would provide a more acceptable level of amenity.

It is recommended that the applicant consider a range of different options for the redevelopment of the site which adequately addresses the above design principles. In addition, the extension of the commercial building on the southern portion of the site and creation of an additional shop accessed from the internal car park area is not supported.

While it is acknowledged that a maximum building height of 12m is permissible under the current HLEP 2012 controls, the necessity to concentrate the bulk of the development on the northern portion of the site has not been demonstrated, especially given consideration to the existing and proposed single storey height of the building on the southern portion of the site.

5 CONCLUSION

OCP Architects have undertaken a review of the proposed development at 197 Windsor Street, Richmond given consideration to the site constraints, the existing character and built form of the area, the statutory controls and the design principles outlined in Schedule 1 of SEPP 65 – Design Quality of Residential Apartment Development.

The assessment undertaken in this report has highlighted a range of fundamental concerns, including:

- The concentration of the bulk of the development on the northern portion of the site;
- The creation of a new shop (shop 3) which is accessed from the internal car park area;
- The lack of landscaping and communal areas;
- The selection of materials, in particular, the timber look-alike cladding and the use of clear glazing to the balcony balustrades;
- The acoustic impacts resulting in the site's location in close proximity to the RAAF base Richmond;
- The thermal comfort of the units and the ability of the building to handle extremely high temperatures in summer which commonly exceed 40^0C in Richmond;
- The general lack of sustainability measures incorporated into the design of the building;
- The lack of consideration of any security measures, especially given the location of the site in proximity to an existing licensed premises and a public car park;
- Inadequate provision of parking for the total number of residential units and retail spaces which are proposed on the site;
- The architectural detailing of the northern and southern elevations, including the geometry of window and door openings and frames, and other architectural features;
- The long term visual appearance of the building.

The proposed development in its current form is not recommended for approval.