

DESIGN+PLACE SEPP EIE RESPONSE

Date	28 th April 2021
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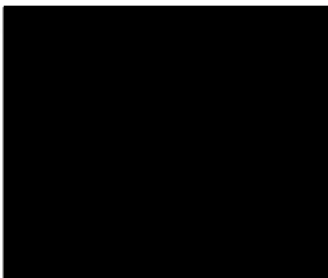
This submission is lodged on behalf of Group GSA Pty Ltd, a multi-disciplinary design practice. We have Urban Designers, Architects and Landscape Architects as part of our NSW team, and make this submission based upon our understanding and experience in our various disciplines, applied across all typologies and scales, and from our depth of experience in all forms of Living Environments projects (main market, affordable, social, Co-Living pilots, Boarding houses, mixed use, residential towers (build to sell), student accommodation, seniors living, aged care and master planned communities / medium density.

We applaud and support the intention of the Design and Place SEPP, its reinforcement of the Connecting with Country document, and the broader suite of documents that the GANSW have published regarding principles led design. Our commentary and recommendations over the following pages pertain primarily to the detailed changes of the ADG and the proposed UDG.

We support the simplification of the ADG as a principle. Written as a guide, Councils, Panels and Land and Environment Court apply it as rule, borne out by case law and the very detailed sub documents pertaining to cross ventilation and the application of the ADG by Sydney City Council. In practice, it has gone from transforming the quality of residential development, to becoming an impediment to development in many aspects, due to this unilateral use as rule. To put even more onerous requirements in some key areas will make development and design both incredibly prescriptive and difficult to achieve.

We have summarised the key points of our response to the specifics of the ADG and UDG on the following pages, and look forward to the next exhibited material being released with a further opportunity for more in depth Industry feedback.

Yours Sincerely,



Lisa-Maree Carrigan

Director, ARB 7568

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ADG : POTENTIAL RESPONSE CONTENT (TO PROPOSED DESIGN CRITERIA)

TABLE A5

2_LANDSCAPE + GREENING

- Min 14%-18% on sites less than 3,000sqm as criteria is more than double the current
- 21%-25% on sites over 3,000sqm is more than 3 times the current
- **RECOMMENDATION:** maintain the current criteria, and allow for this area of landscaping to be amalgamated with ADG Part 4P (pg 116-117) – planting on structures, which as a full proposition for a site can provide small, medium and large tree planting. This could also be linked to tree canopy % targets.

3_BUILDING FORM

- Max. GFA of 700sqm over 9 storeys per plate @ 85% efficiency = 595sqm nett plates or approx. 7 units (@85sqm/unit gross inc common area)
- Max 8 units per floor above 9 storeys per core in midrise i.e.. below 20 storeys is cost prohibitive particularly in the 'slab block / perimeter block' configurations of up to 15 storeys approx., where street edge and perimeter wall are the preferred outcome.
- **RECOMMENDATION:** a) have an intermediary scale of floorplate for < 15 or 20 storeys, suggest 900sqm GFA and then 750sqm above. b) use a graded scale like Parramatta Council if perimeter blocks/slab block typology is undesirable ,20 storeys, 20-40 storeys,40 storeys +

4_BUILDING SEPARATION

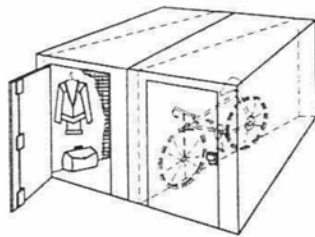
- 30m for 25+storeys an additional 6m between buildings
- **RECOMMENDATION:** maintain existing criteria, which is sufficient when compounded with floor plate sizes, deep soil, solar access etc. Express guidance to avoid parallel towers / minimise form overlapping to maximise residential privacy and urban form legibility.

5_MIXED USE DEVELOPMENT + STREET ACTIVATION

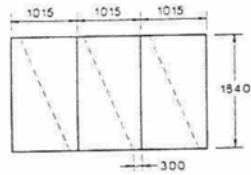
- 40% of ground floor space for non-resi use in R3 + R4 zoning is a blunt mechanism which doesn't allow for; site location and compatibility with adjacent uses, site configuration and proportion of street address, position and number of buildings on site.
- **RECOMMENDATION:** delete the metric and have guidance regarding encouraging non-residential uses at ground floor when facing a street where mixed use is desired, and to be consistent with Council DCP

9_BICYCLE PARKING + MOBILITY STORAGE

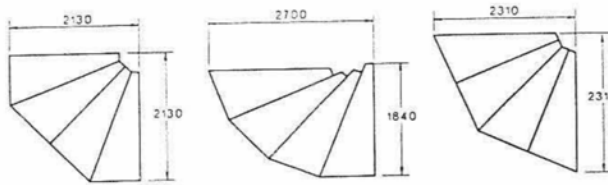
- Bikes: 1 x secure space/1bed,2 x secure spaces/2 bed, 3 x secure spaces/3 bed: presumes 100% bike usage which is a substantial spatial requirement and highly unlikely in a city fraught with steep topography
- **RECOMMENDATION:** maintain current rates but support a centralised bike storage in addition to cater for additional bike uptake / development (perhaps a ratio per dwelling numbers)



(a) Bicycle lockers



(b) Typical double-sided layouts



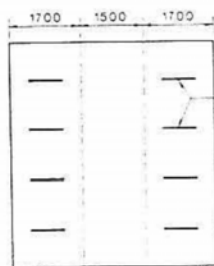
(c) Typical quadrant or fan layouts

DIMENSIONS IN MILLIMETRES

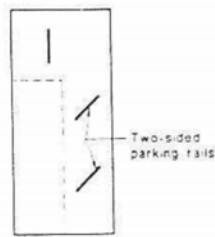
FIGURE B1 TYPICAL CLASS 1 PARKING FACILITIES WITH BICYCLE LOCKERS

DIMENSIONS IN MILLIMETRES

FIGURE B2 TYPICAL CLASS 2 PARKING FACILITIES



(a) Double parking bay (4900 x 5400)
sixteen bicycles



(b) Single bay (2400 x 5400)
six bicycles

NOTES

1. A perimeter barrier should be provided to protect bicycles from damage by moving cars.
2. Signposting or physical devices may be required to discourage or prevent access to the area by motor cycles.

DIMENSIONS IN MILLIMETRES

TABLE A6

1_SOLAR ACCESS

- An increase of range of hours and simplified calculations (both very supported)
- Maximisation of orientation to 15 degrees of north/ minimisation of eastern and western single aspect is challenging and unrealistic when laying out efficient/affordable residential buildings, and doesn't allow for site orientation etc.
- No glazing for 1m from floor level impacts on views, amenity etc, and is overly prescriptive when environmental performance should be the criteria.
- **RECOMMENDATION:** a) extend hours 8am – 4pm for solar access, and solar 2 hrs to pos and living
b) maintain current solar requirements and objectives of maximising preferred orientation (the max 15% no solar is a good current metric)

2_NATURAL VENTILATION

- 70% cross ventilation: when considered with the now accepted view ie no re-entrant spaces/slots/rebates, the current 60% is hard enough to achieve
- Being counted across all storeys, not below L9; discredits the entire basis that 100% natural vent occurs above L9 due to smaller plates and wind testing research.
- **RECOMMENDATION:** keep at 60% and below L9

5_APARTMENT LAYOUT

- 20% of 2B+ to be family units with min 12sqm bedrooms; presuming nett of robe as useable space, adds 6sqm / unit approx. which further hinders affordability (adds \$35k-\$60k to purchase cost approx. on average)
- **RECOMMENDATION:** promote flexible spaces / additional study areas without being prescriptive

8_STORAGE

- Overall storage increases, with the min amount in the unit is a double-edged issue; min in unit is fine but adding to the basement impacts on affordability.
- **RECOMMENDATION:** maintain current rates but add additional lockable storage areas that are on a per development basis relative to units (optional additional lockable areas for rent)

10_ACOUSTIC SEPARATION

- 1 x acoustically separable area from the living space / 1or 2 bed, 2 x 3+beds: good objective intent, as long as not requiring windows or needs a change to ADG study definitions, excessive for 3beds+
- **RECOMMENDATION:** require 1/ unit, without needing daylight or primary façade frontage to allow for options not within the bedroom

TABLE A7

1_COMMUNAL OPEN SPACE

- Unspecified metric relating to occupancy (presumably density or simply unit #s) could be a metric, however focus should be on diversity of spaces to provide areas on sun, shade, BBQ, quiet respite etc.
- Covered communal space of min 250sqm for resi developments over 1,000sqm is an overbearing metric, where requiring a multifunctional covered space on a sliding scale is appropriate. Why accessible from the street? Why host community events in a private development (liability etc)
- **RECOMMENDATION:** require a communal space that encourages connection with external communal open space, with perhaps a < 50 units (50sqm), 50-200 units (100sqm), 200+units (200sqm+) criteria. Also encourage the creation of music rooms/alternative scale communal spaces which could be viewed as part of the total communal space offering (balanced with communal open space)

3_LIFT REQUIREMENTS

- Clear space in front of the lift to be 2.5m: nice to have which penalises useable GFA on a plate.
- **RECOMMENDATION:** encourage larger spaces opposite a lift but exclude any GFA in lift lobby beyond 1.8m from the GFA calculation (encourage useability/generosity without penalising twice – cost + GFA)

4_BUILDING ACCESS, COMMON CIRCULATION + SPACES

- LHA and 'visitable' circulation is the norm and supportable, however the penalisation of generous circulation at the expense of GFA is the key issue.
- **RECOMMENDATION:** exclude any GFA in corridors wider than 1250mm

DESIGN AND PLACES SEPP RESPONSE

B1 THE NEED FOR AN URBAN DESIGN GUIDE

GENERAL COMMENTS:

- In principle, we are supportive of the need for a comprehensive design guide for precinct planning and larger scale development proposals.
- Urban outcomes in Sydney currently are of variable quality, however our concern rests with mandating universal over place-based controls.
- The role of the development control plan in relation to the future UDG. While guides can deal broadly with a typology and universal amenity aspects, DCP's will need to indicate what elements of the guides are appropriate to a specific context and character. There needs to be clear delineation in how these will work together to achieve best practice urban design.

B1.3 DEVELOPING GUIDANCE

- The need to consider, and methods for measuring gross density dwelling; this is achievable through planning controls.
- **RECOMMENDATION:** more specificity around how these will relate to LEP's and DCPs

B1.5 DELIVERING VALUE

- Guidance on street and lot sizes can more efficiently allocate land to housing and reduce conversion of productive arable land.
- **RECOMMENDATION:** agree in principle with the need for these to be articulated in controls, however more specificity is needed that relates to the immediate site and its context in order to achieve place based urban design.

B2.2 CONSOLIDATING DESIGN GUIDANCE

- Supplement existing precinct and master planning under geographic SEPPS by providing holistic design considerations for all larger scale developments.
- Facilitate local strategic planning (including the development of local environmental plans and local strategic planning statements)
- **RECOMMENDATIONS:** The guide will need to articulate an approach to large precinct master plans rather than a universal guide that rolls all geographic SEPPS into one.

B3.4 DESIGN CONSIDERATIONS

- Part 2: Structure – the guide intends to foster inclusionary zoning and mixed-use communities through setting a maximum percentage of 'single use zones' (such as low density residential) as well as guiding the activation of ground floor uses in medium density and high density residential zones to inform site planning, such as non residential ground floor zones in new apartment development.
- Part 3: Grain – guidance is proposed to introduce requirements for lot dimensions (depth and width), subject to the typology intended for the site as well as the street interfaces and street wall height.

B3.5 INTENDED EFFECTS

- Limiting the amount of single use residential zones within the new precincts to less than 50 per cent, and the minimum non residential ground floor space required in R3 and R4 zones and centres.
- **RECOMMENDATION:** applying universal design controls as a guide will not facilitate place based design for practitioners. While we agree in principle with inclusionary zoning, not all parts of Sydney are appropriate for mixed use ground floors. There are a number of high and medium density areas currently that are not tenanted, and which has been exacerbated by COVID and do not have the visual surveillance or amenity that the proposed control is advocating.