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Revision	Date	Description	By	Chk	App
01	17/11/22	Draft Peer Review	WW	WW	DN
02	06/12/22	Final Report	WW / DN	WW	DN

## 1.0 Introduction

Conybeare Morrison International (CM<sup>+</sup>) was engaged by Inner West Council (IW Council) to conduct an independent peer review of the new Planning Proposal for 67-75 Lords Road, Leichhardt, dated August 2022 (the 2022 Planning Proposal). The review assesses the 2022 Planning Proposal against the key documents including Parramatta Road Corridor Implementation Plan 2016-2023, Parramatta Road Corridor Urban Transformation Strategy, Parramatta Road Corridor Urban Transformation Planning and Design Guidelines and the previous Lords Road Peer Review Report by CM<sup>+</sup> dated January 2019. The review focusses on the urban design aspects of the proposal and following key topics:

- Appropriate land uses
- PRCUTS compliance (a succinct compliance table has been provided in Appendix A)
- Living amenity / State Environmental Planning Policy No. 65 Design Quality of Residential Apartment Development (SEPP 65) compliance
- Davies Lane streetscape improvement
- Access and circulation
- Function of the central open space
- Likely impacts on surrounding residents and transitions

The site is currently zoned IN2 Light Industrial with no height control and a permissible Floor Space Ratio (FSR) of 1:1 under Inner West LEP 2022. The 2022 Planning Proposal seeks to capture the zoning, height and FSR nominated in the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) by former State Government's UrbanGrowth NSW as well as Council's aspirations to retain employment uses on the site, including:

- Change the IN2 Light Industrial Zone to R3 Medium Density Zone
- Introduce a maximum height of 30m and
- Introduce a maximum FSR of 2.4:1
- Maintain flexibility of ground floor uses for employment

The Peer Review has been undertaken on the 2022 Planning Proposal and supporting documentation as submitted to Council for assessment. Key issues that may result in the requirement for a fundamental redesign have not been addressed in this Peer Review and may require a redesign of the subject site, including:

- The subject site is flood affected as noted in Appendix G Flood Risk and Impact Assessment. In accordance with Leichhardt Development Control Plan 2013, Section E1.2 Water Management and Section E1.3 Hazard Management sets out the requirements for development of flood control lots. The building footprints of Buildings A and B are located within 100 year ARI Flow Path and Building A is located within the 100 year ARI High Hazard. Any proposed building footprint must be supported by Pre and Post development flood modelling. The outcome of these studies may trigger a redesign of the proposed development including restrictions on acceptable types of accommodation.

- PRCUTS Parramatta Road Corridor Planning and Design Guidelines pages 214-219 sets out the Recommended Planning Controls for Taverners Hill Precinct. An RE1 Public Recreation zone along the light rail embankment is identified in the recommended land use map; however, the map does not nominate the land parcels or width of this zone. Upon seeking clarification with IW Council, Council believes that these maps identify the following for the subject sites:

67 Lords Road	75 Lords Road
R3 Medium Density Residential	RE1 Public Recreation
Maximum HOB 30m	Not stated
FSR 2.4:1	Not stated

Further clarification of this issue is needed to ascertain an appropriate allowable FSR and GFA for the scheme.

- Provision for maintaining flexibility of ground floor uses including access, service, impacts and spatial configuration of these spaces needs to be adequately addresses.

## 2.0 Overview

As a part of the 2022 Planning Proposal, an Urban Design Scheme is included in the Urban Design Report prepared by SJB dated July 2022. An Urban Design Scheme has also been provided for the site to demonstrate an outcome that responds to the updated zoning parameters. This Urban Design Scheme also forms the basis for setting the proposed Draft DCP controls. In summary, the Urban Design Scheme contains the followings:

- Five distinct built forms ranging between two storeys and eight storeys
- Two eight-storey buildings to the west of the site along the Light Rail embankment
- Two six-storey buildings (four-storey streetwall plus two recessed storeys atop) to the east of the site along Davies Lane
- One two-storey building along the northern edge of the site adjacent to Lambert Park
- A centralised publicly accessible open space along Lords Road
- A north-south secondary GreenWay link to the east of the Light Rail embankment within the 6m western site boundary setback area
- A 9m east-west public through site link connecting Davies Lane to the north-south secondary GreenWay link
- A 6m setback along western, northern and eastern boundary and
- A 6m setback along Lords Road over the eastern half of the site.

Compared with the 2018 Planning Proposal, the 2022 Planning Proposal introduces the following key positive changes:

- Height and FSR alignment with PRCUTS

- Increased street setback along Davies Lane
- Removal of Davies Lane vehicular access
- Increased setback to Lords Road and Davies Lane

Additional information related to SEPP 65 and potential visual impacts are also provided for further assessment.

Some urban design related issues have been identified covering:

- Resolution of the potential zoning updates to comply with PRCUTS intentions
- Built form
- Access + street address
- Public + private open spaces
- Land use + amenity
- Building layout + flooding
- Misaligned and inadequate information also present in the 2022 Planning Proposal

This peer review summaries the above-mentioned issues and provides comments and recommendations with regard to the merit of the proposal in consideration of Council's requirements for R3 Zoning, aspirations to maintain employment potential on the site and PRCUTS Planning and Design Guidelines.

### 3.0 Urban Design Peer Review Limitation

This review is limited to the information given and assumes that the numerical data provided by the Proponent is accurate.

This report should also be read in conjunction with other relevant reports / assessment comments provided by the consent authority. The focus of this review is the urban design aspects of the proposal. Detailed issues arising from flooding constraints, employment strategies, arboriculture, etc. may need to be addressed by others. These may trigger redesign of the scheme.

### 4.0 Review of Site + Proponent's Documents

In conducting the peer review, CM<sup>+</sup> has reviewed the following information:

- Eastern City District Plan by Greater Sydney Commission
- Parramatta Road Corridor Implementation Plan 2016-2023
- Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) 2016
- Parramatta Road Corridor Urban Transformation Planning and Design Guidelines 2016
- Parramatta Road Corridor Urban Transformation Fine Grain Study 2016
- Parramatta Road Corridor Urban Transformation Strategy Implementation Update 2021
- Inner West Local Environmental Plan 2022 (IWLEP 2013)

- Leichhardt Development Control Plan 2013 (LDCP 2013)
- SEPP 65 and the Apartment Design Guide (ADG)
- Our Inner West 2036 – Local Strategic Planning Statement
- GreenWay Master Plan 2018
- Inner West LEP Phase 2A Draft Planning Proposal (2022)
- Inner West LEP Phase 2A Draft DCP Amendments (2022)
- Parramatta Road Corridor Urban Design Peer Review Taverners Hill Precinct by Architectus dated June 2021
- Lords Road Peer Review Report by CM<sup>+</sup> dated January 2019
- Recent Development Applications (DAs) adjacent to the site, including 8 and 12 Davies Street, Leichhardt

The following 2022 Planning Proposal documents are also reviewed:

- 65-75 Lords Road, Leichhardt Planning Proposal by FPD dated August 2022
- Urban Design Report prepared by SJB dated July 2022
- Aborigicultural Assessment Report by elke Arborist dated July 2022
- Draft Site-Specific Development Control Plan by FPD dated August 2022 (the Draft DCP)
- Flood Risk and Impact Assessment by Tooker + Associates, dated June 2022
- Statement of Heritage Impact by Architelle dated June 2022

## 5.0 Site + Current Context

The subject site is bounded by Lords Road to the south, Davies Lane to its east, and Lambert Park to the north. A Local Heritage listed house at 20-22 Foster Street, Leichhardt is located at the southeast corner of Lambert Park lot (legally described as Lot 658 in DP 729265) under the IWLEP 2022. The Inner West Light Rail is elevated on an embankment which runs along the west of the site. The Light Rail sits within the GreenWay corridor; a pedestrian and bicycle pathway, and environmental and community connector which links Sydney's bays, Hawthorne Canal, parks and residential neighbourhoods.



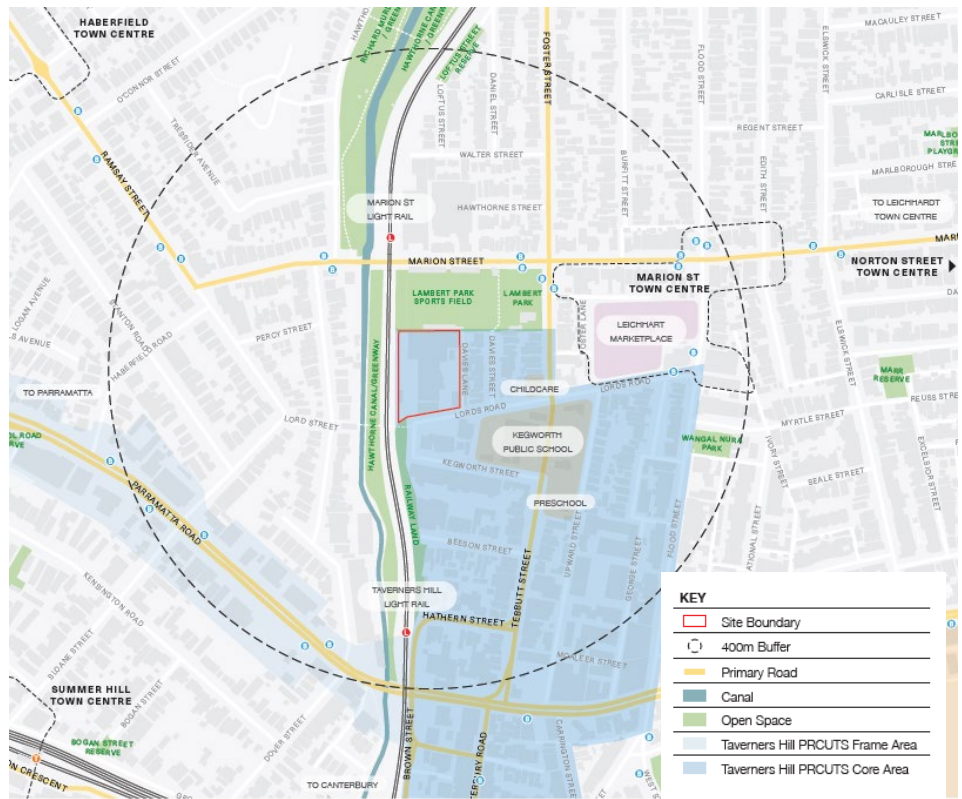


Figure 1 The Site in Its Current Context (Source: SJB)



Figure 2 The Existing Site Conditions (Clockwise: Kegworth Street View; Lords Road View towards West; Lords Road View towards East; Davies Lane View towards South; Source: Google)

The site falls from Davies Lane/Lords Road intersection at the east boundary, to the Light Rail embankment on the west boundary by about 3m. There is also a 2m fall from Lords Road

towards Lambert Park along Davies Lane. Marion Light Rail Station is within a walkable distance from the site (about 500m walking distance and 200m direct distance). The site is also within close proximity of Lambert Park and playground, the heritage listed Kegworth Public School, and Leichhardt Marketplace shopping centre.

Generally low-scale single-storey detached houses form the site's current context (along with Lambert Park to the north, Light Rail line and the Greenway corridor to the west). Although there are a couple of recent DAs along Davies Street, the developments are of low scale with up to two-storey detached buildings.

### 6.0 Future Context

PRCUTS identifies the following changes to the site's surroundings: proposing an up-zoning in residential use, establishing a building height control (currently there is no height control) and increasing the density for properties to the east and south – from the current R1 General Residential, to R3 Medium Density Residential; establishing a height of building of 17m (up to 5 storeys), and an increase in density from the current 0.5 (or 0.8):1 FSR to an FSR of 1.4:1.

Future development within the Taverners Hill Precinct along the PRCUTS corridor to the east and south of the site will be of a larger scale than existing, as the current smaller sites, upon redevelopment, will generally be consolidated into larger parcels, and development will be characterised by up to five storey built form with upper level setbacks, however generally reduced setbacks to street frontages and the laneway. PRCUTS proposes new dwellings within the new Medium Density zone to the east and south of the site to retain a fine grain, and townhouses and terraces are indicated as appropriate building types.

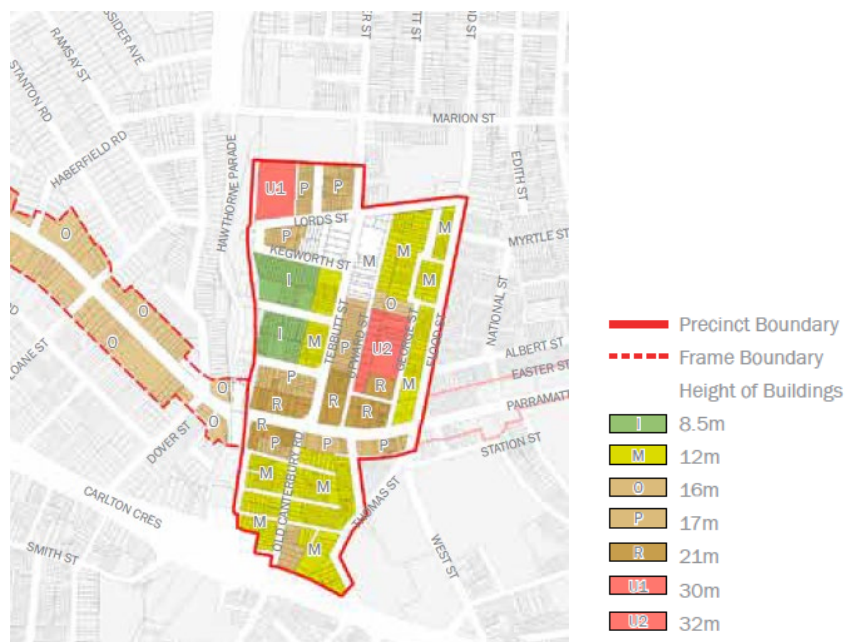


Figure 3 PRCUTS Recommended Building Height Controls (Source: PRCUTS)



In the short term it will be important for development on the subject site to transition in height and overall built form to the current low-scaled adjoining areas, and in the long term to future medium scale developments.

## 7.0 PRCUTS Alignment Review

### 7.1 Zoning

The 2022 Planning Proposal proposes to change the current IN2 Light Industrial zoning across both lots to R3 Medium Density Residential zone.

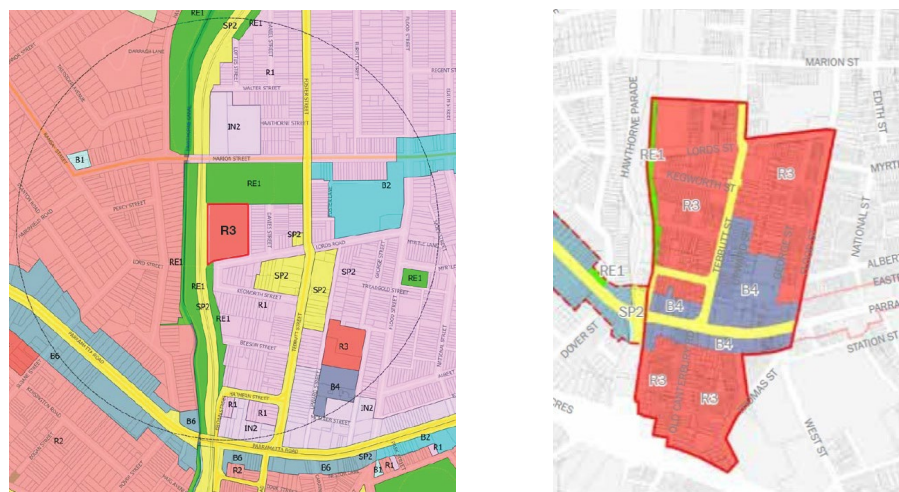


Figure 4 The Proposed Zoning Map (left) and the PRCUTS Recommended Land Use Map (right)

As noted above PRCUTS identifies a portion of the site as an RE1 Public Recreation zone along the Light Rail embankment. This is to provide a continuous public through link, through public space, along the eastern side of the Light Rail. The 2022 Planning Proposal includes a 6m setback along its western boundary allowing for a through site link, but does not identify any portion of the site as an RE1 zone. As the proponent seeks to rezone the site consistent with PRCUTS, it should demonstrate how the RE1 zone is incorporated into the scheme. The proposal does provide a public link along its western edge, it is not clear that this fulfills the intention of PRCUTS to secure a permanent public way at this location.

#### Recommendation

*It is recommended that the proponent clarify the intentions of future zoning configuration of the site and how the future RE1 zone is to be incorporated into the scheme.*

### 7.2 Building Height

The proposed built forms take into account the previous recommendations in regard to building height by introducing up to eight-storey buildings within the site.

The proposed sections illustrate that all parts of the proposed buildings, including lift overruns are also within the 30m height limit. This height generally aligns with the existing tree canopies along the light rail which assists with screening the proposed tall buildings when viewed from the Heritage Conservation Area to the west and northwest.

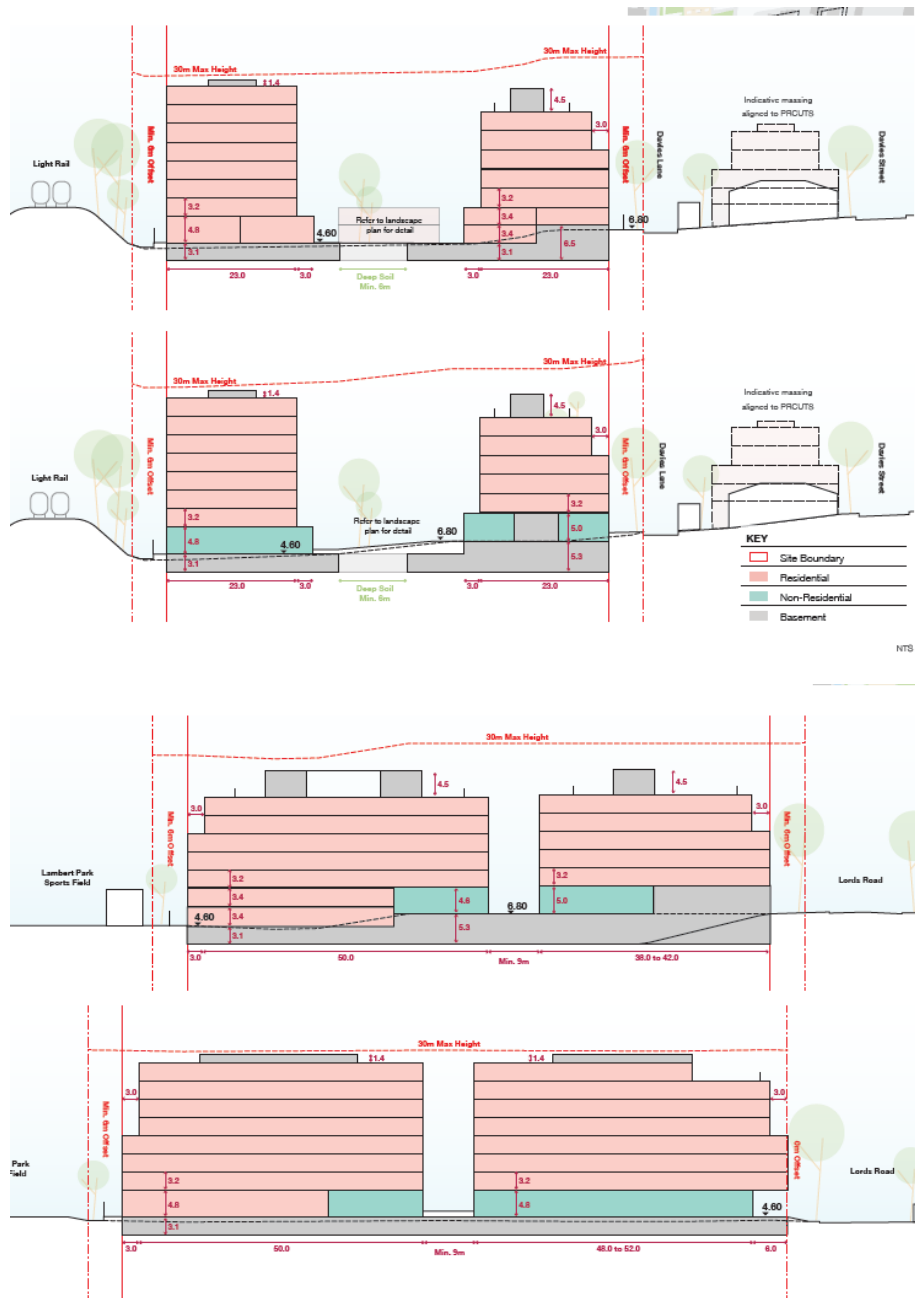


Figure 5 The Proposed Sections Showing the Proposed Height (Source: SJB)

### 7.3 Density

A change in density from the current FSR of 1:1 to FSR 2.4:1 is proposed, which is in accordance with the PRCUTS recommended FSR for the R3 zone. The masterplan in the Proponent’s Urban Design Report illustrates that the proposed built form envelopes can achieve an FSR of 2.4:1. Achieving the maximum FSR is subject to compliance with built form controls including street and upper level setbacks and building separations. As noted above, clarification of the final resolution of the rezoned site may also affect how the allowable GFA is calculated. Refer to the following sections of this peer review for the relevant comments and recommendations.

**Recommendation**

*It is recommended that the Proponent conduct further built form and yield testing based on full compliance with proposed built form controls and resolution of the site rezoning. This is to confirm implications of the proposed DCP controls, compliance with the intentions of PRCUTS, and demonstrate that appropriate amenity is maintained for future residents and surrounding areas.*

**8.0 Built Form**

The 2022 Planning Proposal will result in an R3 Medium Density zone in a R1 Low Density Residential zone in the short to medium term. Considering the site’s proximity to public transport, shopping centre as well as open space and recreational amenity, the site has the potential to accommodate a higher density as suggested in PRCUTS. However, it is important for development on the site to provide built form and height transition to the adjoining areas.

The 2022 Planning Proposal introduces two six-storey buildings along Davies Lane and steps up to eight-storey along the western boundary. Five distinct building envelopes are proposed above ground level; however are connected in the basement level(s).

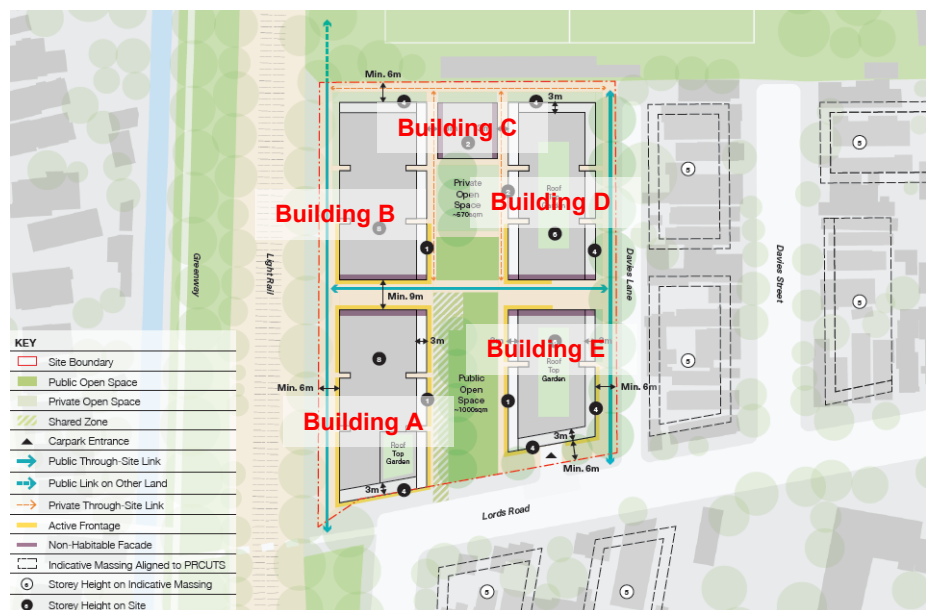


Figure 6 The 2022 Planning Proposal Concept Plan (Source: SJB)

PRCUTS envisions five-storey buildings to the east of the site. The 2022 Planning Proposal’s four-storey streetwall height along Davies Lane therefore is compatible to the PRCUTS built form strategy. The proposed continuous 6m street setback and with additional upper level recessed from the four-storey streetwall further mitigate the bulk and scale along Davies Lane and is supported. However, the streetwall height facing the Light Rail embankment does not comply with the maximum of 18m (roughly 5 residential storeys) streetwall height recommended in the PRCUTS. The 8-storey built forms without secondary setbacks on the upper levels facing the western boundary do not comply.

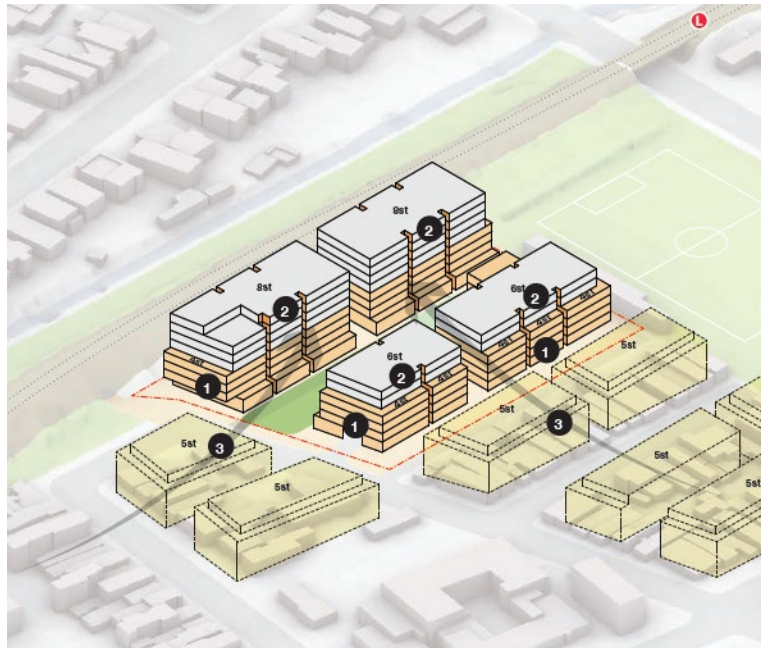


Figure 7 The Proposal within the Potential Future Context (Source: SJB)

The proposed 6m setback to Davies Lane aligns with CM<sup>+</sup> previous recommendation of providing a wider setback and is supported. However, additional information is also requested for further assessment. Refer to Section 13 of this report. The proposed removal of all trees along the Davies Lane frontage and the Lords Road frontage within the site (Arboricultural Assessment dated 4 July 2022) does not align with CM<sup>+</sup> previous recommendation of tree retention. Refer to Section 17 of this report.

A 6m setback has partially been provided along Lords Road. This extends along the eastern half of this frontage and locates the façade of Building E. Building A, however, does not continue this setback. At the western edge of the site, at Building A, the setback becomes more critical as this area is adjacent to the Hawthorn Pedestrian Tunnel providing access to the GreenWay. Building A has 6m arcade at this location with upper level floors located over this zone. This arrangement eliminates the opportunity for tree planting at this location and will contribute to the building bulk when viewed from Kegworth Street.

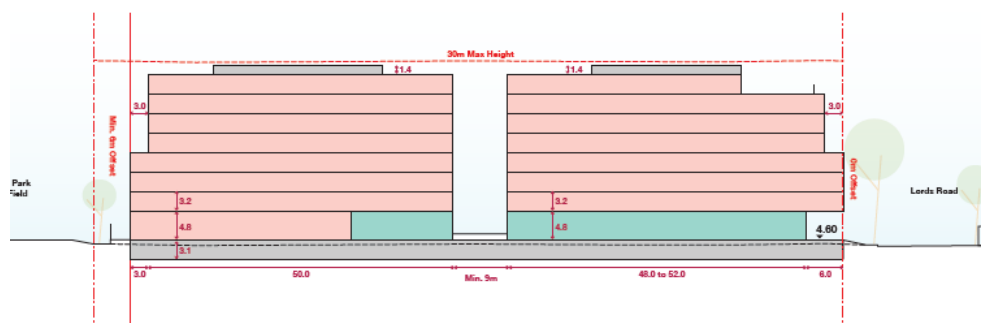


Figure 8 Lords Road Section Showing the Proposed Setback Along Lords Road (Source: SJB)

### **Recommendation**

*A continuous 6m street setback along Lords Road is recommended to provide a continuous streetscape, enable tree planting and potentially reduce visual impact. This setback should also be free from extrusions from any parts of the proposed buildings. The Proponent should also refer to PRCUTS streetwall recommendation.*

## **9.0 Access and Street Address**

### **9.1 Residential Address Points**

The proposed pedestrian circulation around the central open space is to be strengthened. A clear and legible pedestrian circulation, that links all the residential lobbies, is needed to improve the proposal's sense of address, in particular, for the buildings deep inside the block. The design in its current form presents a rather convoluted pedestrian access system, which is interfered with the shared path along Building A, parking etc.

Residential entries for Buildings A, B and D rely on the proposed façade indentations, which result in long and narrow corridors leading to recessed lift cores. This design outcome is not desired. More generous residential lobby areas need to be provided accommodating seating and gathering places. The Building E ground level reference scheme presents a better lobby design compared with the rest. This will also assist with wayfinding and contribute positively to the sense of address within the proposed development.

### **Recommendation**

*It is recommended that the Draft DCP ensures that a legible and unencumbered pedestrian circulation 'street' connecting all the residential lobbies can be achieved in the DA stage. The Draft DCP should also promote generous residential lobby areas accommodating seating and incidental meeting opportunities and providing robust entrance identities.*

Direct ground level access to the proposed residential units is proposed based on the Urban Design Report. However, the Draft DCP does not reflect this design. It is critical to have direct street level access to improve activation and public domain passive surveillance.

### **Recommendation**

*The Draft DCP Access, Movement and Parking section should include a provision ensuring direct ground level access is provided.*

It is also noted that direct access to Building C from the basement is missing. The Proponent is to clarify how the future residents access the proposed townhouses when parked in the basement. Based on the reference scheme, Building C can only be accessed from the basement via basement ramp or other residential lobbies. This is not supported.



**Recommendation**

*Further clarification from the Proponent is needed. The Draft DCP should ensure direct access from the basement to Building C is provided.*

It is also unclear whether the design considers emergency vehicle access to buildings at back fronting Lambert Park (Buildings B and C). The proposed clearance between Buildings B/D and Building C/Private Open Space is only 3m. An increased clearance is suggested to accommodate potential emergency access. This will also improve the relationship between Buildings B, C and D. Refer to Section 11 of this report for comments and recommendation regarding separation.

**Recommendation**

*An increased separation is desired from both emergency access and built form outcome perspectives. The Proponent should consider this.*

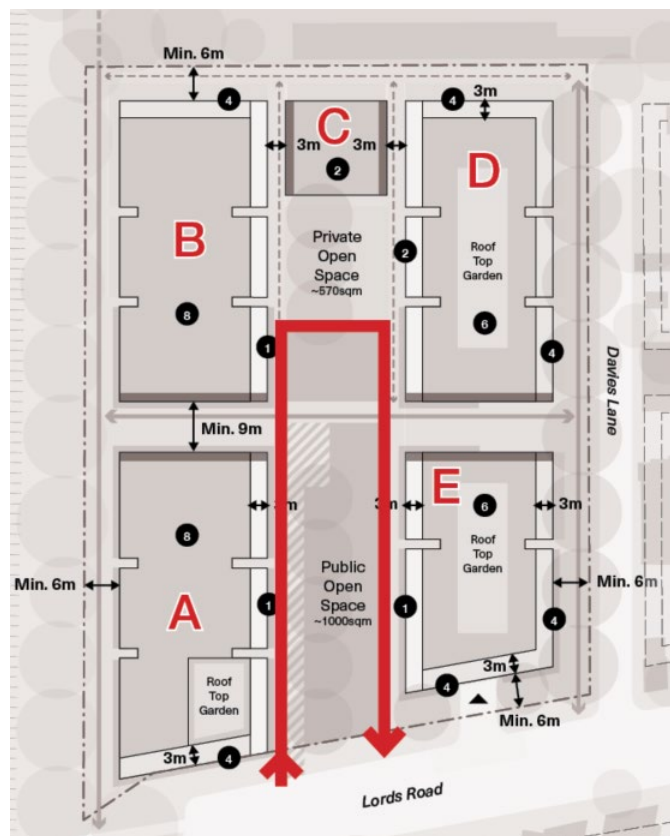


Figure 9 A Strong Pedestrian Circulation (Source of SJB)

## 9.2 Shared Path

The purpose of the shared path is unclear. It does not appear to provide adequate parking for the non-residential uses and, if intended as a service zone, will be incompatible with pedestrian usage.

### Recommendation

*The Proponent is to clarify the function of this shared path and ensure a clear and safe pedestrian walking environment is provided.*

## 10.0 Public and Private Open Spaces

The proposal includes a 6m wide setback along both the western and eastern boundaries, providing north-south public through site links. An east-west pedestrian link through the centre of the site is also provided.

A 'Publicly Accessible Open Space' is proposed at the centre of the development; however it is divided by the proposed east-west pedestrian link. The northern part (No.2 in Figure 10) directly abuts the proposed ground level private communal open space. It is critical to separate public open space from private communal areas to ensure its adequate amenity and privacy. Both the landscape plan and the Draft DCP should provide adequate design provisions to ensure this can be achieved in the DA Stage.

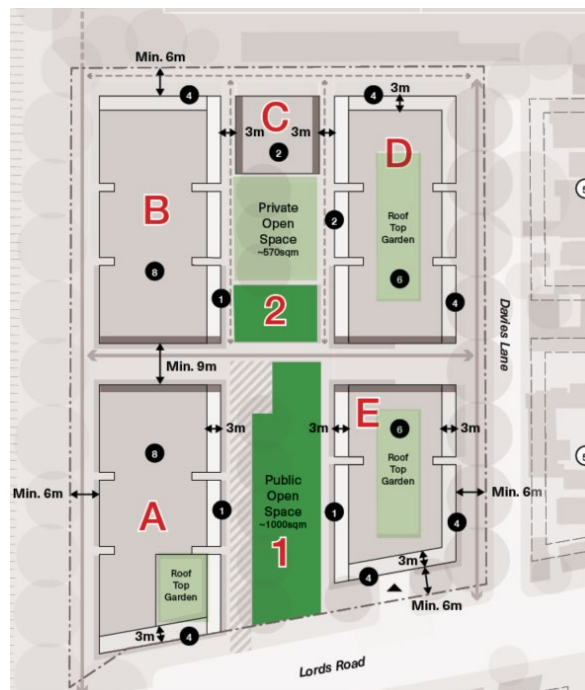


Figure 10 Public and Private Open Spaces (Source: SJB)

The landscape plans indicate that the east-west pedestrian link will provide universal access across the site and increase the site's permeability to the benefit of the community and is supported.

The place making strategy along this link, however, is unclear. This link is encumbered by the shared path, parking spaces, and a row of north-south trees close to Building E. The proposed DCP identifies active frontages along this link while the landscape plan illustrates a series of planters along the building façades. As illustrated, the design does not comply with the proposed DCP.

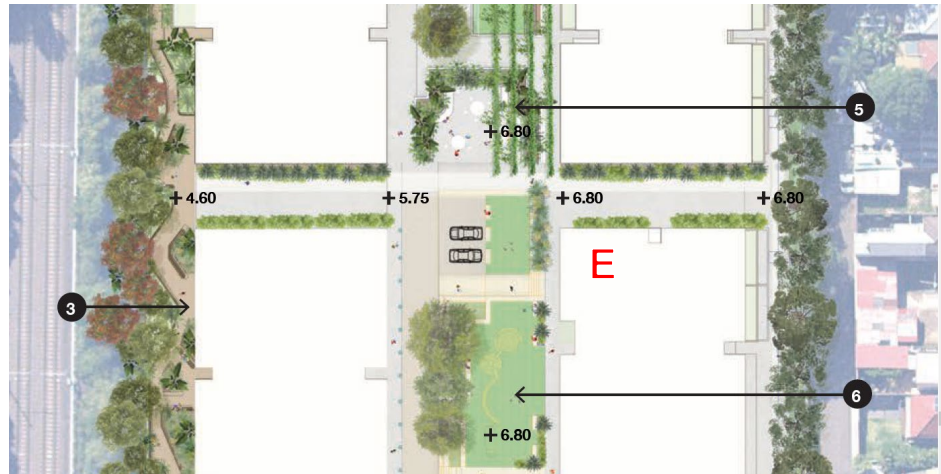


Figure 11 East-West Link Landscape Plan (Courtesy of SJB)

**Recommendation**

The proposed east-west through site link should have a more straightforward movement and activation strategy. It is also recommended that the Draft DCP to be further amended to ensure:

- public through site link along the western boundary will be delivered
- a clear separation between public and private open spaces is provided
- activation is provided to ensure CPTED outcomes are achieved

The ADG requires communal open spaces are to be provided on both the ground and on the rooftops at a minimum of 25% of the site area. The total communal open space area of 1,400sqm is proposed (page 10 of SJB’s Urban Design Report), which is only about 13% of the site area. The proposed publicly accessible open space on the ground level, although 9% (1,000sqm) of the site area, is not counted towards private communal open space. Therefore, the proposal does not comply with the ADG communal open space requirement.

The Proponent indicates that the deep soil area is collocated with the ground level communal open space and complies with the ADG 15% requirement. It will be beneficial to provide a deep soil area location diagram to confirm the sizes and locations.

**Recommendation**

Private communal open space provision must comply with the ADG. The proposed private communal open space should achieve a minimum of 25% of the site without being reliant upon the publicly accessible open space. This may include limited rooftop spaces. The Proponent

*should also provide a diagram to illustrate the sizes and locations of the proposed deep soil zones.*

## **11.0 Land Use and Amenity**

The proposal will provide a mix of uses within the site. Ground floor level plates are proposed to accommodate non-residential uses with residential units on the upper levels. The proposed uses align with the PRCUTS recommendations.

A total area of 2,000sqm non-residential floor area is proposed in the 2022 Planning Proposal compared with 3,000sqm in the previous iteration. We understand that the proponent has included this to address some of Council's concerns regarding loss of employment space on this site should it be rezoned to R3. It should be noted that Council is undertaking an independent Economics Peer Review of the issue across the LGA.

The Proponent's report and Draft DCP mentions a range of uses will be provided on site such as 'light industrial and urban services, creative industries, health facilities, education uses, and gymnasium, restaurants/cafes and local service businesses'. In order to retain flexibility for these uses the Proponent must demonstrate how adequate provision has been made as far as public access, parking, service, Heating, ventilation, and Air Conditioning (HVAC) requirements and spatial configuration in the Draft DCP to ensure that the flexibility of these uses is preserved. There may be a potential conflict of activities between the ground floor businesses / activities and the residential apartments above. The Draft DCP needs to demonstrate how these risks are intended to be managed. This may result in acoustic and air quality issues for the residential units above.

### **Recommendation**

*The Proponent should also refer to Council's Economics Peer Review. The Proponent is to further consider how the proposed uses, including light industrial, can coexist with the residential zoning and what are the appropriate design requirements to facilitate the proposed uses.*

The 2022 Planning Proposal complies with the ADG recommended solar access and cross ventilation percentages. The solar access to the ground floor communal open space also complies with the ADG according to the Urban Design Report. ADG building-to-building separation distances and boundary setbacks are also essential to ensuring appropriate amenity.

The 2022 Proposal provides a 3m separation distance between Buildings B/D and C. The ADG Chapter 3F recommends a 6m separation between blankwalls and habitable rooms. Therefore, the proposed separation is inadequate. 6m is required to provide for adequate amenity.

The proposal provides a 9m separation distance between Buildings A and B and Buildings D and E. To satisfy the ADG requirements for building-to-building separation these walls would need to be blank; 'non-habitable to non-habitable' rooms as indicated in the Draft DCP. The

reference scheme, however, illustrates apartments with habitable rooms and balconies along these building frontages therefore not complying with the Draft DCP.

#### **Recommendation**

*The 2022 Proposal does not provide a compliant ADG building-to-building separation. The Proponent should increase the separation between Buildings A and B, and Buildings D and E to min.12m. The separation between Building C and Buildings B/D should also be increased to 6m to provide a better urban and amenity outcome.*

Inadequate floor to floor height is proposed on the ground level of Building D. Only 3.4m ground level floor to floor height is proposed compared with the ADG recommendation of 3.3m ceiling height for residential building ground floor. This is to allow improved solar access and flexible uses on the ground level. This issue is further compounded by the intention of providing a flexible employment ground level. The proposed non-residential floor heights appear less than adequate to support the proposed uses.

The section and 3D views in the Urban Design Report also illustrate the basement extrusion along Davies Lane. However, no detailed information is provided to understand the scale of this extrusion. Basement above natural ground level should be minimised.

#### **Recommendation**

*Further information is to be provided in regard to basement extrusion along Davies Lane. The proposed ground level residential floor to floor height should comply with the ADG requirements, and the proponent's suggested land uses, to provide flexibility, functionality and adequate amenity. Refer to Council's Economics Peer Review for the suggested light industrial floor height.*

A mix of residential and non-residential parking spaces, loading, servicing and waste collection is indicated in the reference scheme. This arrangement does not properly separate residential from non-residential functions. It is also unclear how the ground floor non-residential uses will be serviced. Sharing residential lifts or lobby areas with non-residential uses is not acceptable. The Draft DCP Section 2.6 outlines that 'Building entries and lobbies for residential and non-residential uses are to be separated where possible'. This separation needs to be considered a 'must do' to ensure adequate safety, privacy and amenity for residents.

#### **Recommendation**

*A clear separation between residential and non-residential functions needs to be provided.*

## **12.0 Building Layout and Flooding**

The western edge of the site is flood prone with the southwestern corner along Lords Road identified as a high flood hazard. It is critical to understand the impact of the proposed building layout on the flooding behavior to avoid inundation on the adjacent properties and risks to building occupants.



Both Buildings A and B are on flood prone land, with Building A subject to high flood hazard. Flood Risk and Assessment report by Tooker+Associates has been provided together with the 2022 Planning Proposal. The assessment mentions that seven apartments, four terraces and non-residential floor areas are below the Probable Maximum Flood (PMF), which requires evacuation in the event of flood. This may limit the use of these areas.

Any proposed building footprint must be supported by Pre and Post development flood modelling - refer to the Leichhardt DCP Section E1.2 Water Management and Section E1.3 Requirements for Development of Flood Control Lots. This modeling has not been undertaken.

Flood related issue is critical to the proposal, as it proposes residential built form in a high flood hazard land. A total redesign of the scheme may be needed to address flood related issues, subject to Hydraulic Engineer's assessment

### Recommendation

*The proponent needs to undertake appropriate modelling to comply with Council requirements. The results of this study may trigger redesign of the scheme.*

## 13.0 Misalignments and Inadequate Information

The Proponent should clarify the following:

- The Draft DCP Figure 3 (see below) has a min. of 6m setback control for Building A, whereas the Urban Design Report section does not indicate this. The Draft DCP control, providing a continuous 6m setback along Lords Road to enable street tree planting etc., is supported.

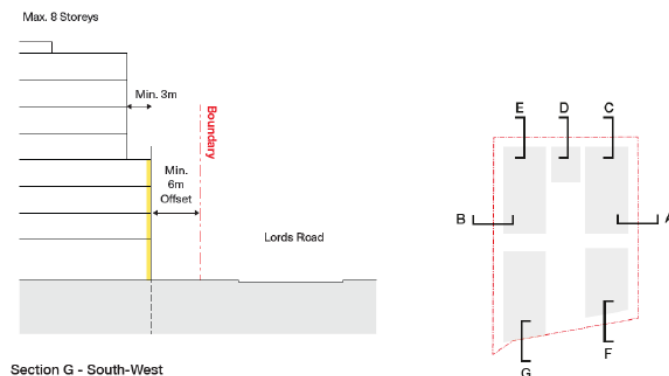


Figure 12 The Draft DCP Figure 3 Showing the Proposed Building A Setback to Lords Road (Source: SJB)

- The Davies Lane sections are not detailed enough to understand the proposed streetscape and the functions within the proposed 6m setback. Considering the basement extrusion along Davies Lane and tree removals etc., detailed street sections need to be provided.
- Lords Road footpath widening is identified by the Department of Planning and Environment and Inner West Council commissioned Cardno to undertake the Parramatta Road Corridor Precinct Wide Traffic and Transport Study. The Transport Plan identifies a 2.5m wide

footpath to Lords Road. The proposal's relationship with Lords Road footpath widening is to be demonstrated.

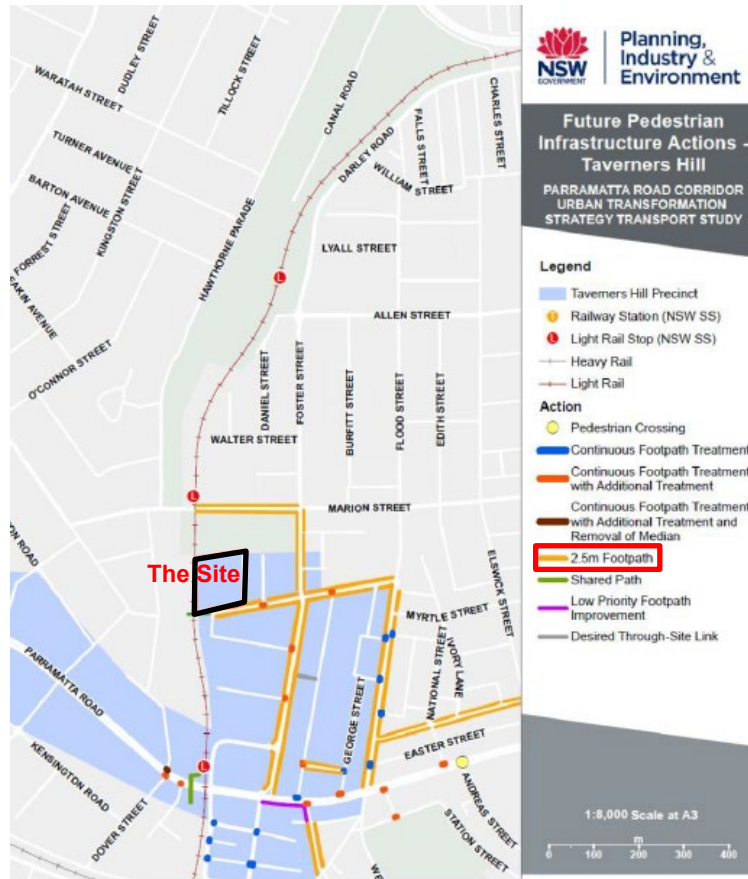


Figure 13 Lords Road Footpath Widening (Courtesy of the Department of Planning and Environment)

## 14.0 Affordable Housing Provision

The Draft DCP indicates that 5% affordable housing is to be provided on site.

## 15.0 Roof Form + Materiality

The site is within the West Leichhardt Distinctive Neighbourhood as identified in the Leichhardt DCP 2013 (LDCP 2013). The LDCP 2013 states that: 'building materials in West Leichhardt are generally red or brown smooth face brick with terracotta roof tiles, or timber weatherboard with corrugated iron roofing. Roof forms are mainly hipped or gabled with a pitch of between 30° to 45°'.

The Parramatta Road Corridor Urban Transformation Planning and Design Guidelines (the Guidelines) require that development should enhance the character of the locality. It is important for the new development to contribute to the current and evolving character of the area in a contemporary architectural language.

### **Recommendation**

*The Draft DCP should provide development controls which address the design of roof forms and building materiality, in line with the Guidelines.*

## **16.0 Visual Impact**

The Proponent has provided high level visual impact assessment of the proposal. No significant concerns are identified based on the information provided. However, as noted in Section 8 of this peer review, a 6m setback along the full extent of Lords Road is important in managing the building bulk when viewed from Kegworth Street.

## **17.0 Trees on Site**

The Proponent proposes to remove the existing trees along Davies Lanes and replace them with new trees. Arborist Report prepared by elke Arborist is provided.

### **Recommendation**

*Council's landscape architect to further review and comments on this matter. From an urban design outcome, retaining trees where possible is preferred.*

## **18.0 Sustainability + Ecology**

The Draft DCP provides sustainability guidance for the future development of the site.

### **Recommendation**

*Council's urban ecology officer to comment on the 2022 Planning Proposal. The Proponent should also reference to the PRCUTS sustainability requirements.*

## **19.0 Conclusion**

The site contains active light industrial precinct with 19 separate tenancies and is situated in a quiet, fine grained, low density 'leafy' residential context with direct interface with the heritage building at 20-22 Foster Street, Leichhardt and the GreenWay. This calls for a sensitive urban design, architectural and landscape design response.

The 2022 Planning Proposal addresses many of the challenges and achieves a number of improved design outcomes, including:

- Height and Floor Space Ratio (FSR) alignment with PRCUTS
- Increase street setback along Davies Lane
- Removal of Davies Lane vehicular access
- Increased setback to Lords Road and Davies Lane

The proposal however still presents a number of urban design issues, including street setback, access, pedestrian circulation, non-residential use functionality and residential amenity. The following dot points provide an overall summary of the key urban design recommendations identified during this review:

1. Urban Design Scheme must address the full PRCUTS proposed zoning changes (RE1 and R3 and the associated FSR and HOB)
2. Urban Design Scheme must adequately address flood issues and include Council flood study requirements
3. Ensure the proposed streetwall height complies with the PRCTUS recommendation
4. Ensure public and private open spaces; residential and non-residential uses are separated
5. Provide adequate communal open space that complies with the ADG, in the right locations
6. Comply with the ADG separation distances
7. Strengthen the sense of address by improving legibility of residential pedestrian circulation 'street' within the site
8. Provide adequate floor heights suitable to the proposed uses
9. Ensure the proposed built form envelopes work together with the proposed development controls
10. Amend the misaligned information and provide additional information required

Although the 2022 Planning Proposal presents a better design outcome compared to the previous iteration, given the extent of issues noted above, the design cannot be supported in its current form. A revised scheme should be prepared that addresses these and submitted for further review.

## Appendix

Please find attached the following appendix:

- Appendix A – PRCUTS Compliance Table

Chapter No.	Section	Guideline	Comment
3 - Corridor Guidelines	3.1 Urban Structure (Corridor East)	<i>Opportunities will be leveraged through the development of the Taverners Hill Precinct to unlock local streets and improve permeability and provide more open space north of Parramatta Road.</i>	3.1 – Comply - The site is within Taverners Hill Precinct and has approximately 90m frontage along Lords Road. The site is not currently publicly accessible as it is occupied by light industrial uses. The proposed north-south and east-west pedestrian linkages will increase the site's permeability, from and to the GreenWay corridor and potential secondary GreenWay corridor to the east of the Light Rail embankment, which will benefit local residents.
	3.2 Heritage & Fine Grain	<i>a Ensure that development in the vicinity of heritage items is designed and sited to protect the heritage significance of the item.</i>	a – Comply - A Local Heritage listed house at 20-22 Foster Street, Leichhardt is located at the southeast corner of Lambert Park lot (legally described as Lot 658 in DP 729265) under the IWLEP 2022. The proposal provides a 4-storey streetwall height and 6m setback to the common boundary. This is acceptable from the Urban Design perspective.  An existing row of tall and dense trees is located in the GreenWay to the west of the Light Rail which would screen the development from the HCA further west. The rows of tall trees along the GreenWay assists in transitioning the scale of the proposed new buildings, of up to eight storeys.
		<i>b New development in heritage conservation areas must be designed to respect neighbouring buildings and the character of the area. Infill development should enhance and complement existing character but not replicate or mimic the architectural style, detailing or materiality of listed heritage/historic buildings.</i>	b – NA - Not in an HCA.
		<i>c Maintain architectural, streetscape and interpretive building elements that contribute to heritage conservation areas.</i>	c – NA - Subject to detailed design at DA stage.
		<i>d In appropriate locations, enable the consolidation of small individual lot into larger lots, but ensure the original subdivision pattern is represented or interpreted, where it is assessed as being significant.</i>	d - N/A
		<i>e Encourage fine grain subdivision for large sites undergoing renewal.</i>	e - N/A - The 2022 Planning Proposal is not a land subdivision proposal.
		<i>f Maintain the prominence and legibility of heritage items, contributory buildings and streetscapes while appropriately siting and designing new development.</i>	f – Comply - The site adjoins Lambert Park which includes a Local Heritage listed house at 20-22 Foster Street, Leichhardt under the IWLEP 2022. The proposal provides a 4-storey streetwall height and 6m setback to the common boundary. This is acceptable from the Urban Design perspective.
		<i>g Ensure that new developments are of a compatible scale with the surrounding heritage items, contributory buildings or for the heritage conservation area.</i>	g – Comply - The buildings transition in height with landscape setbacks to the surrounding residential context. The tallest building in the development is setback from the Lords Road and Davies Lane frontages, and is situated along the west, Light Rail/GreenWay frontage.
		<i>h Retain the prominence of heritage landmark buildings in the immediate streetscape, in the surrounding area, and from key vantage points.</i>	h – NA
		<i>i Ensure that new developments are of an appropriate form and mass adjacent to or in the vicinity of heritage items, contributory buildings or heritage conservation areas.</i>	i - Non-Compliance -. Building A needs a 6m street setback along Lords Road to provide a continuous streetscape, enable tree planting and potentially reduce visual impact.
<i>j Ensure new development does not physically overwhelm or dominate heritage items and heritage conservation areas by providing appropriate transitions from new development sites to existing buildings, structures and streetscapes of heritage value.</i>	J - Comply - The site adjoins Lambert Park which includes a Local Heritage listed house at 20-22 Foster Street, Leichhardt under the IWLEP 2022. The proposal provides a 4-storey streetwall height and 6m setback to the common boundary. This is acceptable from the Urban Design perspective.		



Chapter No.	Section	Guideline	Comment
		<i>k Use sympathetic materials, colours and finishes that reflect and harmonise with original materials to maintain the character of heritage items and contributory buildings.</i>	K – NA - Subject to detailed design at DA stage.
		<i>l Ensure design resolution is considered in totality, and in particular at the pedestrian scale.</i>	J - Non-compliance - Building A has not provided the recommended 6m setback along Lords Road. This arrangement eliminates the tree planting opportunity along this section of Lords Road and will contribute to the building bulk when viewed from Kegworth Street.  The proposal's does not appear to have considered the proposed widening to Lords Road footpath as identified in the Parramatta Road Corridor Precinct Wide Traffic and Transport Study.
		<i>m Reinforce and enhance the distinctive character of the historic retail strips along Parramatta Road.</i>	m - N/A
		<i>n Retain, conserve and interpret significant historic signs.</i>	n - N/A
		<i>o Protect the significant characteristics of buildings, streetscapes, vistas and the city skyline, while encouraging well-designed and well positioned signs which contribute to the vitality of the roadway and locale.</i>	o – NA - No signage information has been provided to assess this guideline.
		<i>p Signage design and location must conserve the heritage significance of an item or heritage conservation area.</i>	p – NA - No signage information has been provided to assess this guideline.
		<i>q Retain, conserve and/or reuse historic fabric in historic areas, where appropriate.</i>	q – Comply - There is no heritage listed item on the site. However, the site adjoins Lambert Park which includes a Local Heritage listed house at 20-22 Foster Street, Leichhardt under the IWLEP 2022. The proposed 4-storey streetwall height and 6m setback to the northern and eastern boundaries response to the low scale heritage item in the vicinity.
		<i>r Promote characteristic and desirable landscape treatments in different character areas.</i>	r - Non-compliance - The landscape design and the placemaking intention along the east-west through site link do not align. Insufficient information is provided regarding Davies Lane and Lords Road streetscapes, including landscape design intension. The Proponent should revisit the landscape strategy to ensure alignments and provide adequate information for further assessment.
	3.3 Creek & Watercourses	-	NA - Hawthorne Canal is located to the west of the Inner West Light Rail embankment. There are no creeks and watercourses on or adjoin the site.
	3.4 Open Space & Public Domain (A. Open Space Requirements)	<i>a Protect and improve the quality, access and safety of existing open space.</i>	a – Comply - The GreenWay corridor is located to the west of the Light Rail. A 6m landscape setback to the western boundary and a new footpath is proposed. This will potentially create a secondary GreenWay corridor to the east of the Light Rail and is supported from an Urban Design perspective. It should be noted that while this improved the functionality of existing open spaces, it does not comply with the zoning strategy identified in PRCUTS.
		<i>b Provide new public open space that is:</i> <i>i. part of a legible Green Grid network within and beyond the Corridor</i> <i>ii. landscaped and includes substantial areas for high quality and sustainable landscaping</i> <i>iii. an appropriate size to accommodate a variety of uses</i> <i>iv. suitably dimensioned and designed for the intended use in terms of</i>	a – Non-compliance - A 6m secondary GreenWay corridor to the east of the Light Rail is proposed along the western boundary of the site however this is not indicated on public land per PRCUTS.  i to xi – NA - A 'Publicly Accessible Open Space' is proposed at the centre of the development. Detailed landscape plans should be provided in the DA stage.

Chapter No.	Section	Guideline	Comment
		<p><i>quality and orientation</i></p> <p><i>v. flexible and easily adapted to different uses in response to changing community activity and passive recreational preferences and are useable in a range of weather conditions</i></p> <p><i>vi. vibrant, inclusive, accessible and safe</i></p> <p><i>vii. linked to pedestrian and cycle paths to encourage reduced car dependency</i></p> <p><i>viii. integrated with the public domain, creeks, watercourses, or other encumbered land, if appropriate</i></p> <p><i>ix. designed to achieve sharing of space between sports</i></p> <p><i>x. located with access to, or makes provision for, recycled or other sustainable water supply</i></p> <p><i>xi. capable of being well maintained.</i></p>	
	3.4 Open Space & Public Domain (B. Public Domain Principles)	<i>a Increase canopy cover and provide for greenery within the public domain.</i>	a – Comply - The 2022 Planning Proposal has 22% tree canopy coverage compared with 10% existing
		<i>b Build local character and identity through existing site qualities and natural landscape features.</i>	b – Comply – see above
		<i>c Ensure public domain and common or shared spaces are functional and attractive for their intended users and accessible to all.</i>	c - Non-compliance - Proposed private communal open spaces are provided on the ground level and on the roofs of the Buildings A, B, D and E, however, the total private communal open space area of 1,400sqm is only about 13% of the site area. This does not comply with the relevant ADG requirements.
		<i>d Create public domain that promotes recreation and public engagement.</i>	d – Comply - More than 50% of the ground floor open space will receive more than 2 hours sunlight access in mid-winter according to the Urban Design Report provided by the Proponent.
		<i>e Increase the quality and usability of the public domain through innovative built form, wider footpaths and new connections.</i>	<p>e – Non-compliance - A 6m street setback is provided along east, west and north boundaries of the site. However, Building A proposes to have a 6m street setback on the ground level only with upper floors cantilevered over the setback zone. This arrangement eliminates the tree planting opportunity along this section of Lords Road.</p> <p>The proposed north-south and east-west pedestrian linkages will increase the site's permeability, from and to the GreenWay corridor, which will benefit local residents. It is unclear the function and purpose of the shared path along Building A. There will be significant impact on pedestrian movement and function of the open space, if this shared path is to provide loading and unloading services to the ground floor non-residential uses.</p>
		<i>f All new streets should implement water sensitive urban design treatments at the point source across all catchment areas.</i>	f – Inadequate information - Additional Information is needed. There is insufficient information to assess whether water sensitive urban design treatments are considered.
		<i>g Provide permeable ground surfaces, where appropriate, to allow rainwater to penetrate the soil.</i>	g – Inadequate Information - Additional Information is needed. Based on the Urban Design Report, deep soil areas are provided co-located with ground level communal open space, achieving the ADG area requirement. However, there is no diagram illustrating the sizes and locations of the proposed deep soil zones to assess and confirm the ADG compliance.

Chapter No.	Section	Guideline	Comment
	3.5 Community Facilities	<p><i>a Consider providing high quality specialised spaces that are shared by developments rather than treating each development as a stand alone proposal.</i></p> <p><i>b Provide opportunities for a variety of experiences and social interaction.</i></p> <p><i>c Provide opportunities for structured and unstructured activities and cater to a diverse range of users.</i></p> <p><i>d Create diverse 24 hour activity by providing facilities and spaces for public activity outside regular business hours.</i></p> <p><i>e Provide varied spaces for social interaction.</i></p>	a to e – NA - Detailed design of the proposed publicly accessible open space is to be provided at DA stage. However, it is suggested that the Draft DCP to include the provisions to ensure the alignments with the PRCUTS.
	3.6 Traffic and Transport 3.7 Street Function	-	3.6 c & d - Non-compliance - A new shared path is proposed between Building A and the publicly accessible open space. It is unclear the function and purpose of the shared path along Building A. There will be significant impact on pedestrian movement, if this shared path is to provide loading and unloading services to the ground floor non-residential uses. Therefore, this does not fully align with the recommendation of 'Improve public and active transport quality, access and connectivity' and providing greater level of street activity.
	3.8 Car Parking & Bicycle Parking	-	3.8 – NA - The 2022 Planning Proposal considers car parking rates based on LDCP, PRCUTS and Housing SEPP. To be confirmed at the DA stage.
	3.9 Active Transport	-	3.9 - Inadequate Information - Additional footpaths and links are proposed that will enhance the access network. However, there is insufficient information provided to show the proposed path along Davies Lane and the proposal's interface with the Lords Road footpath widening.
	3.10 Sustainability & Resilience	-	3.10 – NA – To be addressed at the DA Stage. The Proponent should demonstrate that the 2022 Planning Proposal satisfies 3.10 c, which requires maximising canopy cover to target min. 60% over all pedestrian spaces. The Draft DCP provides sustainability guidance for the future development of the site, this is supported.

Chapter No.	Section	Guideline	Comment
4 – Built Form Guidelines	4.1 Block Configuration and Site Planning	<p><i>a Respond to the scale of surrounding buildings and definition of the street networks and public spaces.</i></p> <p><i>b Protect and enhance the rich, distinctive and valued character of the Corridor, particularly those elements that contribute to a sense of place and identity.</i></p> <p><i>c Arrange building forms (including heights and massing) to reinforce the future desired structure and character of the area as set out in the relevant Precinct and Frame Area Guidelines.</i></p> <p><i>d Ensure that buildings address the street, laneway, new through-site link or open space.</i></p> <p><i>e Define street edges with low rise buildings or appropriately scaled podiums to create a pedestrian scale at street level. Sleeve larger buildings with finer grain active frontages to the street and public domain.</i></p> <p><i>f Provide appropriate building separation to protect privacy and solar access to private and public property.</i></p> <p><i>g Emphasise building corners on key streets to signify key intersections and enhance public domain legibility.</i></p> <p><i>h Consider possible future development on adjoining sites.</i></p>	<p>a – Comply - Generally low-scale single-storey detached houses form the site's current context (along with Lambert Park to the north and the Greenway corridor to the west). PRCUTS identifies a planned change in the current surrounding built context: proposing an up-zoning in residential use, establishing a building height control (currently there is no height control) and increasing the density for properties to the east and south – from the current R1 General Residential, to R3 Medium Density Residential; establishing a height of building of 17m (up to 5 storeys), and an increase in density from the current 0.5 (or 0.8):1 FSR to an FSR of 1.4:1.</p> <p>b – Comply</p> <p>c – Comply - The proposal steps up from the east (Davies Lane) and south (Lords Road) edges to the tallest proposed building, set within the site, situated along the west, Light Rail/GreenWay, edge. It provides a progressive stepping up in building height across the site, providing a lower height and scale along Davies Lane.</p> <p>d – Non-compliance – The proposed east-west through site link does not align with this.</p> <p>e – Non-compliance – Building A does not have adequate setback.</p> <p>f – Non-compliant – Some internal building setbacks are not ADG compliant. The proposal provides a 9m separation distance between Buildings A and B, and Buildings D and E. The reference scheme illustrates habitable windows in this location. Therefore, a minimum of 12m separation is required by the ADG to provide adequate residential amenity in this situation.</p> <p>g – NA – Site does not have this condition</p> <p>h – Comply – The proposal has been developed to be compatible with anticipated adjacent development.</p>
	4.2 Building Massing, Scale and Building Articulation ( A. Building Massing and Scale Requirements)	<p><i>a Relate building height to street width and intended character.</i></p> <p><i>b Buildings, or their individual elements, should be appropriately scaled to address and define the surrounding character.</i></p> <p><i>c Reduce heights, increase setbacks or provide appropriate transitions to heritage buildings and places or sensitive uses.</i></p> <p><i>d Changes in scale should be explored to create interest and enhance the relationship with the public domain.</i></p> <p><i>e The GFA is to be no more than 75% of the building envelope.</i></p>	<p>a – Comply - The tallest building in the development is situated along the west, Light Rail/GreenWay frontage.</p> <p>b - Non-compliance - Building A must provide a 6m street setback on Lords Road.</p> <p>c – Comply - The tallest building in the development is situated along the west, Light Rail/GreenWay frontage.</p> <p>d – Comply - The tallest building in the development is situated along the west, Light Rail/GreenWay frontage.</p> <p>e - Comply.</p>

Chapter No.	Section	Guideline	Comment
			The Proponent calculates the GFA based on the reference design. The GBA to GFA efficiency rate is generally aligns with this.
		<i>f Floor plates above 8 storeys should be limited to 750m<sup>2</sup> GFA to create slender tower forms.</i>	f - N/A - The tallest building proposed is eight storeys in height. This provision does not apply to the proposal.
		<i>g The maximum building length should not exceed 60m.</i>	g – Comply - The Draft DCP includes this provision.
		<i>h The maximum tower length should not exceed 45 metres and is to be considered in conjunction with tower floor plate controls.</i>	h - Comply - The Draft DCP includes this provision.
		<i>i Identify and express street frontage heights with an upper level tower to create an appropriate streetscale, sky views, and minimise wind down draft.</i>	i - Non-compliance - The recommended continuous 6m setback along Lords Road has not been provided.
	4.2 Building Massing, Scale and Building Articulation (B. Building Articulation Principles)	<p><i>a Apply the relevant building articulation principles illustrated in Figures 4.2 - 4.7, based on location.</i></p> <p><i>b The maximum wall length without articulation is 45m.</i></p> <p><i>c Articulate building facades in plan and elevation to reduce the appearance of building bulk and to express the elements of the building's architecture.</i></p> <p><i>d Interpret and respond to the positive attributes of a Precinct or Frame Area by incorporating dominant patterns, textures and compositions into the built form.</i></p> <p><i>e Provide a sense of address and visual interest from the street through the use of insets and projections that create interest and, where relevant, the appearance of finer grain buildings, however avoid recesses that undermine the safety of the public domain.</i></p> <p><i>f Integrate ventilation louvres and car park entry doors into facade designs where located on street frontages.</i></p> <p><i>g Buildings on corners should address both streets.</i></p>	<p>a – Comply - Five independent buildings are proposed on the site with reduced length compared with the previous iteration. The Draft DCP includes provisions in regard to building length and articulation, which is supported.</p> <p>b - Comply</p> <p>c, d, e, f – NA - Detailed building façade design has not been provided. Further assessment is needed at DA stage.</p> <p>g – NA – The site does not have this condition</p>
	4.3 Setbacks and Street Frontage Heights	<p><i>a Provide building setbacks and street frontage heights in accordance with Table 4.1.</i></p> <p><i>b Reinforce street edges that contribute to the character of a historic or heritage conservation area.</i></p> <p><i>c Design setbacks that will contribute positively to the pedestrian environment at street level.</i></p> <p><i>d Retail shop fronts should reinforce the streetscape edge and integrate with footpath activity through transparent store front activity, where possible.</i></p>	<p>a - Non-compliance - The streetwall height facing the GreenWay does not comply with the maximum of 18m. The 8-storey built form does not have any secondary setback on the upper levels facing the western boundary.</p> <p>b – Comply - A 6m setback to Davies Lane is proposed, which aligns with CM+ 2019 Peer Review of providing a wider setback to accommodate footpath and retain the trees.</p> <p>c - Non-compliance – 6m setback for the full frontage of Lords road needs to be provided</p> <p>d – NA – To be addressed at the DA stage</p>

Chapter No.	Section	Guideline	Comment
	4.4 Transition Zones and Sensitive Interface	<p><i>a Implement the transitions and sensitive interfaces in accordance with the Guidelines for individual Precincts and Frame Areas illustrated in Figures 4.8 - 4.13.</i></p> <p><i>b Encourage the gradual stepping up of the built form at the interface of existing low rise development and proposed higher rise development.</i></p> <p><i>c Encourage new development that is sensitive and complementary in scale and site location to surrounding properties of identified heritage and/or streetscape value, and which contributes positively to the desired character of the street or area concerned.</i></p>	a, b & c - Refer to the comments in Section 4.1 Block Configuration and Site Planning.
	4.5 Building Typologies	-	<p>Inadequate Information - Additional Information is needed. We understand that Council has issues with the potential loss of industrial / employment land. Therefore, Council is currently undertaking an independent Economics Peer Review to determine the adequacy of the proposed non-residential floor space and its potential impact.</p> <p>The Draft DCP mentions a range of uses will be provided on site such as 'light industrial and urban services, creative industries, health facilities, education uses, gymnasium, restaurants/cafes and local service businesses'. The proposal needs to demonstrate how the design and DCP provide adequate controls to ensure spaces allow for the delivery of these.</p>
	4.6 Active and Commercial Frontages	<p><i>a Locate Active Frontages and Commercial Frontage on streets and fronting open space, urban plaza and public domain generally in accordance with the Guidelines for the relevant Precinct and Frame Area.</i></p> <p><i>b Create a fine grain of Active and Commercial Frontages to ensure an integrated street edge and reduce building massing.</i></p> <p><i>c Encourage ground floor activities to spill out into the public domain to create a vibrant streetscape and promote a sense of community.</i></p> <p><i>d Screen large retail tenancies by smaller tenancies for greater street activation and retail variety where appropriate.</i></p> <p><i>e Provide clearly defined and visible building entries which directly address the street.</i></p> <p><i>f Provide awnings or colonnades for weather protection and shade along active frontages.</i></p>	<p>a - Comply. - Majority of the future non-residential uses will face the central open spaces proposed.</p> <p>e - Non-compliance - Residential entries for Buildings A, B and D rely on the proposed façade indentations, which result in long and narrow corridors leading to recessed lift cores. This design outcome is not desired. More generous residential lobby areas need to be provided accommodating seating and gathering places. The Building E ground level reference scheme presents a better lobby design compared with the rest. This will also assist with wayfinding and contribute positively to the sense of address within the proposed development.</p> <p>c – Non-compliance - It is unclear how the ground floor non-residential uses will be serviced. Sharing residential lifts or lobby areas is not acceptable.</p>



Chapter No.	Section	Guideline	Comment
	4.7 Building Entries and Fencing	<p><i>a Accentuate building entries through signage, street numbers and landscaping.</i></p> <p><i>b Achieve a fine grain of entries along streets to reinforce activation, movement in and out of buildings, and for multiple 'eyes on the street'.</i></p> <p><i>c Ground floor dwellings should be accessed from the street, where possible.</i></p> <p><i>d Avoid car parking entries and loading docks on main streets. The location and widths of any services, infrastructure and car park entries on Active Frontages must be minimised.</i></p> <p><i>e Where possible, use low level, transparent or partially open fencing is proposed.</i></p> <p><i>f Front fencing should respect existing character or contribute to the future desired character.</i></p>	<p>a – NA - This is subject to detailed design.</p> <p>b - Non-compliance - The proposed pedestrian circulation around the central open space is to be strengthened. A clear and strong pedestrian circulation, that links all the residential lobbies, is needed to improve the proposal's sense of address, in particular, for the buildings deep inside the block.</p> <p>c – Non-compliance - Ground floor units with individual address points are needed.</p> <p>d – Comply - Car parking and service access is proposed at from Lords Road.</p> <p>e &amp; F – N/A - Fencing, where required, would be addressed at DA stage.</p>
	4.8 Amenity (A. View Requirements)	<p><i>a. Protect significant views to and from public places.</i></p> <p><i>b. Configure built form to enhance or frame views to significant places or elements, or support legibility of the area.</i></p> <p><i>c. Buildings should not to impede key views from the public domain to important public places, parks, heritage buildings and monuments.</i></p>	<p>a - Comply.</p> <p>b – Comply - A 6m setback along the west edge will open up views along the GreenWay. The proposal central open space can be viewed from Lords Road.</p> <p>c – Comply - A continuous 6m setback along Lords Road will assist with the views to Hawthorn Pedestrian Tunnel which provides access to GreenWay.</p>
	4.8 Amenity (B. Shadowing and Solar Access Requirements)	<p><i>a. Orientate taller elements north-south to minimise overshadowing.</i></p> <p><i>b. Manage height of east-west buildings to allow solar access to courtyard spaces and adjoining open space and roads.</i></p> <p><i>c. Maximise direct solar access to adjoining properties.</i></p> <p><i>d. Minimise shadowing of public and private open space.</i></p>	<p>a - Comply. The Proponent demonstrates that the proposal's alignment with the relevant ADG solar access requirements to the proposed residential units and communal open spaces.</p> <p>c – Comply - The shadow diagrams provided illustrate that the proposal does not have major overshadowing impact to the surrounding areas.</p> <p>d- Comply - The shadow diagrams provided illustrate that the proposal does not have major overshadowing impact to the surrounding areas.</p>
	4.8 Amenity (C. Visual and Acoustic Amenity Requirements)	<p><i>a. Orient and design development to optimise visual and acoustic privacy between buildings.</i></p> <p><i>b. Configure and landscape internal courtyards to optimise visual privacy whilst also allowing passive surveillance opportunities.</i></p> <p><i>c. Attenuate noise impacts between residential and non-residential components of mixed use development.</i></p> <p><i>d. Employ design measures to minimize loss of privacy.</i></p>	<p>a – Non-compliance - The proposal provides a 9m separation distance between Buildings A and B and Buildings D and E. To satisfy the ADG requirements for building-to-building separation these walls would need to be blank; 'non-habitable to non-habitable' rooms. This is what the Draft DCP suggests. However, the reference scheme illustrates apartments with habitable rooms and balconies along these building frontages.</p> <p>b – Non-compliance – see a above. Design needs to be amended to meet ADG recommendations</p> <p>c – Non-compliance - If light industrial uses are retained on the site at the ground floor level, there is a potential conflict of land uses between the ground floor businesses and activities and the residential apartments on the levels above. The DCP needs to include mitigation measures.</p> <p>d – Non-compliance – see a above. Design needs to be amended to meet ADG recommendations.</p>

Chapter No.	Section	Guideline	Comment
	4.8 Amenity (D. Air and Noise Quality Requirements)	<p><i>a. Development on busy roads (an annual average daily traffic volume of more than 40,000 vehicles) is to consider the provisions of the State Environmental Planning Policy (Infrastructure) 2007 and Development Near Rail Corridors and Busy Roads Interim Guidelines.</i></p> <p><i>b. Internal habitable rooms of dwellings are to be designed to achieve internal noise levels of no greater than 50dBA.</i></p> <p><i>c. Adopt the planning and design approaches and architectural treatments outlined in Figure 4.14 - 4.21 to minimise noise and air quality impacts from abutting busy roads, rail corridors and other noise-generating land uses.</i></p> <p><i>d. Consider the Indicative Floor Plans at Appendix A when designing development on busy roads.</i></p>	a, b , c & d – N/A - To be addressed at detailed design stage.
	4.9 Accessibility, Safety and Security (A. Accessibility Requirements)	<p><i>a. Ensure that public buildings and spaces are designed to be universally accessible.</i></p> <p><i>b. Incorporate accessibility into the design of new buildings, public spaces and the public domain.</i></p> <p><i>c. Incorporate solutions which lead to an improvement in accessibility and freedom of choice offered to the user.</i></p> <p><i>d. Accommodate a wide range of ancillary aids and support interactive usage through open space and public domain.</i></p> <p><i>e. Consider changing lifestyles and changing use of space.</i></p> <p><i>f. Incorporate adaptable dwelling opportunities to cater for occupants with a disability.</i></p>	a, b , c & d – N/A - To be addressed at detailed design stage.
	4.9 Accessibility, Safety and Security (B. Safety and Security Requirements)	<p><i>a. Ensure the design for new public spaces, streets and new development minimises crime and supports community safety by applying Crime Prevention Through Environmental Design.</i></p> <p><i>b. (CPTED)'s Safer by Design Guidelines.</i></p> <p><i>c. Encourage passive surveillance of streets and other public places.</i></p> <p><i>d. Ensure ground floor uses to buildings edging public space are predominantly active.</i></p> <p><i>e. Minimise opportunities for concealment or entrapment by removing or illuminating alcoves, or designing alcoves with splayed edges.</i></p> <p><i>f. Maintain unobstructed sightlines between and around buildings wherever possible.</i></p> <p><i>g. Remove or redesign any physical features that are known to compromise safety and security.</i></p>	<p>a - Refer to Section 4.6 Active and Commercial Frontages.</p> <p>b - Proponent to provide at DA staged a CPTED Report to illustrate how the development addresses the applicable safety and security principles and guidelines.</p> <p>c &amp; d – Non-compliance - The proposed east-west link is encumbered by the shared path, parking spaces, and a row of north-south trees close to Building E. A series of planters along the building façades prevent ground level from having active uses opening up onto the link, reducing passive surveillance.</p> <p>e – Comply</p> <p>f – Comply</p> <p>g – Non-compliance - redesign of the proposed ground floor open spaces is needed.</p>

Chapter No.	Section	Guideline	Comment
		<p><i>h. Improve the quality of lighting in streets, parks and other public spaces.</i></p> <p><i>i. Create landscapes and physical locations that channel and group pedestrians into target areas.</i></p>	<p>h – N/A – To be addressed at detailed design stage</p> <p>i – Non-compliance - redesign of the proposed ground floor open spaces is needed.</p>
	4.10 Signage and Advertising	<p><i>a. Signage is to comply with the requirements of State Environmental Planning Policy No 64-Advertising and Signage.</i></p> <p><i>b. Encourage quality signage that contributes positively to the streetscape and creates a sense of place. Advertising signs should complement the design of buildings and the overall character of streets and Precincts and Frame Areas.</i></p> <p><i>c. The main facades of buildings from the first floor to the rooftop or parapet are to be uncluttered and generally free of signage.</i></p> <p><i>d. Freestanding signs are not to be located on the top of buildings and should not impact on the skyline when viewed from the street.</i></p> <p><i>e. Provide appropriate directional, informational and regulatory signage.</i></p> <p><i>f. Signage must relate to an approved use on the property/site.</i></p> <p><i>g. Incorporate clear signage for access and egress around public transport and public places.</i></p> <p><i>h. Signs painted on or applied to the roof of a building are not permitted.</i></p> <p><i>i. Despite any other requirements, existing signs that have heritage value must be retained where appropriate, preferably in their original location, or adaptively reused.</i></p>	<p>a through h – N/A- To be addressed at detailed design stage</p>
10 – Taverners Hill Guidelines	10.4 Future Character and Identity	<p><i>The vision can be realised by:</i></p> <ul style="list-style-type: none"> <li><i>positioning Taverners Hill as a transit oriented development to capitalise on the existing rail service provision and the rapid transit network along Parramatta Road</i></li> <li><i>encouraging appropriately scaled residential uses and a mix of employment and non-residential uses and a variety of creative industries</i></li> <li><i>retaining the heritage and fine grain industrial character and appropriately transitioning new, higher-density development to existing areas and conservation areas</i></li> <li><i>providing clearly defined, high quality and safe pedestrian and cycling linkages to both light and heavy rail stations and across Parramatta Road</i></li> <li><i>enhancing access to open space areas to the north, the GreenWay as well as Leichhardt (Norton Street) in the east</i></li> <li><i>creating pockets for urban spaces and high pedestrian activity by introducing new laneways and pedestrian prioritised linkages which enhance permeability, provide activated streetscapes, and link new developments, key uses and activities across the Precinct completing</i></li> </ul>	<p>The proposal steps up from the east (Davies Lane) and south (Lords Road) edges to the tallest proposed building, set within the site, situated along the west, Light Rail/GreenWay, edge. It provides a progressive stepping up in building height across the site, providing a lower height and scale along Davies Lane. Upper-level setbacks above the four-storey streetwall height are provided along Lords Road and Davies Lane. The setback provides a transition between the medium density residential buildings on the site and the relatively low density residential area to the east.</p> <p>The proposed link along the western boundary which will potentially connect to Marion Light Rail Station. The proposed east-west pedestrian linkages will increase the site's permeability, from and to the GreenWay corridor, which will benefit local residents.</p> <p>The Proponent's report and Draft DCP mentions a range of uses will be provided on site such as 'light industrial and urban services, creative industries, health facilities, education uses, and gymnasium, restaurants/cafes and local service businesses'. In order to retain flexibility for these uses the Proponent must demonstrate how adequate provision has been made as far as public access, parking, service, HVAC requirements and spatial configuration in the Draft DCP to ensure that the flexibility of these uses is preserved. There may be a potential conflict of activities between the ground floor businesses / activities and the residential apartments above. The Draft DCP needs to demonstrate how these risks are intended to be managed. This may result in acoustic and air quality issues for the residential units above. The</p>

Chapter No.	Section	Guideline	Comment
		<p><i>missing links along the GreenWay at Parramatta Road and Longport Street</i></p> <ul style="list-style-type: none"> <li>• <i>designing for the impact of major through-traffic roads</i></li> <li>• <i>addressing aircraft noise.</i></li> </ul>	<p>development massing is broken down in scale by creating five smaller buildings rather than one or two larger ones. This approach also provides good permeability through the site, and enhances access of workplaces and apartments to natural light and ventilation.</p> <p>Further, the apparent scale of the built form is reduced by lowering the height of buildings along Davies Lane frontage. The scale of the new development is further mitigated by setting back 6m along the Davies Lane frontage. Upper level setbacks of 3m are proposed for buildings along the Lords Road and Davies Lane frontages which would reduce the apparent scale of these building elevations.</p> <p>A new two storey building is proposed in between Buildings B and D. The proposal provides a 3m separation distance between Buildings B/D and C. 6m is suggested to provide a more desirable urban outcome.</p> <p>However, Building A becomes an anomaly along Lords Road. It proposes to have a 6m street setback on the ground level only with upper floors cantilevered over the setback zone. This arrangement eliminates the tree planting opportunity along this section of Lords Road and will contribute to the building bulk when viewed from Kegworth Street.</p> <p>Refer to the Peer Review Report for detailed comments.</p>
	<p>10.5 Open Space, Linkages and Connections and Public Domain</p>	<p><i>A. Open Space Requirements</i></p> <p><i>a. Provide a new urban plaza or park midway along Tebbutt Street to Flood Street.</i></p> <p><i>b. Wherever possible, provide a series of connected open spaces through future development to achieve a diverse sequence of open spaces, uses and active frontages.</i></p> <p><i>c. Rethink the design and security arrangements of Kegworth Public School to allow the school playground to be used publicly after school hours (whilst maintaining school security requirements during school hours).</i></p> <p><i>d. Promote roof top communal open space.</i></p> <p><i>B. Linkage and Connection Requirements</i></p> <p><i>a. Create new green lungs on north-south oriented streets that are perpendicular to Parramatta Road.</i></p> <p><i>b. Provide a new east-west link on Nestor Lane to connect Carrington Street, Old Canterbury Road and Brown Street and improve east-west access to the GreenWay.</i></p> <p><i>c. Break up long blocks between Tebbutt Street and George Street to provide high quality pedestrian-prioritised links that improve permeability and create a connected network of open spaces, linkages and connections.</i></p> <p><i>d. Prioritise Lords Road, Tebbutt Street north of Parramatta Road and Carrington Street for pedestrians.</i></p>	<p>A - Refer to the previous comments (Section 3.4 Open Space &amp; Public Domain).</p> <p>a - N/A</p> <p>b – Comply - The development introduces a secondary link to the GreenWay corridor and a new central court garden space.</p> <p>c – N/A</p> <p>d – Comply - Roof top communal open spaces are proposed. However, the total communal open space is less than ADG recommendations.</p> <p>B – See below</p> <p>a – N/A</p> <p>b – N/A</p> <p>c – N/A</p> <p>d – Non-compliance – Setbacks along Lords Road are to be provided. The Proponent has not provided sufficient details on proposed upgrades to the Lords Road frontage/ verge in terms of new landscaping and footpaths.</p>

Chapter No.	Section	Guideline	Comment
		<p>e. Strengthen the distinct laneway character of George Street and Upward Street, while also improving safety and amenity.</p> <p>f. Promote Flood Street as the one of the primary pedestrian and cycle connections, between Petersham Park and Lewisham Station to the south, and MarketPlace Leichhardt to the north.</p> <p>g. Improve the pedestrian amenity on Parramatta Road to achieve a high pedestrian activity area.</p> <p>C. Public Domain Requirements</p> <p>a. Refer to Corridor wide Guidelines at Section 3.</p> <p>b. Street trees along should be protected and enhanced.</p>	<p>e – N/A</p> <p>f – N/A</p> <p>g – N/A</p> <p>C – See below</p> <p>a – see Section 3 comments.</p> <p>b – Non-compliance - The Proponent proposes to remove the existing trees along Davies Lanes and replace them with new trees. Council's landscape architect to further review and comments on this matter.</p>
	10.6 Street Function and Precinct Transport	-	N/A
	10.7 Fine Grain	a Demonstrate consistency with the objectives and key guidelines for the relevant character area as set out in the Parramatta Road Corridor Fine Grain Study, September 2016. Character areas are shown in Figure 10.12.	Refer to the previous comments (Section 4.1 Block Configuration and Site Planning)
	10.8 Green Edge Setbacks, Transitions and Activity and Commercial Zones	<p>A. Setback and Transition Requirements</p> <p>a. Green Edge setbacks are to be provided in the locations illustrated in Figure 10.13.</p> <p>b. Maintain and reinforce a zero lot setback to Parramatta Road east of Hawthorne Canal. A zero lot setback is not required where an Indicative Zone for Rapid Transit is identified.</p> <p>c. Demonstrate consistency with the typical section for Parramatta Road illustrated in Figure 10.16.</p> <p>d. Reinstate the zero lot setback to Tebbutt Street through all new development. Setbacks should only be provided at the intersection of Tebbutt Street and Parramatta Road to amplify the prominence of Precincts entry.</p> <p>e. Upper level setbacks may be provided on deep blocks on Parramatta Road, Tebbutt Street and elsewhere throughout the Precinct so long as the predominant 2-3 storey street wall is preserved in the location identified by the Parramatta Road Corridor Fine Grain Study, September 2016.</p> <p>f. Provide setbacks consistent with Section 4 of the Guidelines in all other areas of the Precinct and Frame Area.</p> <p>g. Provide a built form transition consistent with Figure 10.14 to edge of Precinct.</p> <p>h. Provide a built form transition consistent with Figure 10.15 to heritage items</p>	<p>A - Refer to the previous comments (Section 4.1 Block Configuration and Site Planning, Section 4.3 Setbacks and Street Frontage Heights and Section 4.6 Active and Commercial Frontages).</p> <p>a – N/A</p> <p>b - N/A</p> <p>c - N/A</p> <p>d - N/A</p> <p>e - N/A</p> <p>f - N/A</p> <p>g - Refer to the Peer Review Report.</p> <p>h – Comply - The site adjoins Lambert Park which includes the Local Heritage listed house at 20-22 Foster</p>

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		<p><i>and heritage conservation areas.</i></p> <p><i>B. Active Zone Requirements</i></p> <p><i>a. Active and Commercial Frontages are to be provided in the locations illustrated in Figure 10.13.</i></p> <p><i>b. At least the ground floor level of development along the full length of Parramatta Road must be provided as a non-residential use.</i></p> <p><i>c. New Through Site Links and Prioritised Pedestrian Links should be lined with Active Frontages.</i></p> <p><i>d. An Active Frontage may only be replaced by the addition of new public open space, urban plaza or addition of new east-west connections.</i></p> <p><i>e. Active and Commercial Frontages must also consider the objectives and key guidelines set out in the Parramatta Road Corridor Fine Grain Study, September 2016.</i></p> <p><i>f. The ground floor level of Active and Commercial Frontages is to match the street level.</i></p> <p><i>g. Provide consistent paving, street furniture, signage, planting and lighting along Active and Commercial Frontages.</i></p>	<p>Street, Leichhardt at the southeast corner of Lambert Park. The proposal provides a 4-storey streetwall height and 6m setback to the common boundary.</p> <p>B - N/A. The site is not subject to active frontage or commercial frontage recommended in the PRCUTS.</p> <p>a - N/A</p> <p>b - N/A</p> <p>c – Non-compliance – landscape plans indicate no active frontages along the proposed east-west link.</p> <p>d - N/A</p> <p>e - N/A</p> <p>f – Comply</p> <p>g – N/A - To be addressed at detailed design stage.</p>
	10.9 Recommended Planning Controls	-	Refer to the Peer Review Report for detailed comments.