

Monday, 18 June 2012

The Director General
Department of Planning & Infrastructure
23-33 Bridge Street
Sydney NSW 2000

Architecture
Urban Design
Planning
Interior Architecture

Attention: Megan Fu,
Planner, Metropolitan and Regional Projects North

**RE: 1-11 Australia Avenue, Sydney Olympic Park, Ref: MP10_0027 MOD 1
Response to SOPA letter of 12. June 2012**

Dear Megan,

We write on behalf of the Proponent, Site 3 Development Company Pty Ltd in response to your request for a written response to the letter of Sydney Olympic Park Authority dated 12 June 2012. We note that SOPA do not raise objection to the proposal provided the matters raised in the letter are satisfactorily addressed. The following table provides SOPA's comments and the Proponent response:

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SOPA comment	Proponent response
1. Actual scale of modifications <i>It is noted that the modifications only relate to Stage 2 (Tower 1). It is reasonably assumed that there will be similar modifications to Stage 3 (Tower 2). With that in mind, rather than proposing any modifications in increments, the proponent should disclose the intentions for Stage 3 (Tower 2) so that the cumulative impacts of the modified development can be appropriately assessed and addressed.</i>	<p>The Proponent commits to maintaining the unit mix in Stage 3 (Tower 2) as approved in Major Project MP10_0027.</p>
2. Apartment mix <i>The following issues should be noted in relation to unit mix:</i> <ul style="list-style-type: none"> Unit mix has been continuously altered since Stage 1, with a prospective reduction in larger units. The number of 3+ units has dropped from 13% to 9% (MP 2030 sets a minimum of 15%). There is a significant increase in 1B units, which are unsuitable for families and/or similar demographics. 	<p>The following comments are provided in response to the SOPA's comments on unit mix:</p> <ul style="list-style-type: none"> The Proponent commits to maintaining the unit mix in Tower 2 (Stage 3) unchanged; The proposed unit mix with a higher proportion of 1 and 2 bedroom units reflects the current and growing demand for smaller more affordable units across the Sydney region that are well located for young people and empty nesters.

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SOPA comment	Proponent response
<p><i>Some of the 1B units are designated as adaptable units, but appear to be studio units (as bedroom is connected to the living area).</i></p> <ul style="list-style-type: none"> ▪ <i>If adaptable units are intended to provide accessible living conditions, then a 1B unit provides little flexibility if carer accommodation is required.</i> ▪ <i>There is a reduction in variety of unit options with the removal of all but 1 loft unit. The proponents have indicated that they wish to include more 1B unit due to market demands, which in real terms is reasonable. However, due to the size and strategic location of the development, it is important the Department consider the overall cumulative impacts of non-compliance with the Master Plan. This may in the future preclude families or any other similar groups from residing at Sydney Olympic Park.</i> 	<p>These prospective buyers are looking for the lifestyle and amenities that Sydney Olympic Park offers;</p> <ul style="list-style-type: none"> ▪ The Proponent advises that large 3 and 4 bedroom units in Stage 1 (Tower A/B) have taken 3 years to sell. 3 and 4 bedroom units in Stage 2 are having the same difficulty despite expending over \$500,000 in marketing costs to promote this product; ▪ The larger apartments in the development do not offer the differentiation in price from a 3 or 4 bedroom houses and town houses in nearby suburbs such as Newington; ▪ Large 3 and 4 bedroom units are more popular amongst families looking to live in a unit in smaller scaled apartment developments; ▪ Attachment A demonstrates the proposed modified units which are in adaptable unit configurations pre and post adaptation. The 1 bedroom unit design is to be adapted and reconfigured for necessary wheelchair turning space at the end of the bed, with a sliding door. The sliding doors isolate the bedroom from the living room. Morris Goding Accessibility Consultants have reviewed these plans and confirm that this is acceptable adaptation under Australian Standard AS 4299. Refer to revised Access Review report at Attachment B; and ▪ Two level or 'loft' units are unpopular in large scale tower developments. Generally, people prefer to live in single level apartments in suburban centres such as Sydney Olympic Park. Evidence of this was in the nearby Rhodes West, where units in recent developments are almost all single level.
<p>3. Balconies</p> <p><i>The change in unit mix has resulted in new triangular balconies that are less than 2m² in area and almost unusable. It is recommended that the additional FSR achieved through internal efficiencies (52m² in total according to the proponent) be invested back into providing balconies of greater than 2m².</i></p>	<p>The balconies referred to by SOPA appear to be those at Levels 12, 19-21, 22 and 23 which are secondary balconies located off a bedroom. Useable balconies are provided to units off- a living room in accordance with SEPP 65 and the NSW Residential Flat Design Code 2030 and the Sydney Olympic Park Master Plan 2030.</p> <p>Clause 4.6.17 (11) of the SOP Master Plan 2030 states that the:</p>

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	<p><i>"11. Secondary balconies are encouraged as service areas, to alleviate uses dependent on the primary balcony and to increase connection between inside and outside".</i></p> <p>The NSW RFDC 2002 states in relation to secondary balconies that:</p> <p><i>"Consider secondary balconies, including Juliet balconies or operable walls with balustrades, for additional amenity and choice:</i></p> <ul style="list-style-type: none"> ▪ <i>In larger apartments;</i> ▪ <i>Adjacent to bedrooms;</i> ▪ <i>For clothes drying, site balconies off laundries or bathrooms; they should be creased from the public domain".</i> <p>It is appropriate to provide smaller secondary balconies off bedrooms in the proposed development to free up space on the larger primary balconies for a table and chairs and general use. Secondary balconies are often useful as a place to put running runs to air or a clothes rack.</p>
<p>4. Natural ventilation</p> <p><i>The natural ventilation explanation on page 31 of the Architectus report provides identical performance specifications for both Towers. It appears that Tower 2 will have a different apartment mix to Tower 1, therefore generating a different performance specification. It is recommended that the proponents provide further cross ventilation information for each Tower based on definite apartment configurations.</i></p>	<p>The natural ventilation performance of each tower is as follows:</p> <ul style="list-style-type: none"> ▪ Tower 1 (Stage 2): 71.3% ▪ Tower 2 (Stage 3): 61.0% ▪ Combined: 66.6% <p>Compliance with the NSW Residential Flat Design Code natural cross ventilation requirement was assessed as a combined development in the Major Project MP 10_0027. It is reasonable to apply the same assessment methodology to this Section 75 Modification application.</p> <p>Assessed separately, the towers also comply with the minimum 60% natural cross ventilation performance requirement.</p> <p>Refer to the natural cross ventilation schedule at Attachment C.</p>
<p>5. Urban Design</p> <p><i>The tower is of significant mass and height and will have a major impact on the SOP skyline. The original 'Design Competition' winning design is based on a simple elliptical form that has been cleverly modelled to reduce the impact of its scale. The proposed changes will make the building appear more</i></p>	<p>The overall mass of the building will appear very similar to the approved development. Changes proposed to the glazing line and to the depths of balconies will appear only slightly different when views from the public domain. The external appearance of the building will appear very similar to that which was approved.</p>

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<p><i>solid, in particular:</i></p> <ul style="list-style-type: none"> ▪ <i>Smaller, shallower balconies and fewer external wall surfaces set back from the building edge are less effective in counteracting the mass of these large elevations.</i> ▪ <i>Removal of 2-storey loft units reduces the variety and changes the proportion of the upper levels. The removal of the loft units also means that there is less light penetrating through the 2-storey voids into the Level 23 living area.</i> ▪ <i>Infilling the void areas at each of Level 24 reduces the variety, transparency, and solar access to the upper levels.</i> 	<p>The removal of loft units will not have a significant effect on the building's external articulation and fenestration, given these the facades surrounding these units have a glazed 'skin' with external sun shading that is not proposed to change.</p> <p>Balconies introduced at Level 24 in place of voids will provide depth to the facade articulation as well as transparency in a similar way to the voids.</p> <p>In terms of light penetration into the Level 23 apartments, this is true that the replacement of the voids with balconies means less light to Level 23. The proposed development overall compiles with the requirements for direct solar access to living rooms and private open space in accordance with the rules of thumb under SEPP 65 and the RDFC.</p> <p>The solar access report prepared by Windtech and submitted with the Section 75W modification application at Appendix D of the Environmental Assessment shows that a great majority of units on both Level 23 and 24 will have excellent solar amenity (regardless of voids).</p>
<p>6. Access</p> <p><i>The Access Review report by Morris-Goding is inconsistent and incorrect in its referencing of the Authority's Access Guidelines. The most current version of the Guidelines is May 2011. The report will need to be reviewed and amended in accordance with this most current version.</i></p>	<p>Morris Goding Accessibility Consultants have reviewed the proposed modifications to the approved development and provide an updated report addressed the current Third Edition of the SOPA Access Guidelines dated May 2011. Refer to Attachment B.</p>
<p>7. Affordable housing</p> <p><i>Any modifications (increase in the number of units) will need to comply with affordable housing requirement of Master Plan 2030.</i></p>	<p>The Proponent has an agreement with SOPA to provide 3 % of units for affordable housing. This equates to 19 of the proposed 607 units in this modification application across Stages 2 and 3. The Project Approval is requires 18 affordable housing units to be provided to SOPA. SOPA will gain 1 additional affordable housing unit as a result of the proposed 75W modification.</p>

Conclusion

We trust our response provides the necessary information you require to determine the Section 75W Modification Application. If you require any further information in order to determine the proposed modification application, or if you have any queries regarding our response please do not hesitate to contact the undersigned on 8252 8400.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Murray Donaldson', with a stylized flourish at the end.

Murray Donaldson
Associate Director and Urban Planner
Architectus Group Pty Ltd

cc. Bassam Aflak, Site 3 Development Company Pty Ltd

Attachments

- A Adaptable Unit Layouts prepared by Bates Smart
- B Revised Access Review prepared by Morris-Goding Accessibility Consultants
- C. Natural Cross ventilation schedule prepared by Bates Smart

Attachment A

Adaptable Unit Layouts prepared by Bates Smart

Attachment B

Revised Access Review prepared by Morris-Goding Accessibility Consultants

Attachment C

Natural Cross ventilation schedule prepared by Bates Smart