



Design + Sustainability Advisory Panel Meeting Report – Date 28 November 2024

## **ITEM 3 – DA2024 1303 – 22 Melwood Avenue FORESTVILLE**

### **PANEL COMMENT AND RECOMMENDATIONS**

#### ***General***

The site was the subject to Pre-lodgement Meeting PLM2022/0218, held on 17 January 2023 with amendments made after being presented to the DSAP on 8 December 2022.

This proposal included:

- demolition of the existing Forestville RSL and the construction of a new two-storey RSL building located on the southern side of the site
- construction of two separate three-storey buildings containing a total of 40 in-fill self-care seniors housing units located on the northern side of the site
- two separate basement carparks to service the development. 192 car parking spaces including 12 accessible spaces were proposed for the RSL building, while 46 residential spaces and 7 visitor spaces (total of 53 spaces) were proposed for the seniors housing component.

The total floor space ratio (FSR) for this proposal was 0.7:1.

Throughout the DSAP Report, the panel had raised a number of concerns in relation to:

- the bulk and scale of the seniors housing components and their relationship with adjoining low density residential development surrounding the site
- concerns in relation to the massing of the RSL building and suggested a redesign based on breaking down the mass and potentially introducing courtyards into the building.

The PLM minutes noted:

“Despite improvements to the original design there are still outstanding critical issues with the amended proposal in terms of the excessive density, height, bulk and mass, as represented with a breach of the 0.5:1 FSR SEPP Seniors requirement (0.7:1 proposed). The proposal fails to meet the Design Principles of the SEPP which requires the development to respond to the desirable elements of the area’s current R2 Low density character, particularly to the east...”

It also noted issues with servicing the RSL and the excessive number of driveways to Melwood Avenue.

The Panel notes that any non-compliance with planning controls can only be considered where there is:

- a demonstrable improvement in amenity within the proposal, (overshadowing, privacy, access to rooftop open space etc.)
- reduced impact on adjoining sites (either existing or in relation to future development potential)
- contributions to the public domain or other public benefits (affordability, environmental performance)

In order to demonstrate the benefits of non-compliance the non-compliant proposal should be benchmarked and compared to a complying ‘reference scheme’, which has not been done.

The key differences between the development proposed in the previous PLM and this development are as follows:

- The RSL building is now a three-storey mixed-use building that accommodates two-storeys of seniors housing apartments above a single-storey RSL building instead of a two-storey RSL building with no seniors housing above the RSL.



- The remaining seniors housing apartments have been distributed across three buildings rather than two buildings.

The FSR of the development is 1:1 (9,009m<sup>2</sup>), with 0.75:1 (6,745m<sup>2</sup>) allocated to the seniors housing component and 0.25:1 (2,263m<sup>2</sup>) allocated to the RSL building. The height, bulk and scale of the development in the Development Application is greater than that proposed under PLM2022/0218.

### ***Strategic context, urban context: surrounding area character***

As noted in the introduction, there are many fundamental issues still present from previous scheme.

The suggested development is located on a site that has been entirely utilised by the local RSL for an extended period, leaving minimal space for vegetation or deep soil landscaping. The current proposal continues this approach, is very defensive to the south and west and looks inwards not opening itself to the community. The legibility and accessibility of the access ways through the site are not good. The development represents a substantial intensification of use on the site. It is therefore important to ensure that a mutually-respectful relationship to surrounding development is achieved (in terms of building scale, landscape and visual amenity/privacy). The Panel is not convinced that this has been achieved.

The redevelopment offers an opportunity to continue to provide social places for the community while delivering quality housing. This could be achieved with a better layout that enables community connections along with substantial planting initiatives, establishing green corridors with a variety of canopy trees that contribute to efforts against climate change while providing much needed habitat for local fauna.

### **Recommendations**

A redesign is required. Consider the following ideas to shape the planning:

1. Ensure required setbacks are achieved on all sides with lots of appropriate landscaping to enrich the residents' amenity and biodiversity.
2. Consider separation of the club and residential uses so the club occupies the south part of the site only while the residential can sit on the land to the north, opening up to the east, north and west.
3. Consider a smaller footprint for the club that extends over 2 stories, with more space to the north for a landscaped pathway and activity zones as noted below
4. Consider 3 - 4 buildings for the residential area, stepping down to 2 storeys on all boundaries to better integrate with the neighbouring sites.
5. Include a landscaped pathway from Melwood Avenue to Forestville Avenue that will:
  - a. Connect Melwood Avenue with the community buildings and parks to the west and Forestville Avenue
  - b. Separate the club and the residences, enabling clear entries and control of access to each area
  - c. Locate the activity zones for the residences off this path, providing easy access without conflict to the residents private areas
6. Open up views and access of the club to the southern fields by locating kiosk, external gaming and other access on the southern side of the building.

### ***Scale, built form and articulation***

The non-compliance with bulk, height, and FSR requires the scale, built form and articulation to be further reduced and improved.

The incorporation of apartments over the club building leads to many conflicting issues of privacy and access. The greater heights of the club's rooms exacerbate the non-compliance of this building with heights and setbacks.



The internal arrangement and location of apartments are not well informed by the ADG, while some do not comply at all. Of particular concern is the several units whose main outlook is into an internal courtyard.

The legibility of access is compounded by locating lifts deep within the carpark, club and residential areas with complex system of pathways linking them. While the current arrangement is a little clearer than before, there is still much room for improvement especially for seniors housing.

### **Recommendations**

7. Consider removal of all residential apartments from the Club building and redesign as a more compact, well-articulated 2 storey high building that opens up to the public space to its east, south and west.
8. As noted above, consider 3 - 4 buildings for the residential area, stepping down to 2 storeys on all boundaries to better integrate with the neighbouring sites.
9. Ensure the scale, built form and articulation of the residential apartments are informed by ADG compliant approaches to amenity and privacy for the apartment spaces.

### ***Access, vehicular movement and car parking***

While the combining of the carparking for the Club and residences has enabled the removal of one of the driveway crossings, the confusion and access issues that will arise are highly problematic.

Additionally, the substantial hard paving for the drop off area in front of the club at the exclusion of the required landscaping needs to be reconsidered.

As noted in the first section, the legibility, accessibility and safety of the pedestrian access throughout the site needs considerable improvement.

There does not appear to be any facilities for the secure storage of E-bikes or other bikes, which could encourage and support usage by visitors to the club in the future.

### **Recommendations**

10. Re-consider the overall site planning as noted in the first recommendation so that it is informed by strong and legible pedestrian access, with vehicles working around this.
11. Re-consider the access to the basement carparks so that it is more central and does not require the residents to drive through the club basement
12. Consider redesigning the set down area for the club so it sits behind the landscaping in the set back from the street. Less parking spaces at this level could assist in reducing the hard paved area.
13. Reduce the amount of carparking so only as much as is needed is included. Include secure bike parking facilities.

### ***Landscape***

The landscape proposals indicate that the development is situated within a bushland environment that aims to enhance tree canopies and preserve landscape corridors. However, the suggested canopy landscaping consists mainly of a planting bed along the western boundary, a limited number of trees sparsely distributed around the remaining perimeter, and only a few small trees located in the front setback.

There needs to be more emphasis on the natural environment and blending the built form into the bushland setting that is characteristic of the area.

The proposal is an overdevelopment of the site and a scaled back proposal should be considered that provides adequate usage areas that are located away from residential units and are equally accessible by all of the residents.



## Recommendations

14. Consideration should be given to canopy planting at different levels with trees that will attain a variety of heights to help with the visual intrusion of such a large development in an otherwise residential area.
15. Multiple garden beds should be located around the entire perimeter to assist with visual and audible privacy between neighbouring properties and to begin to provide green corridors as suggested in the submitted landscape documentation.
16. The service entry and drive along nearly the entire length of the southern boundary is excessive and the row of tree planting located on the Council verge should be located within the property.
17. The basement car park intrudes into the required setback area of 6 metres and needs to be redesigned to lie outside this area to allow for proper root development for large tree planting.
18. The proposed synthetic turf areas should be replaced with a rubber soft fall (made from recycled material) in a light colour to ensure does not become too hot in the summer sun.
19. The child play area with soft fall is located directly adjacent to a 3-bedroom unit with views into the bedrooms and living rooms. This play area should be located within the RSL site adjacent to a passive observation area for parents.
20. The community gardens are also located directly adjacent to a 3-bedroom unit with views into the bedrooms and living rooms. This area should be located in a Communal Open Space area where gatherings are encouraged.
21. The entry area and dedicated carparking along Melwood Avenue is excessive and proposes far too much hardscape elements and should be reconsidered. This area presents a good opportunity to create a unique garden bed design that pays homage to those who have served Australia in the armed forces.
22. A plan clearly showing the required setbacks on all sides along with the calculations of deep soil, landscaped area and communal open space should be provided by the Landscape consultant for assessment by Council.

## Amenity

Refer to the Apartment Design Guide and the Seniors Housing Design Guide 2023 for guidance.

The development does not comply with the building separation requirements entailed within the ADG, specifically the 12m internal separation requirements between the various buildings and the 9m separation requirement from the northern boundary. The non-compliances would result in unacceptable overlooking between apartments internally within the site and towards the adjoining low density residential development to the north of the site and may result in adverse acoustical privacy impacts.

Additionally, the use of light wells as a primary source of natural ventilation is not permitted by the ADG and as a result the proposal's provision of naturally cross ventilated apartments is not accurate.

On a site of this size, there does not seem to be any reasonable justification to vary the separation requirements (let alone any requirements) within the ADG.

## Recommendations

23. Redesign to include required setbacks which include landscaping as noted above.
24. Ensure all residences have private open space opening to the east, west and north boundaries and enabling:
  - a. More than 2 hours sunlight to the living areas in mid-winter.
  - b. Natural ventilation sourced from open landscaped areas
25. Consider a variety of residence sizes and possibly smaller areas to increase the mix available and help address issues noted above.



## ***Façade treatment/Aesthetics***

The proposal is simple and restrained and reasonably well-articulated. Similar principles should be engaged in the redesigned scheme.

Care should be taken in the use of rendered surfaces and how these light-coloured materials will stand up to wear and tear over the years. Consider materials such as bricks which have greater durability.

### **Recommendations**

26. Maintain a similar approach in redesign.
27. Investigate suitability of materials for durability over time, and consider maintenance

## ***Sustainability***

With the regulatory environment changing now – for efficiency, electrification, zero emissions and mandatory disclosure – investments in these issues at this time will be worthwhile both for the club, future residents and the club's reputation and community standing. Additionally, residential accommodation for seniors, who generally spend more time at home, should be aiming for greater natural comfort for both health and cost of living reasons.

As the grid is decarbonised the importance of embodied carbon is finally being realised in Australia. The SEPP for Sustainable Buildings and NABERS are both starting the journey of requiring calculations around this carbon that is realised up front at the beginning of projects. Targets to address this large amount will be set soon. While this is not required now, design excellence is never driven by what is required – it helps set the direction. Leading designers are now showcasing how to embrace this positively.

Please note that BASIX thermal performance standards that commenced on 1 October 2023 require an average 7 stars NatHERS, with no unit below 6 stars. This is consistent with the National Construction Code for 2022. It is noted that there are at least 7 apartments that do not achieve 6 stars NatHERS, and it is not clear what the average is.

The Panel commends the all electric approach to the residential accommodation. It is unclear as to whether this will be implemented in the RSL Club as well. This is strongly recommended.

### **Recommendations**

The following aspects of design and servicing can be easily and cost effectively considered for inclusion:

1. Decarbonisation of energy supply
  - All services to both the RSL Club and residences should be electric – avoid gas for cooking, hot water and heating. For information on why this is so important for cooking, see <https://cooksafecoalition.org/>.
  - Efficient heat pump systems for providing electric hot water should be considered for both the RSL Club and residences. Ensure there is adequate space for their proper ventilation.
  - The storage of hot water can be considered a de facto battery if heated by PVs during the day.
  - On site battery storage has benefits for the grid and may be a highly desirable back-up during the transition to a de-carbonised grid
  - Unshaded roof space is a valuable resource for PV installations, sized to suit the demand and roof space. Their efficacy can be greatly enhanced when placed over a green roof, which has additional ecological benefits.
2. Provide EV charging points (Min 15 amp) to suit level 1 charging in carparking.
3. Passive design and thermal performance of building fabric
  - Ensure that all apartments achieve at least 6 stars NatHERS, with an overall average of 7 stars. This should be achieved by engaging in a fabric first approach to ensuring amount of energy required for heating and cooling can be kept to a minimum. This can be enhanced with



appropriate orientation, smart built form, good insulation and sealing, well designed natural ventilation, external shading devices and appropriate planting.

- Consider investing in higher than the minimum NatHERS and Section J requirements in preparation for the changing climate we are experiencing.
  - The inclusion of ceiling fans to all rooms will provide comfort with minimal energy while reducing the need and energy required for air-conditioning.
4. Water use minimisation
- The 5,000 litre water tank to harvest rainwater from roofs seems inadequate for a site this size, even if it is only to be used for landscaping. Ideally this would be larger and connected to the toilets to maximise reuse. This will also reduce the size of tank required because the water will be used constantly.
  - All fixtures and appliances should be water efficient – more than the 3 stars indicated in the BASIX certificate.
5. Materials
- A new area of NABERS and BASIX, consider the following approaches to reducing the embodied carbon of the project:
    - Retaining and reusing existing buildings and/or materials in the design.
    - Simplified structures and reduced spans to reduce the amount of steel reinforcement and concrete required
    - Keeping small and optimising the quantity and quality of space required
    - Dematerialising wherever possible (e.g. bare concrete floors, reduced tiling etc)
    - Designing for long life for the overall building and how to address different time frames for structure, envelope, services, fitouts etc.
    - Consideration of using biogenic materials such as timber for structure
    - Using low embodied carbon concrete, recycled steel and recycled materials wherever possible
6. Education
- Public buildings like this are a great opportunity for providing information about the sustainability features of the building. Signage could be used to explain the history, materials reuse, water recycling, solar power and energy balance, natural ventilation etc.

## PANEL CONCLUSION

**The Panel does not support the proposal in its current form. A complete redesign to address the recommendations noted above is required. As noted, any breaching of the controls would need to be supported by an analysis of the benefits compared to a complying scheme.**

The Panel refer the applicant to the Apartment Design Guide for aspects related to amenity and internal planning of apartments.