

PO BOX 336
28 Malton Rd,
Beecroft,
NSW 2119
ACN: 110 787 276

Phone: (02) 9481 8341
Fax: (02) 9481 8341
E-mail: gm83380@bigpond.net.au
Mob: 0407 007 444
ABN: 33 729 179 075

**GMURBAN DESIGN
& ARCHITECTURE**

Att: Ms Danielle Dickson

**Wyong Shire Council
PO Box 20
Wyong
NSW 2259**

5 October 2006

Dear Danielle

**Re: Further Urban Design Assessment for Development Application No 2660/2004
The Entrance Resort
The Entrance Road West, The Entrance**

Attached please find the final report for the amended proposal as discussed for the above project. I have assessed the overall design merit of the proposal being mindful of councils controls and the principles of SEPP 65. Given that the previous recommendations still stand and that the applicant has chosen not to adopt the suggested changes I have not repeated them in this report.

If you have any further queries please do not hesitate to contact me on 0407 007 444.

Your Sincerely



Gabrielle Morrish
Director
GM Urban Design & Architecture Pty Ltd

**Further Urban Design Review for the amended
proposal for
The Entrance Resort
The Entrance Road West,
The Entrance.**

September 2006

Further Urban Design Review The Entrance Resort, The Entrance Rd West, The Entrance.

Executive Summary

Since the previous assessment the proposal has changed very little. The building separation has been increased marginally but still does not fully comply with the design code (subject to viewing plans with windows shown clearly).

The design standard of the development in terms of its massing, open space, connectivity, sense of address and architectural expression is still considered to be poor. Therefore the development is still not responding appropriately to:

- Preservation and continuation of the historic and existing street pattern via maintenance and improvement of Oakland Ave.
- Connectivity and view corridors through the sites from north to south
- Grain in building form , reinforcement of the street edge.
- Location of primary open space area for the residential.
- Minimise the overshadowing of private and communal open spaces or consolidation of space to a central and more useable area.
- Lack of street address for the residential and lack of a clear public addresses.
- Appropriate scale relationship to the western boundary.
- Separation between buildings and privacy.
- Natural ventilation to kitchens
- Storage within apartments.
- Pedestrian connection to any future car park along Manning Street through the site to the water front.
- General legibility within the development particularly for the public.
- Direct access and entry for ground floor apartments
- Courtyards for private open space to ground floor apartments.
- General architectural treatment and articulation.
- Energy efficiency initiatives.

Further Urban Design Review for The Entrance Resort.

September 2005

Introduction

GMU has been asked by Wyong Council to carry out an urban design assessment of the above development application. This follows advice given to Council earlier this year and also an Urban Design Review prepared in April 2005.

This further urban design assessment is based on the following information:

- Thrum Architects P/L DA Architectural drawings dated 9/9/05, 9/8/06 and 21/8/06 numbered
 - DA.001/01-09, DA001/01-06, DA001/11-15 and DA002/01-14
- Ingham Planning Pty Limited letter to WSC dated 8/8/06
- Thrum Architects P/L information comprising:
 - Letter to WSC dated 8/8/06 with solar data, shadow elevations, environmental analysis, shadow plans, annexure 5 apartment types
 - Letter to WSC dated 10/10/05
 - Letter to WSC dated 31/3/06
 - Amended DCP 64 Multiple Dwelling Residential
 - Disc of Thrum Architects P/L with DA drawings same as item 1 above.

Documents for the April 2005 report comprised:

- Statement of Environmental Effects—By Ingham Planning, November 2004
- Architectural Drawings numbered—DA 000/01-08, DA 001/01-15, DA 002/01-14
- Landscape drawing —LMP-101
- Precinct Plans LDA 101-104
- Design sketches LDA 201-204
- Heritage impact statement by City Plan Heritage, November 2004
- Traffic report by Colston Budd Hunt & Kafes, November 2004

This report is a further review of the proposed development on its urban design merits, being mindful of the statutory controls which apply to the site, SEPPs 71 & 65 and good urban design practice. The relevant statutory controls which affect the urban design outcome for the site are as follows:

- State Environmental Planning Policy No 65
- State Environmental Planning Policy No 71
- Coastal Design Guidelines for NSW, February 2003
- Wyong Local Environmental Plan 1991
- Development Control Plan 60 – The Entrance, January 2001
- DCP 64 – Guidelines to Medium and High Density Residential Development, January 2006.
- DCP 61—Car Parking
- DCP 14—Tree Management
- DCP 76—Conservation of the Built Environment

Summary of Council's requirements

The site is zoned 2 (g) Residential Tourist Zone & 6 (a) Open Space & Recreational Zone under the LEP. The site is located within Precinct 1. Its objectives are primarily tourist related. The site has been identified under the LEP as suitable for Managed Resort Facilities. The uses of these sites are considered appropriate for major tourist, retail and residential development. The LEP further states that the Entrance Road is to be 'integrated with adjoining development and street front activities

**Further Urban Design Review cont.
The Entrance Resort, The Entrance Rd West, The Entrance.**

The LEP states that Council may consent to 75% of the proposed resort accommodation being used for permanent residency i.e. residential apartments within a managed resort facility (refer p.37, DCP 60). On this basis it would appear reasonable that the Residential Design Flat Code should be applied to 75% of the accommodation to ensure that it achieves an appropriate level of amenity.

DCP 64 does not apply to the site in terms of height. Zoning 2 (g) is not covered by the DCP 64 and therefore the heights required in DCP 60 will prevail. Other controls within DCP 64 though will be applicable such as required setbacks to achieve a high quality amenity, privacy and solar access.

DCP 60 is specific to the Entrance and prevails over DCP 64. The aims of the DCP are to ensure that development provides high level amenity for tourist related activity & accommodation. Any retail development is to be tourism focussed and the design must reduce potential conflict between permanent residents and tourist activities.

There are quite specific requirements for maximum building height and DCP 60 stresses that it should NOT be assumed that development is to fill envelopes encompassed by 12 and 24 metre height limits. (refer p.39 and p.40 DCP 60 Cl.5.5.2a. and Cl.5.5.3a))

It is considered essential that the main bulk of building should be set back approximately 20 metres from The Entrance Road frontage. (refer p.39 and p.40 DCP 60 Cl.5.5.2b and Cl 5.5.3b.) The Entrance Road is to be integrated with adjoining development & street front activities such as passive recreation activities, eateries and retail facilities.

Important elements include minimising overshadowing, the blocking of views and wind tunnelling effects created by tall buildings. There is specific and particular reference to future buildings south of Bent Street and their views over the site to the water to the north (refer p.40 DCP 60 Cl.5.5.2e.)

DCP 60 also requires the design of buildings to be high quality and for the maximisation of activity along street frontages. Development that fronts The Entrance Road, Wilfred Barrett Drive and Oakland Avenue must address these frontages as a 'front'. Development west of the bridge needs to provide improvements & landscape works within the road reserves and along the foreshore promenade. The visual impact & relationship of proposed development to adjoining and surrounding development must also be considered. All development is required to be energy efficient.

(refer p.19-20 DCP 60)

DCP 64 does not apply to the site in terms of height. Zoning 2 (g) is not covered by the DCP and therefore the heights required in DCP 60 will prevail. Other controls within DCP 64 though will be applicable such as required setbacks to achieve a high quality amenity, privacy and solar access. Detailed requirements are listed in Appendix A.

DCP 60 is specific to the Entrance and prevails over DCP 64. The aims of the DCP are to ensure that development provides high level amenity for tourist related activity & accommodation. Any retail development is to be tourism focussed and the design must reduce potential conflict between permanent residents and tourist activities.

There are quite specific requirements for development fronting the Entrance Road. It is to be integrated with adjoining development & street front activities such as passive recreation activities, eateries and retail facilities. Important elements include maintaining critical view corridors and accessibility.

DCP 60 also requires the design of buildings to be high quality and for the maximisation of street frontages. Development that fronts The Entrance Road, Wilfred Barrett Drive and Oakland Avenue must address these frontages as a 'front'. Development west of the bridge needs to provide improvements & landscape works within the road reserves and along the foreshore promenade. The visual impact & relationship of proposed development to adjoining and surrounding development must also be considered. All development is required to be energy efficient.

Assessment of the Proposal

Project Description

The project involves the demolition of all existing properties, with the exclusion of an existing heritage listed Thai restaurant building on the south-west corner of Oakland Avenue and The Entrance Road. The intention is to construct a Managed Resort facility including both permanent and tourist related accommodation, conference centre, retailing, eateries of varying size and type, a child care centre, indoor amusement facility and underground car parking.

The proposal includes the full or partial closure of 2 existing public roads being Oakland Ave and The Entrance Road with conversion of The Entrance Road into a pedestrianised space. The proposal also includes the creation and dedication of a new public road adjacent to the Wilfred Barrett Drive bridge supports.

**Further Urban Design Review cont.
The Entrance Resort, The Entrance Rd West, The Entrance.**

The topography of the land is relatively flat with exposure to north easterly views across the Entrance Channel. The main orientation of the site is north east. Existing landscape of the site and its setting are significant.

Applicant	Terrigal Grosvenor Lodge Pty Ltd.
Owner	Terrigal Grosvenor Lodge P/L, Ms M J Stevens (5 Oakland Avenue), NSW Fisheries (9 The Entrance Road West) and Wyong Shire Council (various road reserves)
Application No	2660/2004 Wyong Shire Council
Description of Land	<p>2 large parcels, the eastern site (13,855m²) and the western site (15,007m²), together with a small land parcel of 403m², (Part Lot 7 of DP 23196), located on the south west corner of Bent Street and Wilfred Barrett Drive and separated from the main development area. In addition, the parcel includes:</p> <ul style="list-style-type: none"> • Part of Oakland Avenue between Bent Street and The Entrance Road (1,723sqm approx) • Part of The Entrance Road extending 10 metres north of the northern boundaries of the subject allotments fronting The Entrance Road including the extension of the 10 metre line across the Oakland Avenue intersection. The area of this part of The Entrance Road is 2,850 sqm. Approx.) • Total area of the subject property is 33,838 square metres.
Proposed development	<ul style="list-style-type: none"> • A new public road adjacent to Wilfred Barrett Drive. • 254 residential apartments in 5 residential towers (8-9 storeys) and several lower rise residential and mixed use buildings up to 5 levels high on the western part of the site • 272 resort apartments in 3 tower buildings and several lower rise mixed use buildings on the eastern part of the site. • Entertainment piazza with adjacent entertainment/amusement precinct located on the concourse level on the eastern portion of the site fronting the foreshore plaza • Commercial/retail tenancies • Alterations and additions to the existing heritage listed Thai restaurant and its conversion to a tavern adjoining the winter garden plaza • Construction of a new foreshore plaza extending between the waterfront and the managed resort facility along the entire frontage of the site, connecting under the bridge to the east with the existing Entrance foreshore plaza. • Parking in two levels divided into public and private parking accessed from a roundabout in Oakland Avenue, 1 from Bent Street and 1 from Clifford Street. • Public road closure—part of the Entrance Road in front of the subject property and Oakland Avenue and the transfer of the land to the developer—which will be subject to a deferred commencement condition of consent. • The construction and dedication of the proposed new extension of Bent Street connecting the existing development on the eastern side of the bridge with the existing Bent Street will be subject to a condition of development consent.
Site Address	The Entrance Road West, The Entrance
Site Area	33,838 sqm
Zoning	2 g) Residential Tourist Zone & 6(a) Open Space & Recreational Zone
Development height	Varies from 4 storeys to 8 storeys.

There are stands of Norfolk Pines along the foreshore that provide a visual greening of the foreshore and also act as a windbreak. These trees play a part in the place making and character of this area and should be retained as should the existing vegetation on the site.

**Further Urban Design Review cont.
The Entrance Resort, The Entrance Rd West, The Entrance.**

The site effectively comprises a full and partial street block within the existing street pattern of this side of The Entrance. It currently contains various uses including a caravan park, detached dwellings, vacant land, Motel and restaurant.

Site Context

The site is located to the west of The Entrance CBD along the water front of Tuggerah Lake. It is the opposite side of the main approach bridge into the Entrance from the north (Wilfred Barrett Drive bridge) and currently benefits from a water front street and low scale development.

The development surrounding the site is mainly single and two storey dwelling houses of lightweight construction and some two storey tourist development. The water front has a number of small commercial enterprises along it including a bait shop and is regularly used by local residents for recreational pursuits such as fishing from the pier, walking and cycling.

The subject site also contains Oakland Ave. This is a public street and is a primary connector to the water front. The current street alignment is north south rising gently towards the south. On this side of The Entrance peninsular it is the only continuous street through to the lake front and the only one offering a water vista as its termination. All the other streets terminate at Manning Road. Therefore preservation of this view corridor is important as it provides the only visual link to the water in a north south direction.

It is also imperative to retain streets such as this within the public ownership of the council and for general public use. Otherwise there is a real risk of privatisation of the water front which is counter to the edicts of SEPP 71 and the Coastal Design Guidelines by UDAS and the Coastal Council.

The area is in transition due to the controls contained within DCP 60. The DCP encourages the redevelopment of this area due to its high amenity, given the lakeside location and proximity to the town centre. It should be noted though that this side of the peninsular is of lower scale than the eastern foreshore and does not benefit from the direct connection with the town centre.

Generally a height of 12m or 3-4 storeys is encouraged along the foreshore edge with greater height of either 24m (7—8 storeys) or 18 m (6 storeys) possible mid block. It is important to appreciate the scale of future development south of this area. Heights are 18m to the south east, 3 storeys to the mid south and south west and 2 storeys to the water front on the western foreshore.

Given the low topography and lake front position this site is highly visible from both the bridge and the opposite foreshore. Together with the Entrance town centre this area of the foreshore creates the 'northern gateway' into the Entrance. Therefore its massing, composition and architectural quality are an integral part of the arrival statement to this part of the Central Coast and has the potential to set a benchmark as an iconic development for the town.

General Assessment of the development against principles and provisions

Firstly it should be noted that:

- No further SEPP 65 report has been provided for the proposal as requested in the earlier assessment.

Zoning

- The development is permissible under the zoning.
- The proposal intends to absorb portions of two public roads which it is assumed are within the Council ownership. This is not supported.
- No development whether parking or any other use should be allowed on or ideally under the public road areas outside the site boundary—either Oakland or The Entrance Rd.
- This is public land and should be retained and protected within public ownership. The proposed land swap to provide the new street adjacent to the bridge is not supported. Given the size of the site the access point should be provided in exchange for closing any portion of The Entrance Rd.
- Loss of the two streets proposed will have a significant effect on the amenity and permeability of the area for other residents and will reduce the access to the water front for the current community. The new street proposed to compensate for this loss does not contribute to the access or amenity for the community to any significant degree.
- The information contained in the applicants further submission demonstrates that the design approach fails to

**Further Urban Design Review cont.
The Entrance Resort, The Entrance Rd West, The Entrance.**

comprehend current urban design thinking. The RFDC and Coastal Design Guidelines are all written to encourage simple logical and permeable street patterns with buildings edging streets and reinforcing existing street patterns.

- The proposal appears to be based on outdated thinking where buildings are located in 'green space' with no direct or clear address to any street or identity. Such an approach is a very poor outcome for the site.
- The applicants report further purports that it is councils intention to close Oakland Ave rather than the intention of the applicant. If this is the case then we strongly recommend that Council reconsiders this position and maintains Oakland Street in its current configuration.

Recommendation

- As per our previous report the privatisation of public streets for this development should not be supported.
- Partial closure of The Entrance Road adjacent to the resort component may be possible although ideally this would be as a shareway. Full closure of this street and Oakland Street should not be contemplated.

Height, bulk and scale (including setbacks)

- The development comprises effectively two portions—the eastern and western sites. The western site is the permanent residential area and the eastern site is the resort portion.
- The further information provided by the applicant appears to indicate that they have not understood that the basic planning approach put forward by their application is not supported and is considered to be contrary to current good design practice.
- The proposals still lacks legibility in terms of its circulation and way finding and its general massing and sense of address. The intention of closing the public road and privatizing this space is not supported with the hotel and resort massing closing off existing view corridors and public access. Further the pedestrian environment is impoverished by the proposal as the roundabout, Porte Cochere and parking access create a very busy point which will discourage pedestrian movement for existing residents of the area through the resort.
- Again this is privatisation of public land which is not supported as a fundamental principle.

Western site—residential

Height and setbacks

- The proposal is still for 5 x 8 storey residential towers towards the middle and south of the site. To the eastern and northern edges of the site are 4 storey buildings and the existing tavern which still has an attached building form of greater height adjacent to it.
- Whilst the development may comply literally with the height controls the design and distribution of the buildings still does not meet the objectives of SEPP 65 or of good urban design practice including achieving a high quality outcome as required by DCP 60. It still does not meet the requirements of the Coastal Design Guidelines under SEPP 71 as it purports to do within the SEE.
- The form is dominating and unrelieved, it offers no opportunities for view sharing across the site and results in a confusing scatter of buildings that still lack clarity in their address or disposition.
- The allowable height for Manning Street is 12m. The proposal suggests a 7.5m setback for much of the western sites southern boundary diminishing to 4.5m setback to the eastern end of the southern boundary.
- There is a drainage reserve of some 3m to the south of the site. Under the RFDC 8 storey development should provide 18m separation between habitable rooms or balconies. Reasonably each lot should contribute 50% to this dimension. Therefore reasonably 9m should be provided on this site from the centerline of the drainage corridor. Currently the proposal provides the required 9m and therefore is considered acceptable.
- The development also still proposes 8 storeys immediately adjacent to the western boundary. Whilst 24m is permissible as a maximum a more sensitive response is needed to this boundary.
- The adjoining development is limited to 12m. Again the same separation distances apply here as to the southern boundary based on the RDFC. The dimensions here are not dimensioned but based on the layout shown are unlikely to comply. Therefore to achieve both better amenity and height relationships the height of the building should be 4 storeys only along the western boundary.
- Such a large site should be providing an urban structure that provides permeability and allows public access and

**Further Urban Design Review cont.
The Entrance Resort, The Entrance Rd West, The Entrance.**

address particularly for the residential buildings. This still has not occurred within the development.

- It is also understood that apartment floor-to-ceiling heights generally are about 2.7 metres as required by the RFDC except for top-floor units which are only 2.4 metres. This is unacceptable notwithstanding the Architects reference to solar amenity of north facing units (refer p.2 Thrum letter to WSC 31/3/06) and is indicative of the nature of the overdevelopment of the site.

Building separation and interrelationship of apartments

- The applicants further submission states that distances between buildings have now been increased.
- However the separation distances still do not comply with the RFDC. As stated earlier habitable rooms and balconies in 8 storey development are to be 18m apart. On a site of this size there is no justification for not achieving the suggested separation distances—it is not a high rise urban location such as a city centre or major urban location.
- The distances between Poolside and Brentwood—both of which are 8 storeys for their full height relative to each other is only 12m—6m less than that recommended in the Code. With Clifford and Poolside the distance is only 13.13m rather than 18m. Each of these apartment buildings has habitable rooms and balconies facing each other across this space (although the plans submitted were unclear as to window locations).
- The two Wintergarden buildings are very close with balconies for the two inner units and bedrooms of the northern units in this building far too close to achieve privacy and reasonable amenity.
- Therefore given the current proposed layout of the site it is considered that this proposal is an overdevelopment of the site as appropriate transition, scale, setback and building separation is not being achieved.

Building bulk and massing

- The bulk of the building forms is still considerable due to the disposition of the individual buildings and the poor articulation of the massing. The overall design is not successful at reducing apparent bulk and does not meet the DCP requirements in terms of avoiding continuous horizontal alignments that exacerbate the apparent length and massing of buildings.
- The building forms are still angled relative to the boundary. In combination with the linked building massing the angled forms expose a considerable length of building mass to the various street elevations. The positioning of other building forms in any gaps between these buildings is further exacerbating the bulk of the development and effectively blocks any view lines through the development.

Eastern Resort

Height

- The Resort has 3 curved long building forms extending 8 storeys above street level and set around a sunken courtyard. Internally the height reads as 10 stories. These forms extend into 5 perimeter buildings that vary in height from 4 storeys to the north to 2 storeys to the south.
- The DCP requires the 24m height to occur setback 20m from the site boundary. The proponent has proposed a new street along the eastern boundary. This is a positive addition that will help address safety and amenity issues along this boundary and provide additional connectivity to the western side of the peninsular. However this additional street does not compensate for the closure of The Entrance Rd.
- The new street effectively creates a new boundary for the site. Ideally the required 20m setback should apply from the revised boundary line to ensure that a 12m height is achieved along the new street respecting human scale and avoiding a visual and wind canyon along the site. (Refer DCP 60 p.40 Cl.5.5.2c) It also then moves the massing more centrally in line with the DCP intent for height.
- The 8 storey height is considered acceptable to the centre of the site subject to issues of overshadowing of the public domain areas of the resort and of adjoining buildings.

Building separation and bulk

- The resort development presents as a very bulky building. It effectively creates an unbroken 8 storey mass to the entire eastern and southern boundaries of the site.
- This approach contravenes DCP 60's requirement to retain view opportunities for the land south of Bent Street which is also exacerbated by the closure and blocking of Oakland Ave. The massing also impacts on distance views

**Further Urban Design Review cont.
The Entrance Resort, The Entrance Rd West, The Entrance.**

for other buildings to the east. A more broken form would preserve view glimpses for these developments.

- There is also a lack of articulation in the roof forms which creates an unremitting horizontal top to all the buildings with exposed plant structure.
- The massing at greater than 4 storeys at the water front contradicts the recommendations in the SEPP 71 Design guidelines and the privatisation of a major view corridor street is directly against its recommendations.
- The form is dominating and unrelieved, it offers no opportunities for view sharing across the site and results in a confusing scatter of buildings that lack clarity in their address or disposition.
- The positioning of building forms still locks every opportunity for water glimpses across the site and is a poor outcome for all existing residents and development to the rear of this site.

Recommendation:

Western site—Residential

- The development should be set back further from the western boundary to give a better potential relationship to any development that occurs on the adjoining lot. Otherwise the height of the two forms along the western boundary should be reduced to a maximum of 4 storeys.
- The separation between buildings and apartments is still generally unacceptable and should be increased to meet the suggested separations within the Design Code.
- The overdevelopment of the site should be addressed by considering an alternative layout to achieve improved building and public private relationships.
- The buildings should be positioned and designed to reduce apparent bulk with clear uninterrupted view lines through the development to reduce its massing.

Eastern Site—Resort

- The 20m setback to the east should apply from the new boundary to ensure the human scale is achieved to the new street.
- The building massing should be broken down with separations between the buildings to allow greater solar penetration to communal areas, more view sharing across the site and a legibility to the site.

General Recommendations for the whole development for Height, bulk and scale :

- In the 16 months between the initial April 2005 Urban Design Review and the submission now being assessed there has been only marginal amendment and improvement. The proposal is still unacceptable in terms of urban design and given its importance it is recommended that the proposal be refused.
- This is a state significant development in effect and as such appropriate measure should be put in place to ensure a high quality outcome. The proposal at present is not achieving a sufficiently high standard in its height, bulk and scale to warrant approval for such as major development site at The Entrance.
- It is still recommended that the site be redesigned based on the following intent and objectives:
 - Preservation and continuation of the historic and existing street pattern via maintenance and improvement of Oakland Ave.
 - Provide additional connections and view corridors through the sites from north to south which will improve the existing connectivity.
 - Achievement of a finer grain in building form via breaks in the buildings to the resort and reinforcement of the street edge and alignments by the development.
 - The location of building forms to minimise the overshadowing of private and communal open spaces within these blocks.
 - Provide a street address to all development rather than address the communal open space.
 - Provide a transition in scale and height to the west of the site with adjoining development.
 - Provide a laneway connection to the future car park with the dwellings designed to deal with the eventual

**Further Urban Design Review cont.
The Entrance Resort, The Entrance Rd West, The Entrance.**

car park location to the rear.

Heritage items and their treatment

- This report does not attempt to assess the suitability of the proposed design relative to the heritage item as a separate heritage advisor has now been appointed by Council.

High architectural quality and appearance.

- The overall design of the development is still poor. The architecture is bulky and heavy in its massing and detailing and does not achieve a maritime theme. The extensive use of bulk materials rather than lightweight materials and timber detracts and makes the building appear as a corporate office block rather than a water front resort.
- The monotony in the architectural treatment of all the buildings is also a contributing factor and more variety should be achieved to help with building identity and architectural richness for such a large site.
- The prominence of this site means that it should achieve architectural excellence. The current proposal falls far short of this benchmark.
- The blockiness of the architecture to the south is alienating and effectively turns the developments back on the southern streets despite the conference centre (which is poorly located adjacent to the kitchen loading dock).
- The plant rooms are easily identified and form the silhouette against the skyline for the resort portion of the site.
- The roofs generally are poorly resolved— flat and with little or no articulation. This presents a poor visual outcome on the resorts eastern elevation and NE corner in particular, which is highly visible from the bridge.
- It can therefore not be considered to meet the requirements of DCP 60 in relation to providing an interesting design element on the skyline

Recommendation:

- With such a large site the use of only one architect tends to result in monotony of architectural expression. This is clearly evident in the design presented.
- It is still recommended that the developer use a diverse range of architects to design the development to achieve texture and architectural variety.
- The roofs should be redesigned to achieve a better architectural silhouette and greater interest as required by the DCP. The roof elements should relate to the size and scale of the building.
- Greater articulation is also needed generally in the design of the built form with less reliance on continuous balconies and heavy elements and materials
- The roof plant should be integrated into the appearance of the buildings.
- The new design could also facilitate the use of the roof for sustainable functions such as those listed under the building form section of SEPP 65.
- A greater palette of materials should be used including natural and lightweight materials and construction techniques. This will facilitate a coastal character not achieved in the design without having to resort to 'port hole' solutions.
- The foreshore buildings should celebrate their location more fully by using interesting architectural solutions.

Open Space the public domain & connectivity

General streetscape and foreshore areas

- The proposal intends to close two streets and cover and close the street access along Oakland Street with car park entry points, retailing outlets and concourses and a restaurant precinct.
- Such a solution effectively privatizes public land, removes public access and destroys connectivity to the foreshore. It also raises the ground level up so that entry from Oakland Ave is to an upper floor rather than directly to the water front.

**Further Urban Design Review cont.
The Entrance Resort, The Entrance Rd West, The Entrance.**

- The ground plane across the site is effectively flat and should remain flat rather than creating complex layers that are totally unnecessary and compromise simple public access.
- It also creates a need for numerous raised walkways (unnecessary if the existing grade is maintained) across the site to provide access to the water front. This creates visual clutter and creates dead spaces under these walkways as well as resulting in a very complex circulation system that will detract from the whole pedestrian experience.
- As discussed earlier Oakland Ave is the only continuous north/south street that terminates in a water view and outlook within this portion of the peninsular—other than the water front road. Therefore this street acts as a major connector to the water for both cars, bikes and pedestrians. The view corridor is very significant and offers amenity and easy water access to all the properties fronting onto Oakland Ave.
- Closing this street effectively impoverishes the properties along Oakland Ave as well as local residents and shuts them off from the waterfront.
- The Coastal Design Guidelines specifically require visual and physical access to extend to the waterfront. It requires the protection of streets that provide access and views to the coast, foreshore and headlands. Therefore closing this street would be in direct contradiction to the direction of state government for foreshore areas and against best practice urban design.
- The proposal also intends to close the Entrance Road for the full length of the site and along the Oakland Ave alignment. This is also not supported. Whilst it may be acceptable to close a portion of this street in front of the resort itself, closure should not continue the length of the development site.
- From Oakland Ave the Entrance Rd should be open as a lower order street to public traffic, allowing public access and parking along the foreshore.
- There is no reason why the street could not be reduced in width (although ideally it should provide on street parking to both sides). It could also be designed as a shareway with small unit pavers or other materials. Its closure however effectively privatizes the foreshore and denies clear and free public access to this area of the water front.
- This part of the peninsular does not benefit from the close association with the town centre as the eastern side does. The public promenade there works well due to its association with the town not just because of the resorts. There is a risk in closing the entire foreshore road that the western promenade will become isolated and that it may be unable to sustain the extent of retailing proposed.
- This development needs to differentiate itself and offer a different experience to the eastern side of the peninsular to be successful. Creating a situation of direct competition in its experience and uses will merely impoverish other areas of the Entrance which is a poor outcome.
- This development will effectively alienate all the residential and tourist areas to the south by privatizing the foreshore due to the way the development has been designed. It effectively blocks all connection and flow to the south and captures all the energy and views for itself.
- The layout and design of the ground plane does not facilitate connectivity. Firstly the closure of existing roads reduces visual and physical connection. But the development site also does not offer any direct midblock connections for permeability. Such a prominent location should be aiming to increase permeability not diminish it.
- Each block should be allow a simple and direct route to the water front that preferably also acts to provide view glimpses thought the site for rear blocks and streets. Such breaks also allow view sharing without having to stagger blocks—effectively creating a sheer wall of development for the site length.
- The development also does not appear to provide an appropriate response to public access from the future car park.
- The development still does not provide a good street address or activity to either Oakland Ave or Bent Street. Both are dealt with as ‘back doors’ to the development rather than as required by the DCP.
- The extent of concrete slab construction across both sites necessitates planter box construction and eliminates deep soil zones. This raises issues of on-going landscape maintenance which is beyond our expertise to comment.
- The new tree planting buffer zone at the bridge embankment will still not be of sufficient scale to visually offset the proposed eastern façade when approaching the development from the north along the Entrance bridge.
- The many vehicle entry points degrades the character and street address of the rear of the site and Bent and Oakland Street—the main entry point for most visitors and residents.

**Further Urban Design Review cont.
The Entrance Resort, The Entrance Rd West, The Entrance.**

- The development proposes a sunken retail level below that of the concourse and water front promenade in front of the resort. This means that there are still no retail tenancies on grade for some portions of the promenade.
- This is a poor outcome for the water front which should be able to benefit from on grade access into retail shops rather than having to go down into a food court or up into an arcade. This is not considered to sufficiently activate the foreshore area and is not supported as an approach.
- It also still partially contravenes DCP 60's requirement to provide street front activity at street level.

Recommendations

- Closure and construction over Oakland Rd is not recommended.
- The pedestrianisation of the Entrance Rd in front of the permanent residential is not supported.
- Permeability between building forms needs to be improved and simplified.
- The extensive walkway system should be eliminated with the retention of Oakland Ave and way finding should be simplified.
- Additional on grade retail tenancies should be provided along the full length of foreshore and the Entrance Road should be at grade with direct address onto the foreshore both from the view point of amenity, activation and passive surveillance.

Internal communal and private open space

- Both the resort and the residential sites still locate the main recreational open space areas down in a excavated pit centrally in the site. This is a very poor solution particularly for the residential site.
- For the residential development all ground floor apartments should have the opportunity for access into the apartment from the external areas as a direct address. Ideally wherever possible this should occur from the street or public access way as required by the RDFC.
- Locating residential apartment buildings in a sea of communal open space has been shown to be a very poor approach.
- It lack legibility and tends to lead to deactivation of existing streets. A better solution is to create new public shareways or streets that provide a direct and public address to the building which also achieves identity for residents and visitors alike.
- The buildings should be realigned to address streets wherever possible.
- All ground floor apartments should still ideally have private courtyards to the rear apartments and entry courtyards to the street front to achieve good private open space—refer the Design Code.

Recommendation:

- The open space communal areas should be raised to be on grade for the residential site.
- Buildings should be relocated to ensure communal open spaces receive winter sunlight. The applicants diagrams for the eastern site show that the majority of the communal space will be overshadowed for a significant portion of the day in winter. Consolidation of the open space into a central courtyard would improve its use and also its access to sunlight.
- Clear pedestrian routes should be provided through the sites that provide simple way finding, a sense of address to the different buildings and allow view sharing from the public domain.
- All ground floor apartments should have direct address and courtyards.
- Building separation should be increased to meet the requirements of the Design Code and provide suitable privacy for private open space areas.

Address, visual privacy and amenity

- None of the residential buildings have a street address. All are still accessed via entries from the communal open

**Further Urban Design Review cont.
The Entrance Resort, The Entrance Rd West, The Entrance.**

space. Access to this space is either through the retail areas to the front or the 'back end' of the development via the closed Oakland Ave which reads mainly as a car park entry.

- This approach is not acceptable under SEPP 65 which specifically requires street address for the majority of buildings. This street or public address should be provided by utilising the existing street edges and creating a public shareway or link through the site that provides access to these apartment buildings. The fundamental approach taken is not appropriate for good urban design outcomes.
- There will still be significant safety issues with the arrangement shown including concealment within entry areas, no visual connection from entries to the street and the location of many entry points right next to car park ramps. This does not offer positive amenity or represent good design.
- Way finding within the development and to the development will be confusing particularly for visitors to the permanent residential. These buildings should be accessible easily from the street to an entry lobby and not via numerous contorted pathways through the development site.
- An acceptable number (around 80%) of apartments are now cross-ventilated.
- The Code also requires that 25% of kitchens are naturally ventilated and in fact it appears that 16% are naturally ventilated.
- The majority of wet areas do not have access to natural ventilation. Thrup claims this maximizes windows for habitable areas, is the norm in prestige apartments and is shown in various examples given in the RFDC. The fact is that the RFDC calls for natural ventilation in non-habitable rooms where possible (p.86 RFDC).
- There appears to still be numerous examples of compromised privacy between balconies and habitable spaces on the inner corners of linked buildings (however window positions cannot be determined from these plans). This should be resolved to provide proper separation between these apartments.
- All apartments should be required to have internal storage within the apartment or in the garages as required by the Design Code.
- Outlook and internal amenity still cannot be assessed from the submitted drawings as windows are not discernible.
- There are also still no direct street addresses to the resort buildings. This means that any visitor will have to enter their apartment through the main entry. Whilst this is understood it should also be possible to provide secure entry points and foyers to each of the main building blocks from the streets that use room keys. This would improve amenity for visitors and activity on the surrounding side streets.

Recommendation:

- The site should be redesigned to locate as many apartment buildings as possible with addresses to The Entrance Road (with commercial areas contained within these buildings rather than as separate exaggerated forms), Oakland Ave and Clifford Street.
- The design should be amended to achieve improved natural ventilation to kitchens as above.
- Internal storage is to be provided as required by the Design Code.
- All privacy and amenity situations are to be addressed by improving the building separation and or window locations.
- More activity should be provided to the new street near the bridge and Bent Street. This could be via building entry points, some commercial tenancies and providing additional retailing to Bent Street—particularly given the intent for further tourist related development south of the site.

Other Design Issues

- The mix of dwellings is very poor. There are still mainly 2 and 3 bedroom apartments.
- The development does not demonstrate energy efficiency as required both by SEPP 65 and DCP 60. Mention is made of orientation and some cross ventilation but there do not appear to be any strategies around energy generation, water storage and reuse etc.

**Further Urban Design Review cont.
The Entrance Resort, The Entrance Rd West, The Entrance.**

Recommendation

- The mix of dwellings should be adjusted to provide a more balanced diversity of dwelling types and bedroom sizes.
- A development of this site should be leading edge in its energy efficiency initiatives. The applicant should be required to provide initiatives in energy generation, passive solar design, natural ventilation, water management, storage and reuse etc throughout all areas of the design including the landscape strategy for the site to minimise water usage.

Conclusion:

Therefore on the basis of the above assessment the proposal does not provide a high quality solution for the site and it is recommended that the proposal be refused. Any future application should address the following:

- No privatisation of public streets.
- Partial closure of The Entrance Road adjacent to the resort component may be possible although ideally this would be as a shareway. Full closure of this street and Oakland Street should not be contemplated.
- The Residential development should be set back further from the western boundary or the height of the two forms along the western boundary should be reduced to a maximum of 4 storeys.
- The separation between buildings and apartments is still generally unacceptable and should be increased to meet the suggested separations within the Design Code.
- The residential and resort buildings should be positioned and designed to reduce apparent bulk with clear uninterrupted view lines through the development to reduce its massing.
- The 20m setback to the east should apply from the new boundary to ensure the human scale is achieved to the new street.
- The proposal at present is not achieving a sufficiently high standard in its height, bulk and scale to warrant approval for such as major development site at The Entrance.
- Preservation and continuation of the historic and existing street pattern via maintenance and improvement of Oakland Ave.
- Provide additional connections and view corridors through the sites from north to south which will improve the existing connectivity.
- Achievement of a finer grain in building form via breaks in the buildings to the resort and reinforcement of the street edge and alignments by the development.
- The location of building forms to minimise the overshadowing of private and communal open spaces within these blocks.
- Provide a street address to all development rather than address the communal open space.
- Provide a transition in scale and height to the west of the site with adjoining development.
- Use a diverse range of architects to design the development to achieve texture and architectural variety.
- The roofs should be redesigned to achieve a better architectural silhouette and greater interest as required by the DCP. The roof elements should relate to the size and scale of the building.
- Greater articulation is also needed in the design of the built form with less reliance on continuous balconies and heavy elements and materials
- The roof plant should be integrated into the appearance of the buildings.
- The new design could also facilitate the use of the roof for sustainable functions such as those listed under the building form section of SEPP 65.
- A greater palette of materials should be used including natural and lightweight materials and construction techniques. This will facilitate a coastal character not achieved in the design without having to resort to 'port hole' solutions.
- The pedestrianisation of the Entrance Rd in front of the permanent residential is not supported.
- Permeability between building forms needs to be improved and simplified.

**Further Urban Design Review cont.
The Entrance Resort, The Entrance Rd West, The Entrance.**

- The extensive walkway system should be eliminated with the retention of Oakland Ave and way finding should be simplified.
- Additional on grade retail tenancies should be provided along the full length of foreshore and the Entrance Road should be at grade with direct address onto the foreshore both from the view point of amenity, activation and passive surveillance.
- The open space communal areas should be raised to be on grade for the residential site.
- Consolidation of the open space into a central courtyard would improve its use and also its access to sunlight.
- A sense of address to the different buildings should be provided.
- All ground floor residential apartments should have direct address to the public areas or streets with entry courtyards as required by SEPP 65.
- The site should be redesigned to locate as many apartment buildings as possible with addresses to The Entrance Road (with commercial areas contained within these buildings rather than as separate exaggerated forms), Oakland Ave and Clifford Street.
- The design should be amended to achieve improved natural ventilation to kitchens as above.
- More activity should be provided to the new street near the bridge and Bent Street.
- The mix of dwellings is poor. There are still mainly 2 and 3 bedroom apartments.
- The development does not appear to demonstrate energy efficiency as required both by SEPP 65 and DCP 60. Mention is made of orientation and some cross ventilation but there do not appear to be any strategies around energy generation, water storage and reuse etc.