

Our Ref: M170091/LT1

7 April 2020

The General Manager  
Bayside Council  
444-446 Princes Highway,  
**ROCKDALE NSW 2216**

**Attention: Mr John McNally**

Dear John,

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION  
187 SLADE ROAD, BEXLEY NORTH**

We act as town planning consultants to the owner of the above property. Specifically, we have been instructed to make representation to Council in response to the email request for additional information on 27 February 2020. In summary, we have prepared scaled plans for consideration of Council but consider that the provision of a Draft Development Control Plan (DCP) is unnecessary at this stage given Council has not indicated its support, or otherwise, of the planning proposal and its indicative concept scheme. In any case, the Urban Design Study by GMU makes clear the style of envelope controls that would ultimately be included in a DCP which in our experience is often drafted post Gateway determination.

We address the issues raised by Council individually.

**1. If possible, please provided scale drawings at a commonly-used scale of the site plan, indicative concept layouts, indicative basements and indicative sectional studies;**

GMU have provided scaled drawings of 1:500 at A3 for the indicative concept scheme, including the basements. These documents are submitted under a separate attachment.

It is noted that the indicative sections are detailed on Page 27 of the Urban Design Report (UDR) prepared by GMU which, whilst not to scale, have indicative RLs. The provision of scale sections is beyond the scope of the indicative concept plans as the design will require detailed structural, geotechnical and traffic input that will be provided at the development application stage. The provision of indicative sections with RLs is considered appropriate at this stage of the planning proposal.

**2. Please provide a level-by-level breakdown of the proposed GFA through an area schedule and measured area plans of all levels as described below, as well as a short description of how the GFA/FSR was measured/calculated;**

GMU have provided a level by level breakdown of the Gross Buildable Area (GBA) and the Gross Floor Area (GFA) which are submitted under a separate attachment.

GMU have provided the following description with regards to how the GBA and GFA were considered:



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“In arriving at the estimated GBA as indicated in drawings SK-013 to SK-021, GMU has calculated the GBA shown in the blue hatched lines in the drawings. GMU has arrived on an efficiency of 75% based on Part 2B of the Apartment Design Guide (ADG) which states that *a building envelope should be 25-30% greater than the achievable floor area to allow for building components that do not count as floor space but contribute to building design and articulation such as balconies, lifts, stairs and open circulation*. However, we are aware that a 75% efficiency is a conservative estimate, especially for commercial uses but it will allow for architectural detailing and building articulation. Subject to detailed design, the GFA will be in accordance with the LEP definition.”

3. **Please provide measured area plans: GBA overlays of the existing “Indicative Concept Design” layouts that were provided in the UDR. Plans should be provided at a commonly used drawing scale. For each level, please highlight each separate measured area of non-residential, residential and/or non-GFA (services/parking) use;**

As discussed above, the scaled GBA and GFA calculations are submitted under a separate attachment.

The indicative concept plans have not detailed the floor areas by use. As the plans are to scale, calculations on the floor areas for each use can be undertaken by Council if required. However, it should be noted that the detailed areas of the residential and non-residential uses have not been determined and will be subject to detailed design at the development application stage.

If the intention of Council is to impose an FSR for non-residential floor space, this can be discussed and the indicative concept design can be altered (if required) at later stages in the planning proposal.

4. **Please provide an area schedule: A table summary of the measured areas of each use on each level including basements, all efficiency assumptions (separated by use) that were used to derive a GFA from the measured areas, and the subsequent GFA by level by use; and**

As discussed in Part 3 above.

5. **Please provide HOB and FSR maps that have been notated with dimensions sufficient to accurately identify the division of the site into the two separate sections that delineate where the various heights are apportioned and the areas upon the FSR calculations have been based.**

GMU have provided dimensioned Height of Buildings (HOB) and Floor Space Ratio (FSR) maps to identify the division between the height limits. These plans are submitted under a separate attachment.

**In addition, paragraph 3.2 of the Planning Proposal Report states that a ‘site-specific Development Control Plan (DCP) will be prepared post-Gateway’ for public exhibition...’ A draft version of the DCP needs to be provided as part of the current document submission so that it can be shown to the Bayside Local Planning Panel and Council to assist with the assessment of whether the Planning Proposal has merit.**

It is envisaged that the draft Site Specific DCP will be prepared post gateway determination for public exhibition. We consider that the provision of a draft Site Specific DCP is premature at this stage as there has been no indication from Council for support, or otherwise, of the planning proposal. For example, if the indicative concept design evolves after discussions with Council or the BLPP, all the work on the draft Site Specific DCP would be redundant.

The document *Planning Proposals: A Guide to Preparing Planning Proposals* states:

*A planning proposal which is submitted for a Gateway determination must provide enough information to determine whether there is merit in the proposed amendment proceeding to the next stage of the plan making process. The level of detail required in a planning proposal should be proportionate to the complexity of the proposed amendment.*

*A planning proposal relates only to a LEP amendment. It is not a development application nor does it consider specific detailed matters that should form part of a development application.*

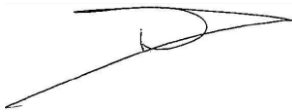
*The planning proposal should contain enough information to identify relevant environmental, social, economic and other site-specific considerations. The scope for investigating any key issues should be identified in the initial planning proposal that is submitted for a Gateway determination. This would include listing what additional studies the PPA considers necessary to justify the suitability of the proposed LEP amendment. The actual information/investigation may be undertaken after a Gateway determination has been issued and if required by the Gateway determination.*

As such, we would say that the scaled indicative concept plans (attached) and information submitted within the UDR and PP Report are sufficient to determine whether there is merit in the planning proposal application. Furthermore, as the Planning Proposal only seeks to modify the height and FSR development standards, the planning proposal is not of a sufficient complexity to warrant detailed analysis (Site Specific DCP) prior to Gateway.

We thank Council for their time and consideration of the above matters and hope the additional information submitted will permit the continued assessment of the planning proposal application.

We look forward to continuing to work with Council on this planning proposal application.

Yours faithfully,  
Planning Ingenuity Pty Ltd



David Waghorn  
**ASSOCIATE DIRECTOR**