

**DETAILED ASSESSMENT OF PLANNING PROPOSAL**

**PLANNING PROPOSAL 2022/1  
641-653, and 655A Pacific Highway Chatswood**

**The Site**

The overall site which is the subject of this Planning Proposal involves:

- 641-653 Pacific Highway Chatswood, being SP 12238.
- 655A Pacific Highway Chatswood, being SP 57067.

The site has a total area of 5,774m<sup>2</sup>, bounded by the Pacific Highway to the west, the Chatswood Bowling Club to the east, 689 Pacific Highway to the north and Gordon Avenue to the south. Refer below to **Figure 1 – Location Plan**.

Vehicle access for 641-653 Pacific Highway is via Gordon Avenue. Vehicle access for 655A Pacific Highway is in via Hammond Lane and out via the Pacific Highway. There are a number of easements across 655A Pacific Highway, some being in favour of the Chatswood Bowling Club with particular regard to rights of carriageway and 41 dedicated car parking spaces.

**Figure 1 – Location Plan**



Existing development on the site is as follows:

- 641-653 Pacific Highway comprises a three-storey residential flat building.
- 655A Pacific Highway comprises a three-storey residential flat building, with a one-way driveway left-out exit onto Pacific Highway. The driveway also provides 41 car parking spaces and access dedicated to the Chatswood Bowling Club.

Under *Willoughby Local Environmental Plan 2012* (WLEP 2012) the site is zoned R3 Medium Density Residential, with a maximum height of 12m and maximum floor space ratio of 0.9:1.

The Planning Proposal has been lodged by One Global Capital on the NSW Planning Portal on 11 March 2022, with the required fees paid to Willoughby Council on 7 April 2022. The Planning Proposal was subsequently allocated the Council reference number 2022/1.

### **The Locality**

To the west of the site, on the other side of the Pacific Highway, is land zoned R3 Medium Density Residential and characterised by residential flat buildings and low density detached dwellings.

To the east of the site, land is characterised by the Chatswood Bowling Club (655 Pacific Highway).

The northern boundary interfaces land zoned R3 Medium Density Residential, characterised by two and three storey residential flat buildings and low density dwellings fronting Pacific Highway. Land to the north is part of the Chatswood CBD and comes under the CBD Strategy. A Planning Proposal has been lodged regarding properties to the north from 691, 695 and 699 Pacific Highway (689 Pacific Highway has not been included).

Properties to the north from 689-701 Pacific Highway all have vehicle access solely from Pacific Highway. Immediately to the north of the Chatswood Bowling Club is the CBD Strategy identified key public space at the Tennis courts and Croquet Greens.

Planning Proposals consistent with the CBD Strategy have already been supported by Council and made for 5-9 Gordon Avenue to the east, 613-627 Pacific Highway, 629-637 Pacific Highway and 10 Gordon Avenue and 15-19 Nelson Street to the south, and 9-11 Nelson Street to the south east, of the subject site.

### **Background**

The subject site is located within the Chatswood CBD boundary identified in the *Chatswood CBD Planning and Urban Design Strategy 2036* (referred to in this report as the CBD Strategy) endorsed by Council on 26 June 2017, supported by the Greater Sydney Commission on 18 May 2018, and endorsed by the Department of Planning and Environment (DPE) on 9 July 2020. Endorsement of the CBD Strategy was further noted by Council on 14 September 2020.

Under the CBD Strategy, the site was recommended as a B4 Mixed Zone with a maximum height of 90 metres and a floor space ratio of 6:1. This zone and maximum controls were subject to the satisfaction of other CBD Strategy key elements and *Willoughby Local Environmental Plan 2012* (WLEP 2012) requirements.

The CBD Strategy has now been incorporated into the comprehensive WLEP 2012 review, endorsed for finalisation at the Council Meeting dated 12 December 2022, and now made by DPE and notified on 30 June 2023 (Amendment 34).

Under WLEP 2012 (Amendment 34), this Planning Proposal site was saved under the previous controls – noting that there was a submitted Planning Proposal to be assessed and determined based on the CBD Strategy.

655A Pacific Highway was originally part of the Chatswood Bowling Club site known as 655 Pacific Highway. On 29 May 1995 Council resolved to rezone what is now known as 655A Pacific Highway to Residential 2 (c) under WLEP 1995 (a medium density residential zone), gazetted on 17 November 1995. Development Application 1995/0477, and Subdivision Applications 1996/0092 and 1996/2005 were subsequently approved on 18 March 1996 for construction of a residential flat building and an associated two lot subdivision (which created 655A Pacific Highway), also providing parking associated with the Chatswood Bowling Club (41). Some parking associated with the Chatswood Bowling Club and Croquet Premises (6) remained on the Chatswood Bowling Club site (655 Pacific Highway).

### **Planning Proposal**

The Planning Proposal submitted seeks to:

- Change the zoning from R3 Medium Density Residential to MU1 Mixed Use
- Increase the maximum height of buildings control from 12m to 90 metres
- Increase the maximum Floor Space Ratio control from 0.9:1 to 6:1
- Apply a minimum non-residential floor space requirement equating to 17% of total assessable GFA on the site.

The proposed amendments to *Willoughby Local Environmental Plan 2012* are detailed in Table 1 below.

**Table 1 – Summary of Planning Proposal Amendments**

	<b>641-653 and 655A Pacific Highway Chatswood</b>	<b>Compliance</b>
<b>Zoning</b>		
Current WLEP 2012	R3 Medium Density Residential	<b>Yes</b>
Proposed in Planning Proposal	MU1 Mixed Use	
<b>Floor Space Ratio</b>		
Current WLEP 2012	0.9:1	<b>Yes</b>
Proposed in Planning Proposal	6:1	
<b>Height</b>		
Current WLEP 2012	12m	<b>Yes</b>
Proposed in Planning Proposal	90m	
<b>Affordable Housing</b>		
Current WLEP 2012	10% of residential GFA	<b>No, however satisfactory in this circumstance.</b>
Proposed in Planning Proposal	4% of residential GFA	
		<b>Refer to discussion section of report.</b>

Following assessment of the Planning Proposal, and consideration of the Transport for NSW letter dated 9 March 2023, Council has requested additional information to address a number of issues. The latest information was provided in September 2023.

The amended concept plans show the potential redevelopment of the entire site as follows:

- Two towers above a podium of between one and three storeys
- Tower 1 (north tower – towards 689 Pacific Highway)
  - Total height of 27 storeys (90m), containing:
    - 1 storey non-residential podium facing: Pacific Highway, 689 Pacific Highway, Chatswood Bowling Club
    - 2 storeys of non-residential,
    - 22 storeys of residential,
    - 1 storey lift overrun / plant,
    - 1 storey residential amenity area.

- Residential tower floor plate: 692m<sup>2</sup> (22 storeys)
- Non-residential GFA: 3,230m<sup>2</sup>
- Residential GFA: 15,583m<sup>2</sup>
- Tower 2 (south tower – towards Gordon Avenue)
  - Total height of 27 storeys (90m), containing:
    - 1 storey non-residential podium facing: Pacific Highway and Gordon Avenue
    - 2 storeys of non-residential,
    - 22 storeys of residential,
    - 1 storey lift overrun / plant,
    - 1 storey residential amenity area.
  - Residential tower floor plate: 589m<sup>2</sup> (22 storeys)
  - Non-residential GFA: 2,542m<sup>2</sup>
  - Residential GFA: 13,277m<sup>2</sup>
- Total FSR of 6:1 (34,632m<sup>2</sup>), containing:
  - 5:1 residential (28,860m<sup>2</sup>) including affordable housing
  - 1:1 non-residential (5,772m<sup>2</sup>)
- Total number of residential apartments: 319
- Tower 1 (north tower – towards 689 Pacific Highway) - Ground Level setbacks:
  - 4m setback to Pacific Highway
  - 8m setback to 689 Pacific Highway
  - Approx. 12-16m setback to Chatswood Bowling Club
  - 12m to Tower 2 podium
- Tower 1 (north tower – towards 689 Pacific Highway) – Tower setbacks:
  - 6m above podium to the Pacific Highway (making overall setback 10m when including ground setback)
  - Minimum 4.5m above podium to 689 Pacific Highway (making overall setback 12.5m when including ground setback)
  - 7m above podium to the Chatswood Bowling Club (making overall setback minimum 19m when including ground setback)
  - 24m setback above podium to Tower 2
- Tower 2 (south tower – towards Gordon Avenue) - Ground Level setbacks:
  - 4m setback to Pacific Highway
  - 1.5m setback to Gordon Avenue
  - 3m setback to Hammond Lane
  - 12m to Tower Podium 1
- Tower Podium 2 (south tower – towards Gordon Avenue) – Tower setbacks:
  - 6m above podium to the Pacific Highway (making overall setback 10m when including ground setback)
  - 3m above podium to Gordon Avenue (making overall setback 4.5m when including ground setback)
  - 3m to above podium to Hammond lane (making overall setback 6m when including ground setback)
  - 24m setback above podium to Tower 1

Other Concept plan details:



- A through site link is provided from Gordon Avenue and Hammond Lane to the northern boundary and western boundary (the Pacific Highway). Minimum width 3m. Public ROW proposed.
- All vehicle access and egress via Hammond Lane.
- All loading for site at basement level, accessed via Tower 2, with loading vehicles access / egress in a forward direction via a physical solution.
- Deep soil planting provided in Pacific Highway setback.
- Podium / Level 1 – Proposed as communal open space.
- 310 parking spaces within basement
- 35 car spaces for the Chatswood Bowling Club proposed under future bowling green basement (this is a concern, discussed in this report and addressed in the Officers recommendation).
- 6 car spaces for the Chatswood Bowling Club (CBC) proposed at ground level, adjacent the shared boundary with 655A Pacific Highway. ROW benefitting CBD proposed for access and car spaces.
- Existing egress to Pacific Highway not to be used by 641-655A Pacific Highway and CBC. This is to be closed off by a physical barrier and only to be used by 689-699 Pacific Highway. This is to be the subject of a ROW.

The existing rights of the Chatswood Bowling Club have been incorporated into the Planning Proposal, with regard to pedestrian and vehicle access.

The Concept Plans are at **Attachment 4**. Council officers have prepared site specific and precinct *Development Control Plan* provisions which are discussed below (Refer to **Attachment 6**). The precinct provisions are based on the Precinct Plan for 641 to 745 Pacific Highway, developed by Council in consultation with Transport for NSW (Refer to **Attachment 5**).

The Planning Proposal is accompanied by a draft Voluntary Planning Agreement including:

- Payment of a monetary contribution comprising the CIC payable under Council's Planning Agreements Policy.

## Discussion

Discussion of the Planning Proposal is based on the 'Key Elements of Future LEP and DCP Controls' contained in the CBD Strategy dated September 2020, listed 1 to 35, with comments provided. These Key Elements have been incorporated, as appropriate, into *Willoughby Local Environmental Plan 2012* (WLEP) - Amendment 34, made and notified on 30 June 2023 and *Willoughby Development Control Plan* (endorsed by Council and updated accordingly). Any mention of the B4 Mixed Use zone should be read as MU1 Mixed Use under WLEP 2012 (Amendment 34).

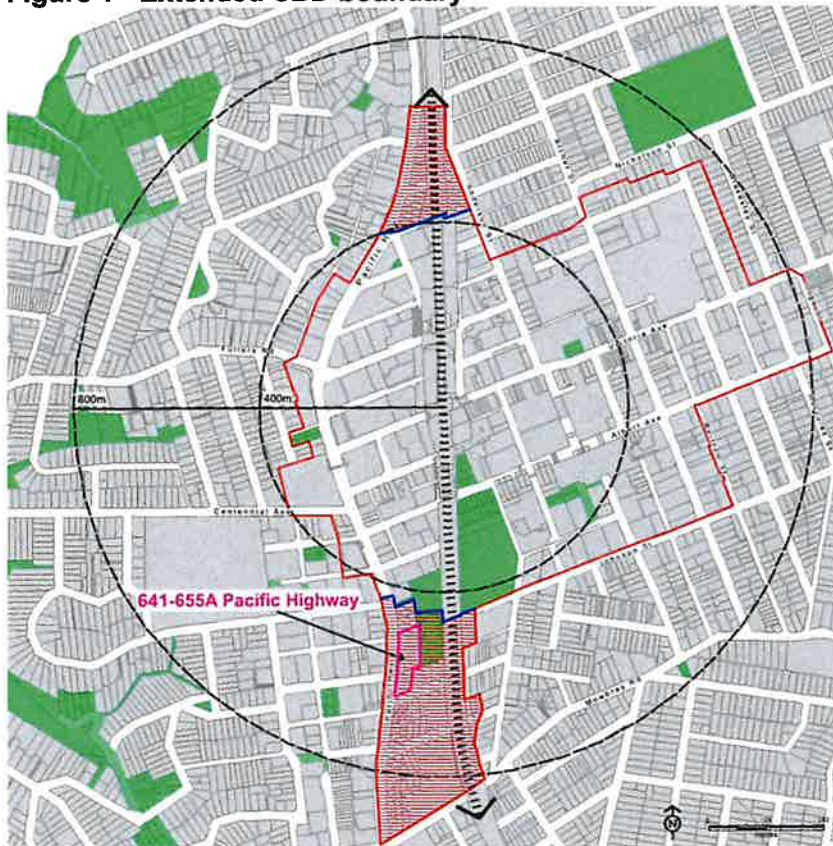
## CBD Boundary

**Key Element 1.**      **The Chatswood CBD boundary is expanded to the north and south as per Figure 1 to accommodate future growth of the centre.**

### Comment

The subject site is located within the expanded Chatswood CBD boundary proposed in the CBD Strategy, as shown below in **Figure 1 - Extended CBD boundary**.

**Figure 1 - Extended CBD boundary**



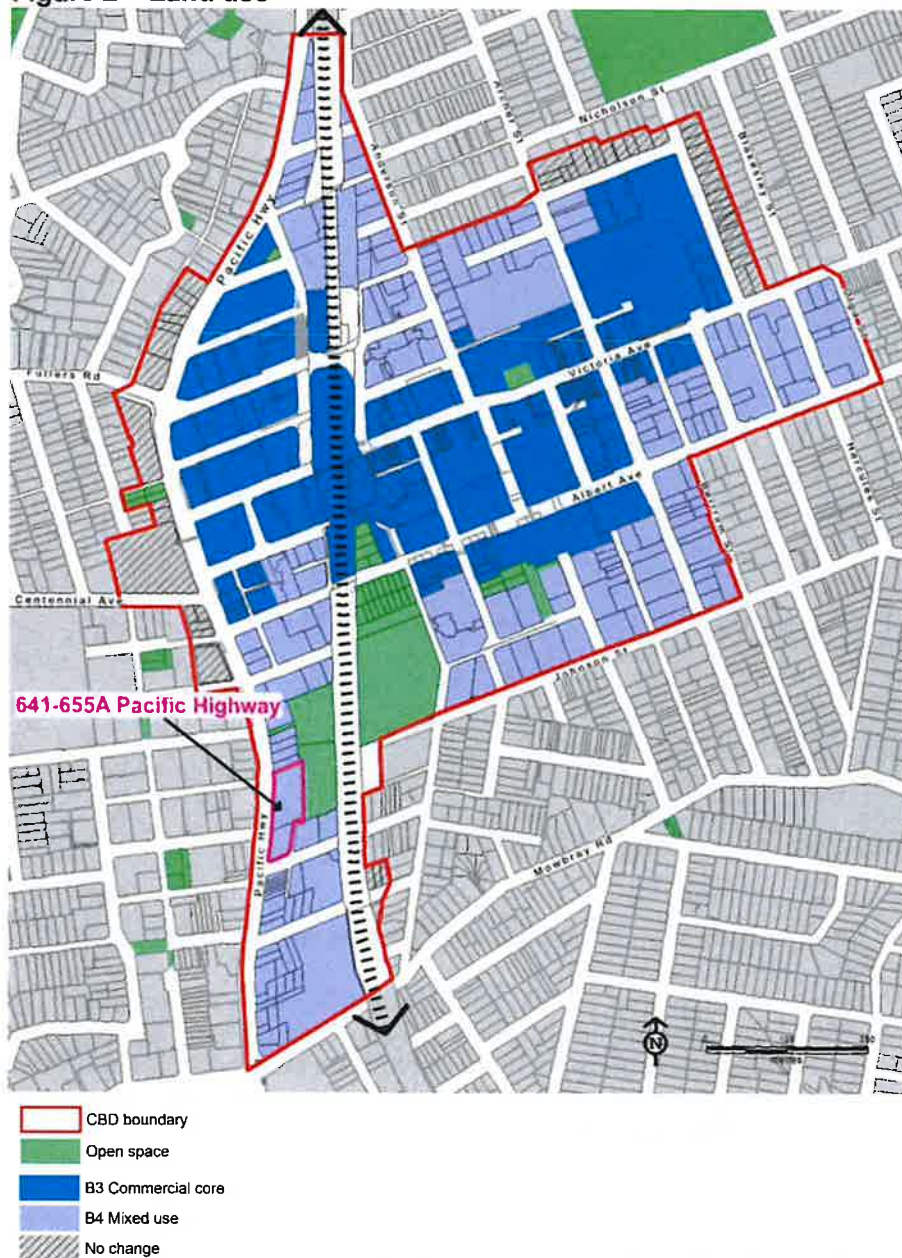
**Land Use**

- Key Element 2.** Land uses in the LEP will be amended as shown in Figure 2, to:
- (a) Protect the CBD core around the Interchange as commercial, permitting retail throughout to promote employment opportunities (with no residential permitted).
  - (b) Enable other areas to be mixed use permitting commercial and residential.

**Comment**

The subject site is located in that part of the Chatswood CBD identified as Mixed Use, meaning part non-residential and part residential. Refer below to **Figure 2 – Land use**.

**Figure 2 – Land use**



The proponent has proposed the zoning for the site be changed from R3 Medium Density Residential to MU1 Mixed Use in the WLEP 2012 Land Zoning Map.

The concept plans propose a Mixed Use development, with non-residential on the ground, level 1 and 2 (total 3 storeys) (1:1, 17%), with residential above (5:1).

Regarding land use, the Planning Proposal is considered consistent with the CBD Strategy.

**Key Element 3.      The existing DCP limits on office and retail use in parts of the Commercial Core to be removed.**

**Comment**

This Key Element is not applicable to the Planning Proposal as the site is not located within the E2 Commercial Centre zone.



**Key Element 4.        Serviced apartments to be removed as a permissible use from the B3 Commercial Core zone.**

Comment

This Key Element is not applicable to the Planning Proposal as the site is not located within the E2 Commercial Centre zone.

**Planning Agreements to fund public domain**

**Key Element 5.        Planning Agreements will be negotiated to fund public domain improvements.**

Comment

The proponent has put forward a draft voluntary planning agreement that is generally supported by Council officers.

**Key Element 6.        A new Planning Agreements Policy will apply and be linked to a contributions scheme that will provide the public and social infrastructure in the Chatswood CBD necessary to support an increased working and residential population.**

**The scheme would:**

- a) Apply to residential uses.**
- b) Apply to commercial uses above 10:1 FSR.**
- c) Operate in addition to any adopted Section 7.11 or 7.12 contributions scheme and separate from Affordable Housing requirements within Willoughby Local Environment Plan (WLEP).**
- d) Contribute to public domain improvements in the centre (including streets and parks) that would enhance amenity and support residential and commercial uses.**

Comment

The Planning Proposal is accompanied by a draft Voluntary Planning Agreement involving payment of a monetary contribution comprising the CIC payable under Council's Planning Agreements Policy.

Separate to the VPA, affordable housing and Section 7.12 contributions are proposed.

**Key Element 7.        All redevelopments in the Chatswood CBD should contribute to public art in accordance with Council's Public Art Policy.**

Comment

The draft DCP provisions state that *"Public Art is to be provided in accordance with Council's Public Art Policy."*

The intention of a public art contribution is that it is subject to a Council policy where that money is to be spent. This does not prevent a proponent addressing public art on-site separately to Council.

**Design Excellence and Building Sustainability**

**Key Element 8.**      **Design excellence is to be required for all developments based on the following process:**  
a) **A Design Review Panel for developments up to 35m high.**  
b) **Competitive designs for developments over 35m high.**

Comment  
Consistent

The Planning Proposal involves a development that is over 35 metres in height. On this basis a competitive design process is envisaged at development application stage to ensure design excellence under existing WLEP 2012 Clause 6.23 Design Excellence at certain sites. In this regard the subject site is to be included on the Special Provisions Area Map.

**Key Element 9.**      **Achievement of design excellence will include achievement of higher building sustainability standards.**

Comment  
Consistent

As part of the competitive design process to achieve design excellence, higher building sustainability standards are expected. This is acknowledged by the proponent.

The proposed Development Control Plan provisions include a requirement that a minimum 5 star GBCA building rating is expected. An assessment report is to be submitted at Development Application Stage.

**Key Element 10.**      **The Architects for design excellence schemes should be maintained through the development application process and can only be substituted with written agreement of Council.**

Comment  
With regard to Key Element 10, it is considered that the Planning Proposal is consistent with the CBD Strategy and will be further considered at design excellence stage.

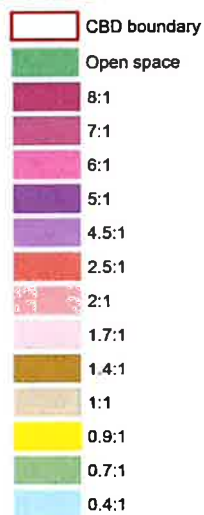
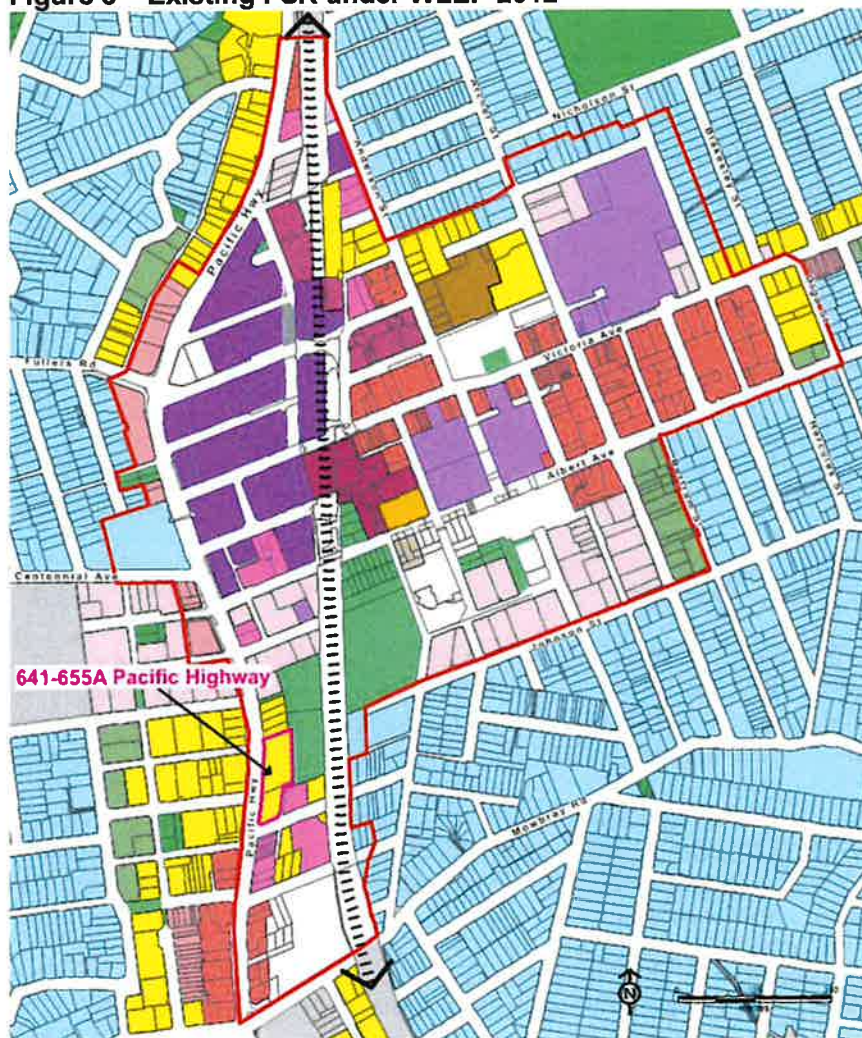
#### **Floor Space Ratio (FSR)**

**Key Element 11.**      **Figure 3 shows the existing FSR controls under WLEP 2012.**

Comment  
The subject site is in a location with a maximum floor space ratio of 0.9:1 (relating to the R3 Medium Density Residential land) as shown below in **Figure 3 – Existing FSR under WLEP 2012.**

The Planning Proposal seeks to increase this to 6:1, which is discussed below in Key Element 12.

Figure 3 – Existing FSR under WLEP 2012



- Key Element 12.** Minimum site area of:
- a) 1800sqm for commercial development in the B3 Commercial Core zone.
  - b) 1200sqm for mixed use development in the B4 Mixed Use zone.
- to achieve maximum FSR as indicated in Figure 4.

Site amalgamation is encouraged to meet this minimum requirement. In addition sites should not be left isolated.

Comment

The subject site is 5,774m<sup>2</sup> and is well above the minimum site area of 1200m<sup>2</sup> for mixed development involving residential land use.

Under WLEP 2012, minimum lot sizes for commercial and mixed use development in Chatswood CBD is addressed in Clause 6.16 and the Lot Size Map. The objective of the minimum site area is addressed in Part L, Section 4.3.1, c) of WDCP.

In response to the subject Planning Proposal and the amalgamated site involved, it is proposed to introduce a site specific lot size requirement of 5,500m<sup>2</sup> on the Lot Size Map.

- Key Element 13.** The FSRs in Figure 4 should be considered as maximums achievable in the centre subject to minimum site area and appropriate contributions, and are as follows:
- a) No maximum FSR for commercial development in the B3 zone.
  - b) A range of FSR maximums in the B4 zone, surrounding the B3 zone, reflecting context.
  - c) Retention of 2.5:1 FSR along northern side of Victoria Avenue east.

Floor space ratio maximums are not necessarily achievable on every site, and will depend on satisfactorily addressing:

- a) Site constraints,
- b) Surrounding context,
- c) Other aspects of this Strategy including setbacks at ground and upper levels,
- d) SEPP 65 and the associated Apartment Design Guidelines.

Comment

Consistent.

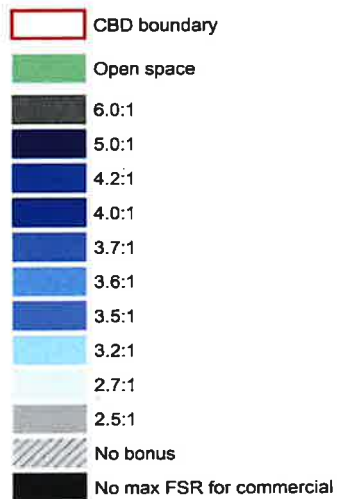
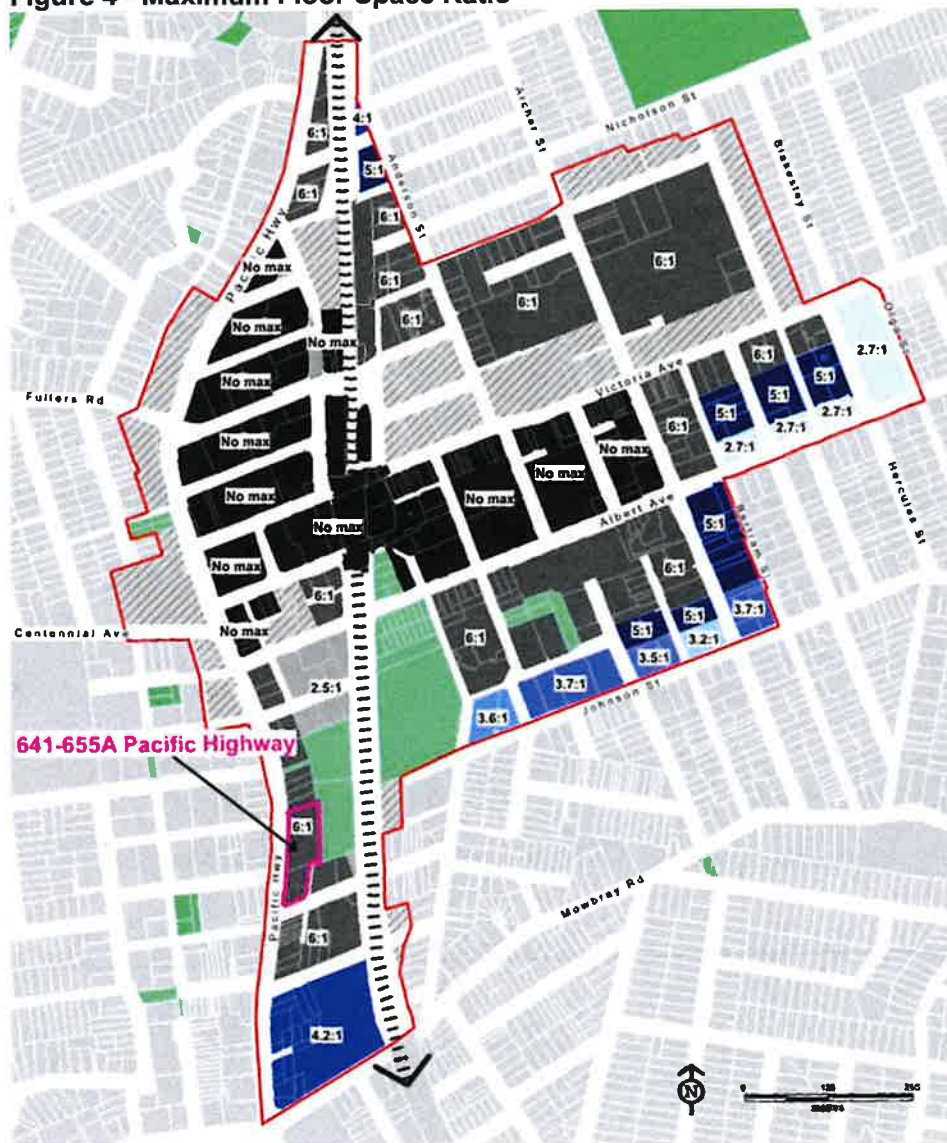
The subject site is in a general location with an FSR of 6:1, as shown below in **Figure 4 - Maximum Floor Space Ratio**.

The Planning Proposal proposes a maximum FSR of 6:1, which includes affordable housing, and is therefore consistent with the CBD Strategy.

Under WLEP 2012, floor space ratio is addressed in Clause 4.4 and the Floor Space Ratio Map.



Figure 4 - Maximum Floor Space Ratio



**Key Element 14. Affordable housing is to be provided within the maximum floor space ratio, and throughout a development rather than in a cluster.**

Comment

Under *Willoughby Local Environmental Plan 2012* (Amendment 34), (WLEP 2012), which came into effect on 30 June 2023, contributions can be sought for the provision of affordable housing within the Chatswood CBD at a rate of 10% of the residential gross floor area. Affordable housing is addressed under Clause 6.8 and the Affordable Housing Map of WLEP 2012.

Under the comprehensive review of Council's LEP, which began in December 2020 and led to WLEP 2012 (Amendment 34), contributions towards affordable housing was proposed to be increased in some parts of the LGA from 4% to 10%. The subject site, which is located within the Chatswood CBD, was saved from the proposed increase due to the timing of the subject Planning Proposal lodgement.

The floor space ratio of 6:1 proposed in the Planning Proposal includes affordable housing (at 4%), to be provided in accordance with Council's DCP requirements.

It is noted that Planning Proposal 2022/1 for the subject site was lodged as follows:

- Lodged on the NSW Planning Portal on 11 March 2022.
- Fee paid and assessment commenced on 7 April 2022.

Planning Proposal 2022/1 was lodged, with fee paid and assessment commencing, prior to the end of the comprehensive WLEP 2012 review exhibition (7 June 2022).

Under WLEP 2012, affordable housing is addressed in Clause 6.8 and the Affordable Housing Map.

To achieve the above 4% in regards implementation under WLEP 2012, the site is to be included on the Affordable Housing Map.

While a greater affordable housing provision may be encouraged, it is fair and reasonable to consider the proposed provision of a 4% affordable housing contribution in the assessment of this specific Planning Proposal.

**Key Element 15. Where the maximum floor space ratio of 6:1 is achieved, the minimum commercial floor space ratio sought in development in a Mixed Use zone is 1:1.**

**The objective of this Key Element is to achieve a satisfactory level of commercial in the B4 Mixed Use zone to deliver a reasonable amount of employment floor space, typically to be within the podium levels of a development. This will be moderated depending on the overall FSR.**

Comment

Consistent.

The proponent has indicated that a commercial component of 1:1, 17% will be provided, and has shown this in the concept plans provided.

Under WLEP 2012, the minimum commercial component in the MU1 Mixed Use zone is addressed in Clause 6.25.

### **Built Form**

- Key Element 16.** In order to achieve the slender tower forms sought by Council the maximum floor plate at each level of a development should be no more than:
- a) 2000sqm GFA for office (to achieve this maximum a large site would be required).
  - b) 700sqm GFA for residential towers above Podium within Mixed Use zones.

#### Comment

Consistent.

The towers above the podiums shown in the Concept Plans contain a maximum floor plate Gross Floor Area of:

- Tower 1 (north tower – towards 689 Pacific Highway): 692m<sup>2</sup>
- Tower 2 (south tower – towards Gordon Avenue): 589m<sup>2</sup>

This is below the identified Gross Floor Area maximum of 700m<sup>2</sup>.

Under WDCP, slender towers and floor plate size are addressed in Part L, Section 4.3 Controls for Chatswood, 4.3.1, d).

- Key Element 17.** In pursuit of the same goal of slender tower forms, the width of each side of any tower should be minimised to satisfactorily address this objective. To the same end, design elements that contribute to building bulk are not supported, and should be minimised.

**Setbacks are considered an important part of achieving slender tower forms.**

#### Comment

Consistent.

The dimensions of the residential towers shown in the Concept Plans are considered generally consistent with the slender tower objective and an appropriate response to the site.

It should be noted that setbacks consistent with, and in some cases greater than, CBD Strategy requirements have been provided.

Consistency with the CBD Strategy setback requirements, as well as the provision of additional setbacks, has assisted in satisfying the slender tower objective. Setbacks are discussed below.

Building articulation and appropriate architectural design responses will be further explored at design excellence stage.

Notwithstanding the above, attention is drawn to the east / west presentation of the proposed development in the concept plans. The proponent is encouraged to examine options that assist in the minimisation of tower height and width as it presents east / west. This is not to result in further building coverage at ground level.

Under WDCP, slender towers are addressed in Part L, Section 4.3 Controls for Chatswood, 4.3.1.

**Key Element 18.** If there is more than one residential tower on a site, sufficient separation is to be provided in accordance with setbacks required in this Strategy, SEPP 65 and the Apartment Design Guidelines, to ensure that the slender tower form objective is achieved. Council will seek to avoid an outcome where two towers read as one large tower. Towers are not to be linked above Podium and should operate independently regarding lifts and services.

Comment

Two towers are proposed in the concept plans.

The building separation between the two towers shown in the concept plans is 24m in accordance with the requirements of SEPP 65 and the Apartment Design Guidelines.

This Key Element has been satisfactorily addressed.

Under WDCP, slender towers are addressed in Part L, Section 4.3 Controls for Chatswood, 4.3.1.

**Sun Access to Key Public Spaces**

**Key Element 19.** The sun access protection in Figure 5 will be incorporated into LEP controls, to ensure no additional overshadowing and protection in mid winter of:

- a) Victoria Avenue (between interchange and Archer St) 12pm - 2pm.
- b) Concourse Open Space 12pm - 2pm.
- c) Garden of Remembrance 12pm - 2pm.
- d) Tennis and croquet premises 12pm - 2pm.
- e) Chatswood Oval 11am - 2pm (which in turn also protects Chatswood Park).

In addition,

- f) Heights adjoining the South Chatswood Conservation Area will provide for a minimum 3 hours solar access between 9am and 3pm mid winter.

Comment

Consistent.

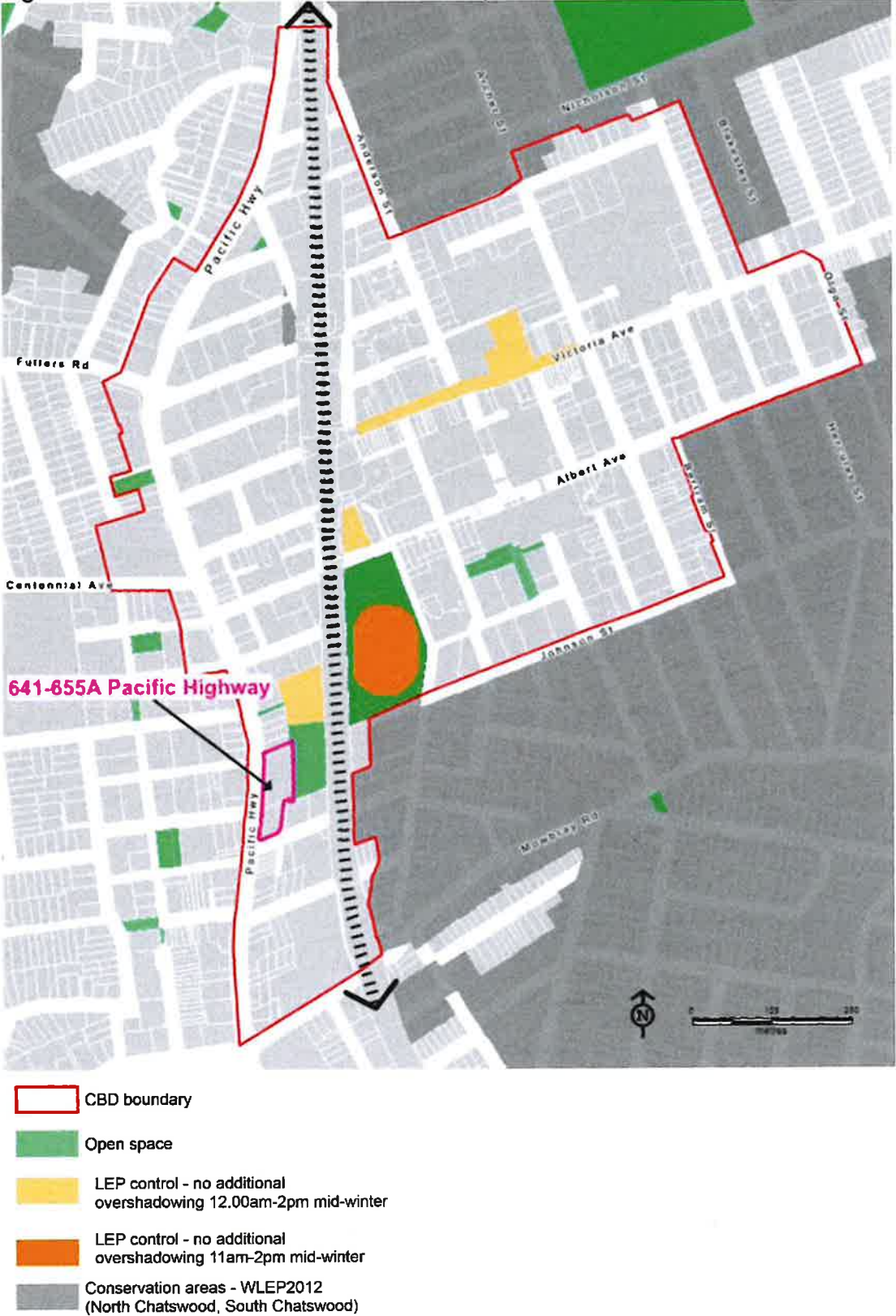
The subject site is located in the southern section of the Chatswood CBD, south of any public open space areas identified within the Chatswood CBD as requiring sun access protection, as shown below in **Figure 5 - Sun Access Protection**. It is outside of the area where additional height control is required to ensure sun access to the specified open space areas, as shown in **Figure 6 – Height**.

Overshadowing is further discussed below under Solar Access.



In WLEP 2012, sun access protection is addressed in the Sun Access Protection Map.

Figure 5 - Sun Access Protection for Public Spaces



## **Building Heights**

**Key Element 20.** Maximum height of buildings in the CBD will be based on Figure 6, based on context and up to the airspace limits (Pans Ops plane), except as reduced further to meet:

- a) Sun access protection.

Achievement of nominated height maximums will depend on addressing site constraints, surrounding context and other aspects of this Strategy in addition to satisfying SEPP 65 and Apartment Design Guidelines.

Comment  
Consistent.

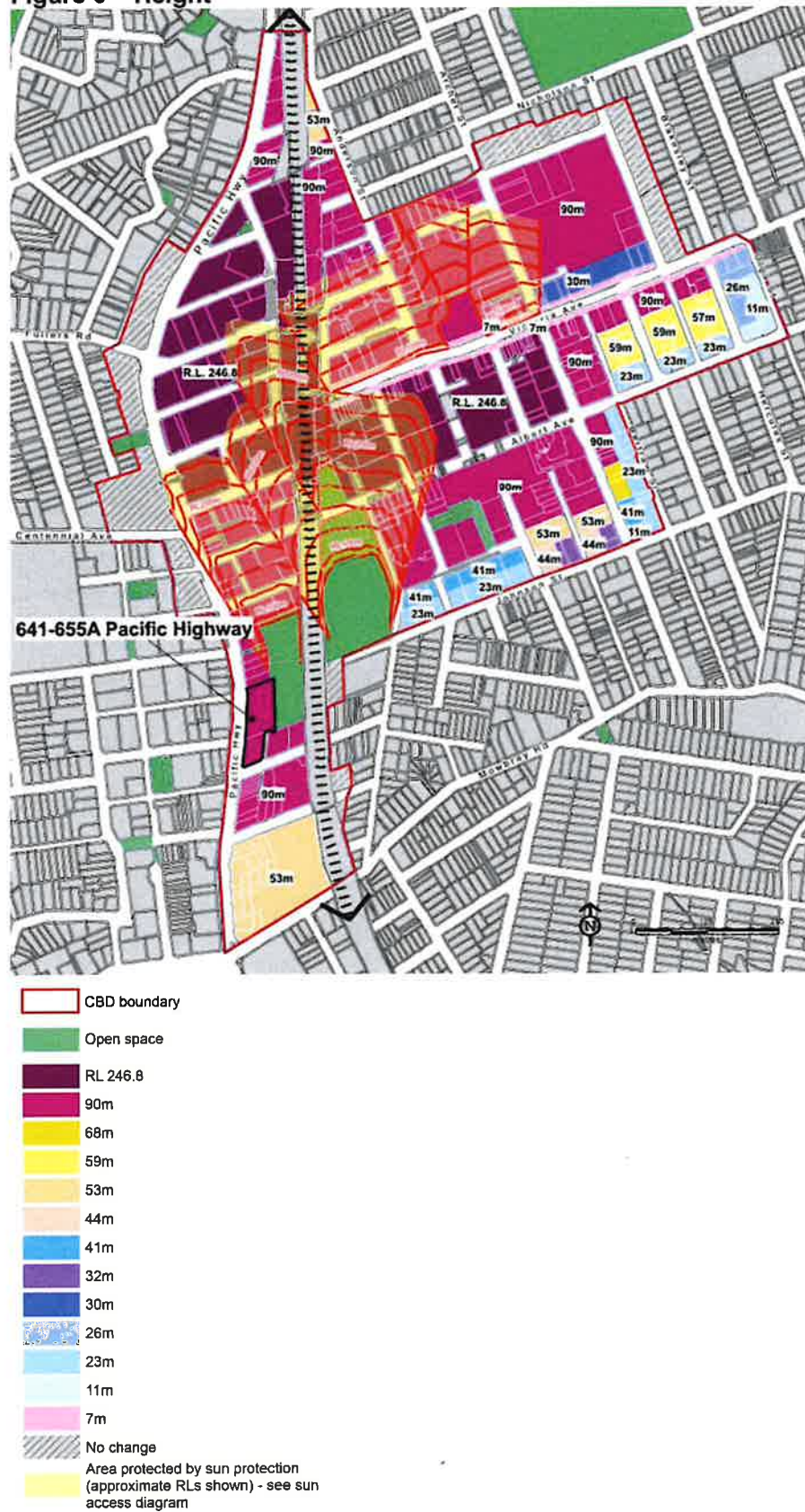
**Figure 6 – Height** below shows the height maximums in the Chatswood CBD, including where height is to be reduced in order to achieve sun access protection to the public open space areas identified in **Figure 5** (above).

The subject site is in a location with a height maximum of 90m.

The Planning Proposal proposes a maximum height of 90m, and is therefore consistent with the CBD Strategy.

Under WLEP 2012, height is addressed in Clause 4.3 and the Height of Buildings Map.

Figure 6 – Height



**Key Element 21.** All structures located at roof top level, including lift over runs and any other architectural features are to be:  
a) Within the height maximums.  
b) Integrated into the overall building form.

Comment  
Consistent.

The concept plans provided show two towers designed to contain all roof top structures within the height maximum of 90 metres.

Detailed plans, showing integration of roof top structures into the overall building form will be provided at development application stage.

Under WLEP 2012, height is addressed in Clause 4.3 and the Height of Buildings Map.

### **Links and Open Space**

**Key Element 22.** The links and open space plan in Figure 7 will form part of the DCP. All proposals should have regard to the potential on adjacent sites. Pedestrian and cycling linkages will be sought in order to improve existing access within and through the CBD.

New linkages may also be sought where these are considered to be of public benefit. All such links should be provided with public rights of access and designed with adequate width, sympathetic landscaping and passive surveillance.

Comment  
Consistent.

A 24 hour pedestrian and cycle through site link is identified as being required from Gordon Avenue, Hammond Lane, through the subject site, and on towards Ellis Street. This through site link goes past the Chatswood Bowling Club and key public space being the tennis courts and croquet greens (see **Figure 7 - Links and New Open Space** below).

It is considered the responsibility of the subject site to provide this through site link as far as its northern boundary – for future connections with other sites and the key public space.

The subject Planning Proposal provides:

- A through site link connecting Gordon Avenue with the subject sites northern boundary (3m wide).

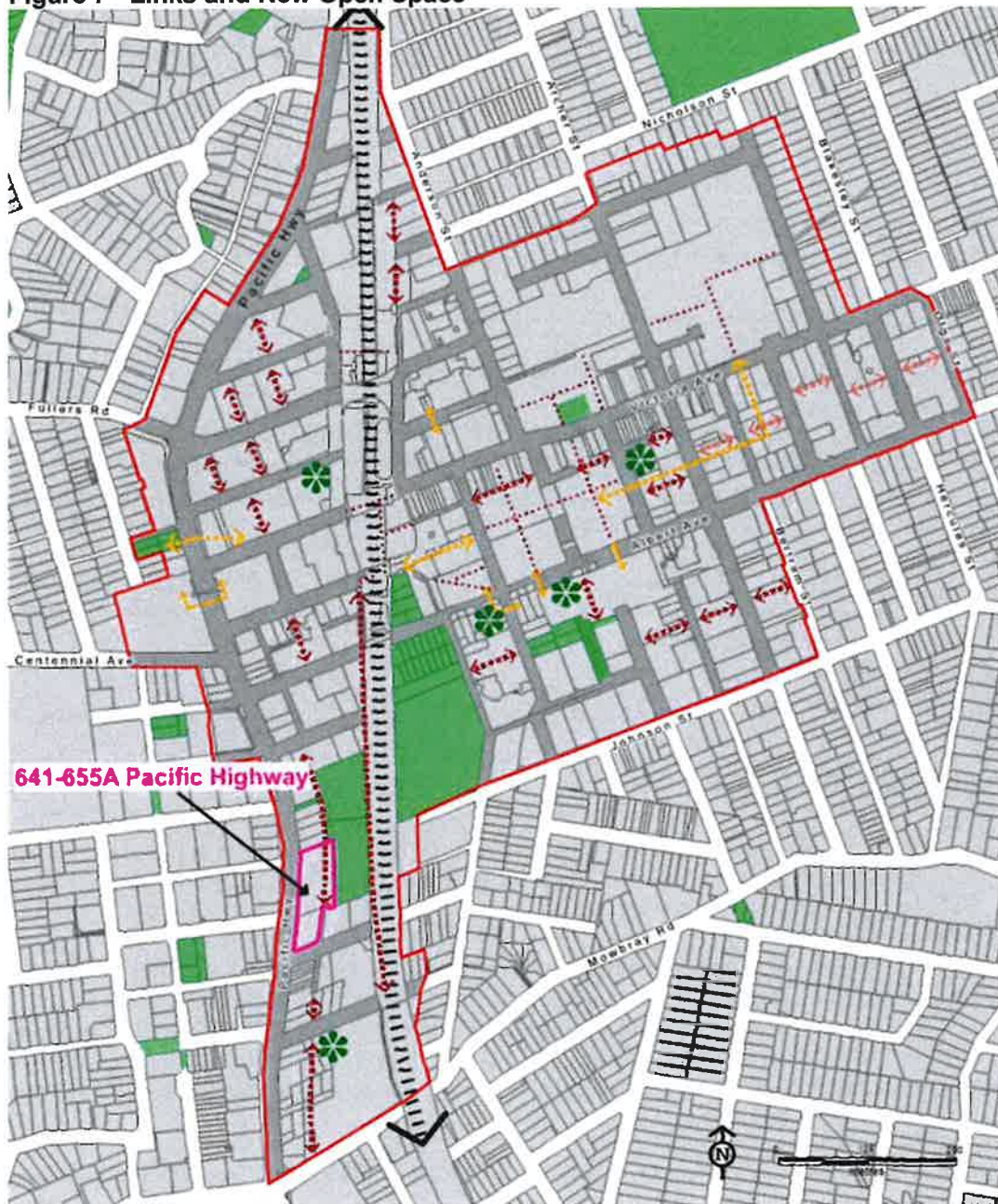
Additional linkages and public realm is discussed below.

The Planning Proposal satisfactorily addresses this Key Element.

Under WDCP, links and public realm are addressed in Part L, Section 4.3 Controls for Chatswood, 4.3.3.



**Figure 7 - Links and New Open Space**



- CBD boundary
- Open space
- ✱ New open space
- ↔ Open air 24 hour through-site links
- ↔ Open air 24 hour through-site links within block
- ⋯ Through-building links
- ↔ Existing upper storey links
- ↔ Proposed upper storey links
- Streets and public places

**Key Element 23. Any communal open space, with particular regard to roof top level on towers, should be designed to address issues of quality, safety and usability.**

Comment  
Consistent.

Communal open space has been provided within concept plans on the site, with particular regard to above the level 1 podium between the two towers and rooftop for each tower.

Under WDCP, podium and roof top communal open space is addressed in Part L, Section 4.2.

**Public realm or areas accessible by public on private land**

**Key Element 24. Public realm or areas accessible by public on private land:**

- a) Is expected from all B3 and B4 redeveloped sites.
- b) Is to be designed to respond to context and nearby public domain.
- c) Should be visible from the street and easily accessible.
- d) Depending on context, is to be accompanied by public rights of way or similar to achieve a permanent public benefit.

Comment  
Consistent.

The Planning Proposal proposes:

- A 24 hour publicly accessible north / south through site link connecting Gordon Avenue with the subject sites northern boundary (minimum 3m). In addition the ground area between each building and eastern site boundary is also proposed as a public right of way.
- A 4m publicly accessible setback along Pacific Highway to facilitate a shared pedestrian and cycle pathway along the western side of the Pacific Highway.
- A east / west publicly accessible through site precinct separating the two podiums, connecting the rear through site link and the Pacific Highway. This through site link is partly covered by the above podium level 1 communal open space linking both residential towers.

An additional east / west publicly accessible through site link is sought towards the northern boundary of the site.

The above is to be addressed in the development control plan provisions.

Under WDCP, public realm is addressed in Part L, Section 4.3 Controls for Chatswood, 4.3.3.

**Key Element 25. All roofs up to 30 metres from ground are to be green roofs. These are to provide a green contribution to the street and a balance of passive and active green spaces that maximise solar access.**

Comment  
Consistent.

Concept plans have been provided showing green roofs at podium level. This will be further addressed at development application stage.

Under WDCP, green roofs are addressed in Part L, Section 4.3 Controls for Chatswood, 4.3.2.

**Key Element 26. A minimum of 20% of the site is to be provided as soft landscaping, which may be located on Ground, Podium and roof top levels or green walls of buildings.**

Comment  
Consistent.

Soft landscaping has been provided above 20% of the site area.

Under WDCP, soft landscaping is addressed in Part L, Section 4.3 Controls for Chatswood, 4.3.2.

### **Setbacks and street frontage heights**

**Key Element 27. Street frontage heights and setbacks are to be provided based on Figure 8, which reflect requirements for different parts of the Chatswood CBD. With setbacks of 3 metres or more, including the Pacific Highway, deep soil planting for street trees is to be provided.**

- d) **Mixed use frontage with commercial Ground Floor**
  - i. **6-14 metre street wall height at front boundary.**
  - ii. **Minimum 3 metre setback above street wall.**
- e) **Pacific Highway frontage**
  - i. **Minimum 4 metre setback at Ground level from front boundary (with exception of heritage sites).**
  - ii. **Maximum 7 metre street wall height.**
  - iii. **Minimum 6 metre setback above street wall to tower.**

Comment  
Consistent.

The concept plans are consistent with the below **Figure 8 - Setbacks and street frontage heights** requirements applying to the subject site. For the purpose of this Key Element, the Mixed use frontage applies to Gordon Avenue and Hammond Lane.

The minimum requirements have been provided in the concept plans.

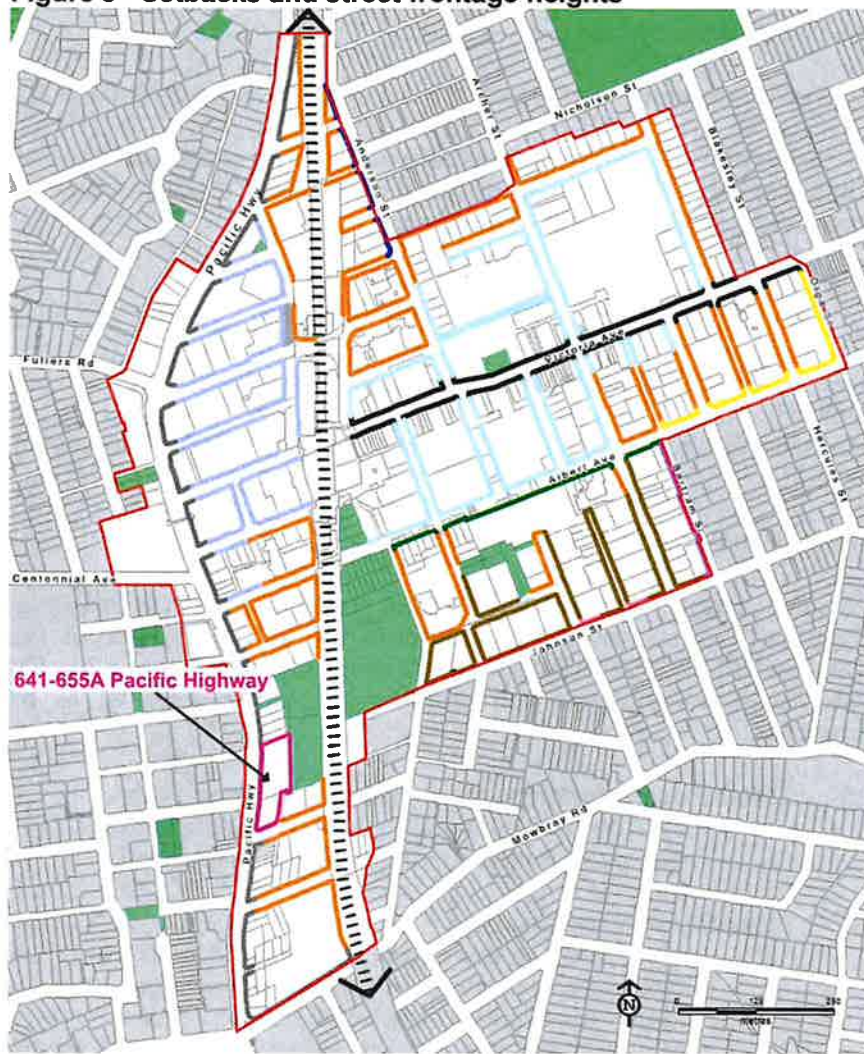
Setbacks above minimum requirements are supported and encouraged where possible.

Street wall heights below the maximum under the CBD Strategy, and in accordance with the envisioned number of storeys under the CBD Strategy, are supported.

Under WDCP, setbacks and street frontage heights are addressed in Part L, Section 4.3 Controls for Chatswood, 4.3.4.



**Figure 8 - Setbacks and street frontage heights**



- CBD boundary
- Open space
- Pacific Highway frontage
- Office Core frontage
- Urban Core
- Victoria Avenue retail frontage
- Albert Avenue South
- Southern Precinct
- Anderson Street Interface
- Johnson Street interface
- Bertam Street interface
- Albert Avenue north and Olga Street interface
- Mixed use frontage with commercial Ground Floor



**Key Element 28.** All towers above podiums in the B3 Commercial Core and B4 Mixed Use zones are to be setback from all boundaries a minimum of 1:20 ratio of the setback to building height.

This means if a building is:

- a) A total height of 30m, a minimum setback from the side boundary of 1.5m is required for the entire tower on any side.
- b) A total height of 60m, a minimum setback from the side boundary of 3m is required for the entire tower on any side.
- c) A total height of 90m, a minimum setback from the side boundary of 4.5m is required for the entire tower on any side.
- d) A total height of 120m, a minimum setback from the side boundary of 6m is required for the entire tower on any side.
- e) A total height of 150m, a minimum setback from the side boundary of 7.5m is required for the entire tower on any side.
- f) A total height of 160m, a minimum setback from the side boundary of 8m is required for the entire tower on any side.

The required setback will vary depending on height and is not to be based on setback averages but the full setback.

Comment

Consistent.

Key Element 28 is a general requirement for all new development within the Chatswood CBD. The proposed height of 90 metres requires a minimum 4.5 metre building setback from all boundaries for all towers above podiums.

Tower setbacks, for both towers, have been provided consistent with the Strategy.

Under WDCP, tower setbacks are addressed in Part L, Section 4.3 Controls for Chatswood, 4.3.4.

**Key Element 29.** Building separation to neighbouring buildings is to be:

- a) In accordance with the Apartment Design Guide for residential uses.
- b) A minimum of 6 metres from all boundaries for commercial uses above street wall height.

Comment

The Concept Plans address the required setbacks to neighbouring properties as outlined in this Key Element.

Under WDCP, building separation to neighbouring properties is addressed in Part L, Section 4.3 Controls for Chatswood, 4.3.3, c) and d).

**Active Street Frontages**

**Key Element 30.** At ground level, to achieve the vibrant CBD Council desires, buildings are to maximise active frontages.

**Particular emphasis is placed on the B3 Commercial Core zone. Blank walls are to be minimised and located away from key street locations.**

Comment  
Consistent.

The Concept Plans provided show non-residential floor space at Ground Level, and Levels 1 and 2, with the opportunity for active street frontages to the Pacific Highway, Gordon Avenue, Hammond Lane and the through site link.

This issue will be further assessed at development application stage.

Under WLEP 2012, active street frontages are addressed in the Active Street Frontages Map.

#### **Further Built Form Controls**

**Key Element 31.      Site Isolation will be discouraged and where unavoidable joined basements and zero-setback podiums should be provided.**

Comment  
Consistent.

This Key Element is satisfactorily addressed as the Planning Proposal involves the amalgamation of two large lots.

In regards the properties to the north (689-699 Pacific Highway), consistent with the Precinct Plan developed by Council in consultation with Transport for NSW, the opportunity exists for vehicle egress to be via the Pacific Highway – utilising the existing access on 655A Pacific Highway. The subject Planning Proposal retains this access – not for use by the subject site – but for use of 689-699 Pacific Highway.

Under WDCP, site isolation addressed in Part L, Section 4.3 Controls for Chatswood, 4.3.1, h).

**Key Element 32.      Controls will be applied to ensure the traditional lot pattern along Victoria Ave east (building widths of between 6-12m) is reflected into the future.**

Comment  
Not applicable.

**Key Element 33.      Floor space at Ground level is to be maximised, with supporting functions such as car parking, loading, garbage rooms, plant and other services located in Basement levels.**

Comment  
Consistent.

All car parking and loading as well as garbage provision for the site is shown in the concept plans as located within basement levels.

Services are shown as being provided within basement levels.

Under WDCP, maximising ground level floor space is addressed in Part L, Section 4.3 Controls for Chatswood, 4.3.1, c).

**Key Element 34. Substations are to be provided within buildings, not within the streets, open spaces or setbacks and not facing key active street frontages.**

Comment  
Consistent.

This Key Element will be further reviewed at development application stage.

Under WDCP, substations are addressed in Part L, Section 4.3 Controls for Chatswood, 4.3.1, i).

**Key Element 35. The CBD Strategy employs a Travel Demand Management approach seeking to modify travel decisions to achieve more desirable transport, social, economic and environmental objectives. A new CBD Transport Strategy will build on the approach.**

**In addition, site specific traffic and transport issues are to be addressed as follows:**

- a) Vehicle entry points to a site are to be rationalised to minimise streetscape impact, with one entry into and exiting a site. To achieve this objective loading docks, including garbage and residential removal trucks, are to be located within Basement areas.**
- b) In order to facilitate rationalisation of vehicle entry points on neighbouring sites, all development sites are to provide an opportunity within Basement levels to provide vehicle access to adjoining sites when they are developed.**
- c) All vehicles are to enter and exit a site in a forward direction. In this regard vehicle turntables should be provided where necessary.**
- d) All commercial and residential loading and unloading is required to occur on-site and not in public streets.**
- e) Car parking should be reduced by utilising RMS car parking rates for sites close to public transport, as well as reciprocal parking and car share strategies.**

Comment  
Consistent.

Pre-exhibition comments have been sought by Council officers and received from Transport for NSW due to the importance of transport related issues to both the individual Planning Proposal and the surrounding locality.

The Transport for NSW letter dated 9 March 2023 addressed a number of options, focused on reducing the number of existing access points to and from sites between 641 and 705 Pacific Highway, and thereby limiting impacts on the Pacific Highway.

Council officers supported a solution consistent with the Transport for NSW letter, and requested amended plans. An amended Planning Proposal was received.

An amended Traffic Impact Assessment, prepared by The Transport Planning has been submitted, concluding that the surrounding road network is able to accommodate the increased traffic from this proposal.

The Planning Proposal is considered to satisfactorily address this key Element for the purposes of Gateway consideration and exhibition:

- All car parking for the proposed development is located within the Basement levels (excluding 6 Chatswood Bowling Club car spaces to be provided at Ground level).
- All loading is accommodated off street and within basement levels.
- Loading vehicles are shown able to access and exit the site in a forward direction, with a physical manoeuvring solution provided within basement levels.
- A maximum of 310 car spaces are proposed in the concept plans. Car parking is required consistent with WDCP and car parking provision will be reviewed on this basis. This is addressed in the Officers recommendation.
- All vehicle access for the subject development and the Chatswood Bowling Club is via Hammond Lane.
- Consistent with the feedback from Transport for NSW, the retention of the existing access to the Pacific Highway is to be for the sole use of properties to the north, being 689-699 Pacific Highway. A right of way is proposed by the proponent. A physical barrier is also proposed to ensure traffic from the subject site, or any other site to the south, could not use this access to reach the Pacific Highway.

A Precinct Plan and draft Precinct DCP has been developed by Council to plan, manage and prepare for the future of transport in this Precinct. These documents are consistent with the Willoughby Integrated Transport Strategy 2036 and desired transport and transport related outcomes.

Additional information is required as follows:

- i. A Planning Report and Traffic Impact Assessment Report confirming, as relevant, that:
  - a) All car parking related to the Chatswood Bowling Club, currently located on 655A Pacific Highway, is located on the Planning Proposal site.
  - b) All car parking is to be in accordance with Willoughby Development Control Plan.
  - c) Access and egress is provided for croquet allocated car parking on the Chatswood Bowling Club site (being the subject of existing rights of way) via Hammond Lane.
- ii. An updated Traffic Impact Assessment Report providing more detailed analysis of traffic impacts: in Gordon Avenue, Orchard Road and Albert Venue, having regard to recently approved Planning Proposals responding to the Chatswood CBD Planning and Urban Design Strategy 2036.

.Amended plan requirements are outlined below in the Additional information required in Officers recommendation section.

Transport and parking will be further considered by Transport for NSW during exhibition and will be reviewed by Council post exhibition. In addition traffic and transport matters will be again reviewed at development application stage.

Under WDCP, vehicular access and loading / unloading facilities are addressed in Part L, Section 4.3 Controls for Chatswood, 4.3.1, f) and g).



## **Other Issues to be addressed**

### **Solar Access**

With regard to the built form being the subject of the Concept Plans, and impacts on surrounding properties, the shadow analysis provided by the proponent for 9am to 3pm, 21 June has been assessed as showing the following:

- At 9am, properties to the south west, in the direction of 598, 594, 586, a small part of 582 and 574 Pacific Highway, 4, 6 and part of 8-12 Sutherland Road, 2 Fehon Street, 1 Moriarty Road, part of 1 Whitton Road, and 12, 14, 16 and 18 Moriarty Road, are affected by additional overshadowing. Overshadowing does not cross the Pacific Highway.
- At 10am, 596, 594, part of 586, 582 and 574 Pacific Highway, and 4 Sutherland Road, are affected by additional overshadowing. The overshadowing crosses the Pacific Highway and impacts a small part of 637 Pacific Highway.
- At 11am, 629-637 and 613-627 Pacific Highway are affected by additional overshadowing. Overshadowing no longer crosses the Pacific Highway.
- At 12pm, 629-637 and 613-627 Pacific Highway, a small part of 10 Gordon Avenue and 19 Nelson Street, are affected by additional overshadowing.
- At 1pm, a small part of 629-637 Pacific Highway, 10 Gordon Avenue, 15, 17, and 19 Nelson Street, and a small part of 9-11 Nelson Street, are affected by additional overshadowing. A small part of the Metro Dive site, in the middle section, is also affected.
- At 2pm, a small corner of 629-637 Pacific, 10 Gordon Avenue, 15, 19, 9-11 Nelson Street, 5-9 Gordon Avenue and a small part of the Chatswood Bowling Club are affected by additional overshadowing. The north east corner of the Metro Dive site is also affected.
- At 3pm, a larger part of the Chatswood Bowling Club, 3, 5-9 Gordon Avenue, part of 10 Gordon Avenue and 9-11 Nelson Street are affected. A small part of the north eastern corner of the Metro Dive site is also affected. Overshadowing also crosses the North Shore Rail Line and impacts the rear part of 14, 12, 10, 8, 6, and 2 Orchard Road, and 2, 3 and 5 Berkeley Court.

The following conclusions can be made:

- At 11am, overshadowing no longer crosses the Pacific Highway to the western side.
- The Metro Dive site is affected to a minor degree from 1pm. The Individual Heritage Item (I96) on the Metro Dive site, being 339 Mowbray Road and located on the Mowbray Road frontage, is unaffected through the day.
- A small part of the South Chatswood Conservation is affected – being 2 Orchard Road (which is also an Individual Heritage Item (I105), 6, 8, 10, 12 and 14 Orchard Road. Additional overshadowing does not cross Orchard Road.
- Overshadowing to the South Chatswood Conservation does not conflict with the CBD Strategy requirement of a minimum 3 hours solar access between 9am and 3pm.
- Neighbouring properties are able to achieve the minimum 2 hour solar access requirement under the Apartment Design Guidelines and WDCP requirement of 3 hours of sunlight between 9am and 3pm mid-winter.

It is considered that the overshadowing from this Planning Proposal is reasonable for a site located within the Chatswood CBD.

Notwithstanding the above, more detailed and readable shadow diagrams are required if this Planning Proposal proceeds to Gateway and public exhibition. This has been addressed in the officer's recommendation.

Further consideration of overshadowing may occur following public exhibition and at development application stage.

### **Privacy and general amenity**

With regard to privacy and general amenity impacts to neighbouring properties, it is noted that:

- To the north, from 689 to 701 Pacific Highway, are single storey dwellings and three storey residential flat buildings. This land is part of the Chatswood CBD. A Planning Proposal has been lodged on 691-699 Pacific Highway.
- To the south, on the other side of Gordon Avenue, is 629-637 Pacific Highway – the subject of a Planning Proposal responding to the CBD Strategy, supported by Council and made (maximum height of 90m and FSR of 6:1). A Planning Proposal is being assessed for 10 Gordon Avenue and 15-19 Nelson Street (maximum height of 90m and FSR of 6:1). Another Planning Proposal at 9-11 Nelson Street, responding to the CBD Strategy, has been supported by Council and made (maximum height of 90m and FSR of 6:1).
- To the east is 5-9 Gordon Avenue – the subject of a Planning Proposal responding to the CBD Strategy, supported by Council and made (maximum height of 90m and FSR of 6:1).  
Also to the east is the Chatswood Bowling Club. The proponent has been in consultation with the Chatswood Bowling Club. Privacy and amenity concerns will be further considered following Gateway and public exhibition with regards to the Chatswood Bowling Club.
- To the west is the Pacific Highway, and on the opposite side, R3 Medium Density Residential land containing a mix of single storey houses and three storey residential flat buildings, outside of the Chatswood CBD.

Further consideration of amenity impacts such as privacy may occur following public exhibition of the Planning Proposal, and at the design excellence and development application stage.

### **Other Internal Referrals**

The Planning Proposal has also been referred to the Urban Design, Traffic, Engineering and Open Space sections of Council, and no objections have been raised.

The Engineering section made the following comment:

- The site is flood affected and tagged as affected by overland flow – major.
- Access to basement parking areas must be 500mm above the 1% AEP flood level or the PMF level adjacent to the crossing, whichever is higher.
- Floor levels are to be 500mm above the 1%AEP flood level.
- A Flood Impact Report in accordance with Technical Standard 3 will be required as part of the DA, to confirm that the above minimum flood levels are achieved and to confirm that the proposed works do not impact flood levels. A preliminary report should be considered at this stage, to confirm that the proposed building platform is clear of the overland flow path.

- The site will require OSD, and space for this needs to be included in any DA plans. Given the size of the system required, consideration should be given at this stage as to where the OSD tank will be located, ensuring that all impervious area can drain to the tank. The outlet level for the tank needs to be above the downstream 1% AEP flood level. Where connecting to a Council pit, the adopted level must be the grate level on the pit.

Preliminary floor analysis is required prior to gateway and exhibition and is addressed in the officer's recommendation.

### **Development Control Plan provisions**

Council has prepared draft site specific and precinct development control plan provisions.

These will be further assessed following public exhibition and may be the subject of amendments.

It is also noted that, where matters are not covered by site specific provisions, the remainder of the Development Control Plan will apply to the site.

### **Department of Planning and Environment Requirements**

The Planning Proposal is considered to be generally in accordance with the requirements under Section 3.33(2) of the *Environmental Planning and Assessment Act 1979* and the Department of Planning and Environment (August 2023) *Local Environmental Plan Making Guideline*. Refer to **Attachment 3**.

### **Willoughby Local Planning Panel**

The Willoughby Local Planning Panel has provided advice on this matter dated 14 November 2023 (Refer to **Attachment 8**). The issues considered included:

- Compliance with the strategic framework,
- Ground level public domain embellishment,
- Connection to a wider pedestrian and cycle network,
- Relationship of site with the Chatswood Bowling Club,
- Adequacy of the percentage of affordable housing to be provided,
- Precinct Plan and wider transport issues,
- Approach to vehicle access and egress,
- Traffic capacity of Gordon Avenue,
- Site access from the south, and
- Car parking and traffic generation.

The Panel *"advises it is satisfied that the planning proposal is worthy of being forwarded to the DP&E for a Gateway consideration having demonstrated strategic and site specific merit. The Panel notes that the plans and documentation provided have been superseded and are to include amendments to reflect recent changes to the Council planning controls. The Panel advises the Council that it supports forwarding the planning proposal to the DP&E for a Gateway consideration as set out in the Officer's report for the following reasons:*

- a) *The proposal is to be consistent with Council's CBD strategy public domain vision with regard to through site links and open space embellishment.*

- b) *The design of the podiums should be in accordance with the podium heights in the site specific development control plan, and involve stepping and articulation to address amenity considerations for through site links and open space and achieve design excellence.*
- c) *The non-residential areas adjoining through site links and open space areas are to be designed to create visual interest, amenity and pedestrian activity*
- d) *The design of the towers should consider location (with particular regard to key public spaces), articulation, potential shadow and achieve design excellence.*
- e) *All parking related to the development and the Chatswood Bowling Club to be located on-site.*
- f) *Vehicle access and egress involving the site is to be consistent with the Precinct Plan developed by Council in consultation with Transport for NSW. In this regard the existing Pacific Highway egress point on 655A Pacific Highway is not to be utilised by the subject site, is to be consistent with the Precinct Plan and therefore utilised solely by properties to the north via a right of way.*
- g) *The physical blocking of the internal vehicle access from Hammond Lane through to the Pacific Highway for 641-655A Pacific Highway is to involve measures that continue to invite pedestrian access to publicly accessible through site links and open space (cul-de-sac or similar and not barriers or gates)."*

#### **Additional information required in Officers recommendation**

##### **A) The following amended information:**

- i. A Planning Report and Traffic Impact Assessment Report confirming, as relevant, that:
  - a) All car parking related to the Chatswood Bowling Club, currently located on 655A Pacific Highway, is located on the Planning Proposal site.
  - b) All car parking is to be in accordance with Willoughby Development Control Plan.
  - c) Access and egress is provided for croquet allocated car parking on the Chatswood Bowling Club site (being the subject of existing rights of way) via Hammond Lane.
- ii. An updated Traffic Impact Assessment Report providing detailed analysis of traffic impacts in Gordon Avenue, Orchard Road and Albert Avenue, having regard to recently approved Planning Proposals responding to the Chatswood CBD Planning and Urban Design Strategy 2036.
- iii. Amended/additional plans showing:
  - a) All proposed setbacks, at ground and tower levels, clearly dimensioned.
  - b) All car spaces allocated to the Chatswood Bowling Club clearly identified on-site at ground and basement level.
  - c) Basement design to reflect reduced car parking provision in accordance with Willoughby Development Control Plan. Deep soil planting areas to be maximised, with appropriate landscaping.
  - d) Two east / west pedestrian through site links, as well as the north / south link, consistent with the site specific draft development control plan.

##### **B) Preliminary flood analysis responding to the overland flow issues identified by Council's engineers in the Detailed Assessment.**



- C) Detailed shadow diagrams at a readable scale for each hour between 9am and 3pm based on 21 June mid-winter, with each hour showing street names, the individual properties impacted (including addresses), analysis, patterns and conclusions. In addition, clear distinction is to be made between existing shadows and additional shadows from the proposed development.

## **Conclusion**

The Planning Proposal for a mixed use development at 641-653 and 655A Pacific Highway Chatswood, in the Chatswood CBD, is consistent with the strategic objectives of the *Greater Sydney Region Plan*, the *North District Plan* and Councils' *Local Strategic Planning Statement* (LSPS), as well as the *Chatswood CBD Planning and Urban Design Strategy 2036* (the CBD Strategy). It is considered that the relevant requirements under Section 3.33 of the *Environmental Planning and Assessment Act 1979* and the matters identified in the Department of Planning and Environment's *Local Environmental Plan Making Guideline* are adequately addressed and that the environmental impacts are acceptable for referral to Gateway and further consideration following public exhibition.

It should be noted that following exhibition and further assessment, amendments may be required.

Based on the above, it is recommended that Council forward the Planning Proposal to the Department of Planning and Environment, seeking a Gateway Determination under Section 3.34 of the *Environmental Planning and Assessment Act 1979*. It is further recommended that Council advise the Department of Planning and Environment that Council's Head of Planning be nominated as delegate to process and finalise the Planning Proposal.

The draft site specific and precinct development control plan provisions are satisfactory for the purposes of public exhibition and will be further reviewed post exhibition.

