

54-56 Anderson Street, Chatswood

Clause 4.6 Variation Report

Clause 4.3 Height of Buildings

Willoughby Local Environmental Plan 2023

ON BEHALF OF ANDERSON
CHATSWOOD DEVELOPMENT

November 2023

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1 Introduction

This Clause 4.6 Variation Request accompanies a development application (DA) for a mixed-use development at 54-56 Anderson Street, Chatswood (the site). The development proposes to vary the development standard for maximum building height pursuant to Clause 4.6 of the Willoughby Local Environmental Plan 2012 (WLEP).

The proposed building massing responds to the boundary between the 53m and 90m height limits that apply to the site. During the design competition process jurors suggested consideration of external louvres to provide passive shading of the northern façade of the 90m building.

This was strongly supported by the proponent but may lead to difficulties with the external operation of the louvres. To mitigate this concern, a 1m wide balcony is proposed between the louvres and the glass line to allow for manual operation of the screens. The 1m width is the minimum trafficable width allowable under the BCA.

While this results in the 90m tower element projecting approximately 1-1.6m into the 53m height limit, it does not increase the height of the building or result in any unreasonable impact in terms of view loss, overshadowing, visual impact or bulk and scale.

Furthermore, the intrusion does not result in an increase to the GFA of the building, will have a lightweight appearance and will significantly improve the thermal performance and amenity of the building.

This Clause 4.6 Variation Request demonstrates that compliance with the maximum height of building development standard is unreasonable and unnecessary in the circumstances of the case, and there are sufficient environmental planning grounds to justify the contravention.

2 Site Context

The subject site is known as 54-56 Anderson Street, Chatswood and legally described as SP 30740 and SP 11846 (**Figure 1**). The site comprises a total site area of approximately 2,216m² and is irregular in shape, with the site narrowing towards its northern end as the western boundary runs parallel to the adjacent North Shore Railway Line.

The site has three road frontages. The primary frontage is to the east to Anderson Street with secondary frontages to O'Brien Street (south) and Wilson Street (north).

The site is located approximately 550m north of the Chatswood Transport Interchange with access to metro, rail, and bus services and approximately 450m from the central retail / civic precinct of Chatswood.

The site contains two 1960's residential flat buildings, one of three-storeys (No. 54 Anderson Street) and one of two-storeys (No. 56 Anderson Street). Each of the residential flat buildings is on separate allotments, with separate vehicular access driveways.

East of the site on the opposite side of Anderson Street is the North Chatswood Heritage Conservation Area (HCA). The HCA is characterised as predominantly single storey detached Federation and Interwar residential developments. Low rise three-storey residential flat buildings predominate to the south and west of the site, with high rise apartment buildings located further to the southeast of the site.





Figure 1. Subject Site (outlined red)
Source: DPE



3 Development Standard to be varied (building height)

The development standard sought to be varied is the maximum building height standard identified for the site under Clause 4.3(2) of the WLEP.

Clause 4.3 Height of Buildings

Clause 4.3(2) of the WLEP specifies that the maximum building height for a building on any land is not to exceed the building height shown for the land on the Building Height Map.

4.3 Height of buildings

(1) ...

(2) *The height of a building on any land is not to exceed the maximum height shown for the land on the Height of Buildings Map.*

As shown in **Figure 2**, the WLEP Building Height Map prescribes two maximum building heights for the site:

- **53m** for 56 Anderson Street (northern lot)
- **90m** on 54 Anderson Street (southern lot)

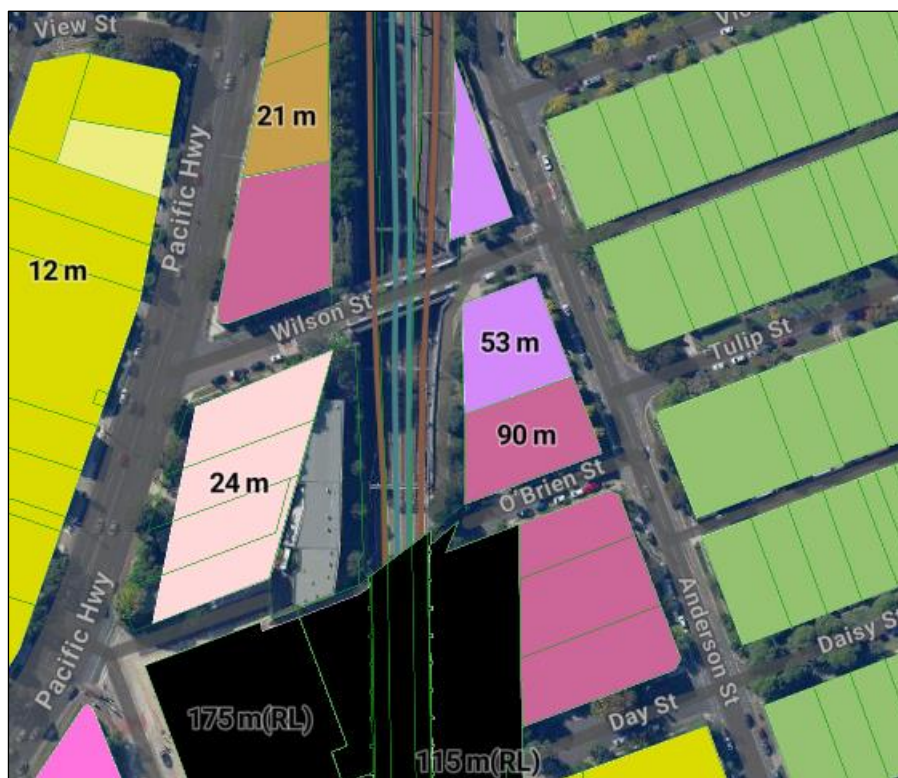


Figure 2. WLEP Building Height Map
Source: Mecone Mosaic



4 Extent of the variation sought

The development proposes to vary the building height through the provision of bronze, metal screen enclosed balconies to the upper northern façade of the southern tower element as shown in **Figures 3 & 4**. This is a 'horizontal projection' of the building façade from the southern 90m height plane into the northern 53m height plane.

The height exceedance relates to the 53m height limit where a maximum height of RL 191.817 is proposed. This equates to a 33.15m or 62.5% exceedance to the 53m building height limit.

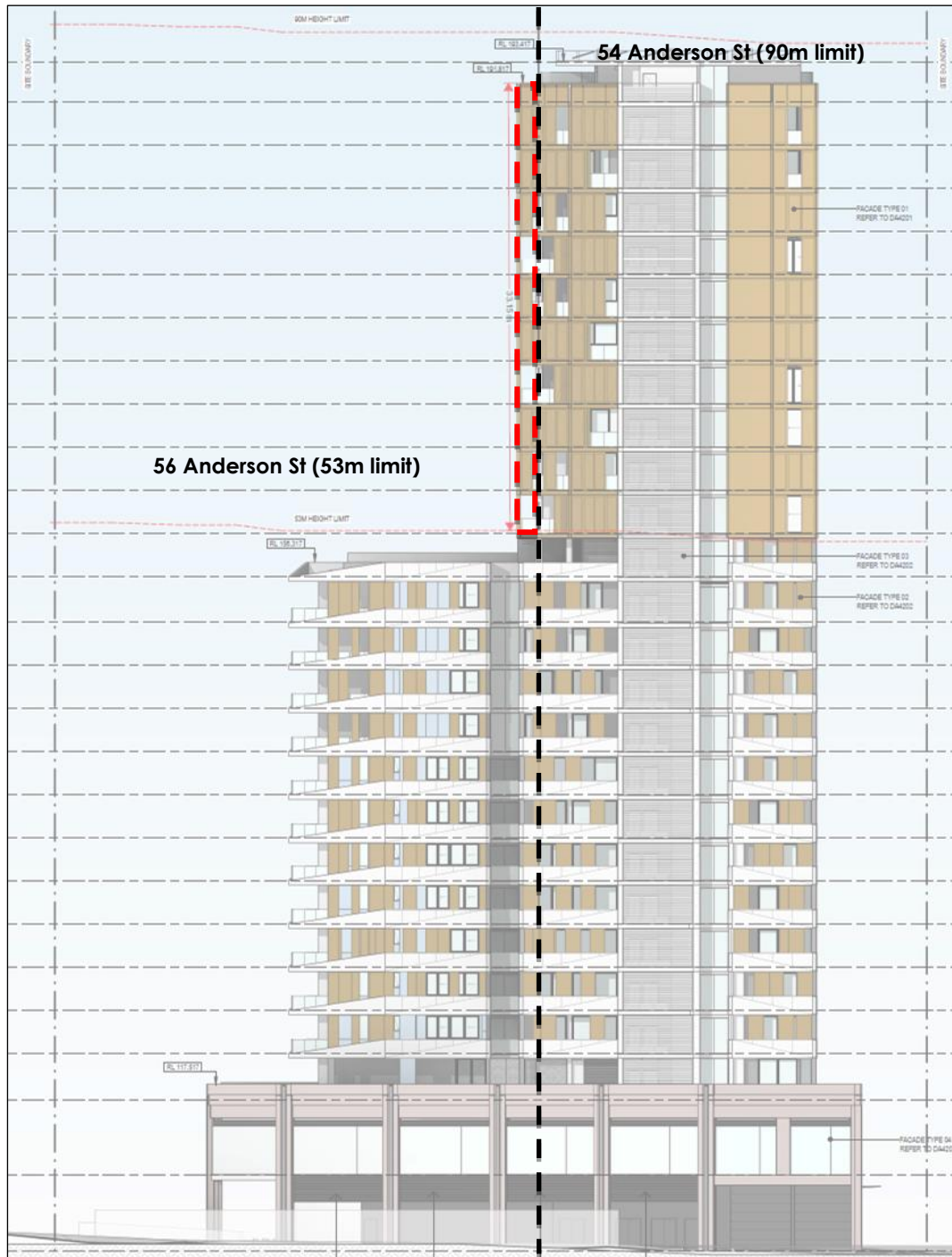


Figure 3. Western Building Elevation Extract – Area of Height Variation (identified in red)
Source: AJC (amended by Mecone)

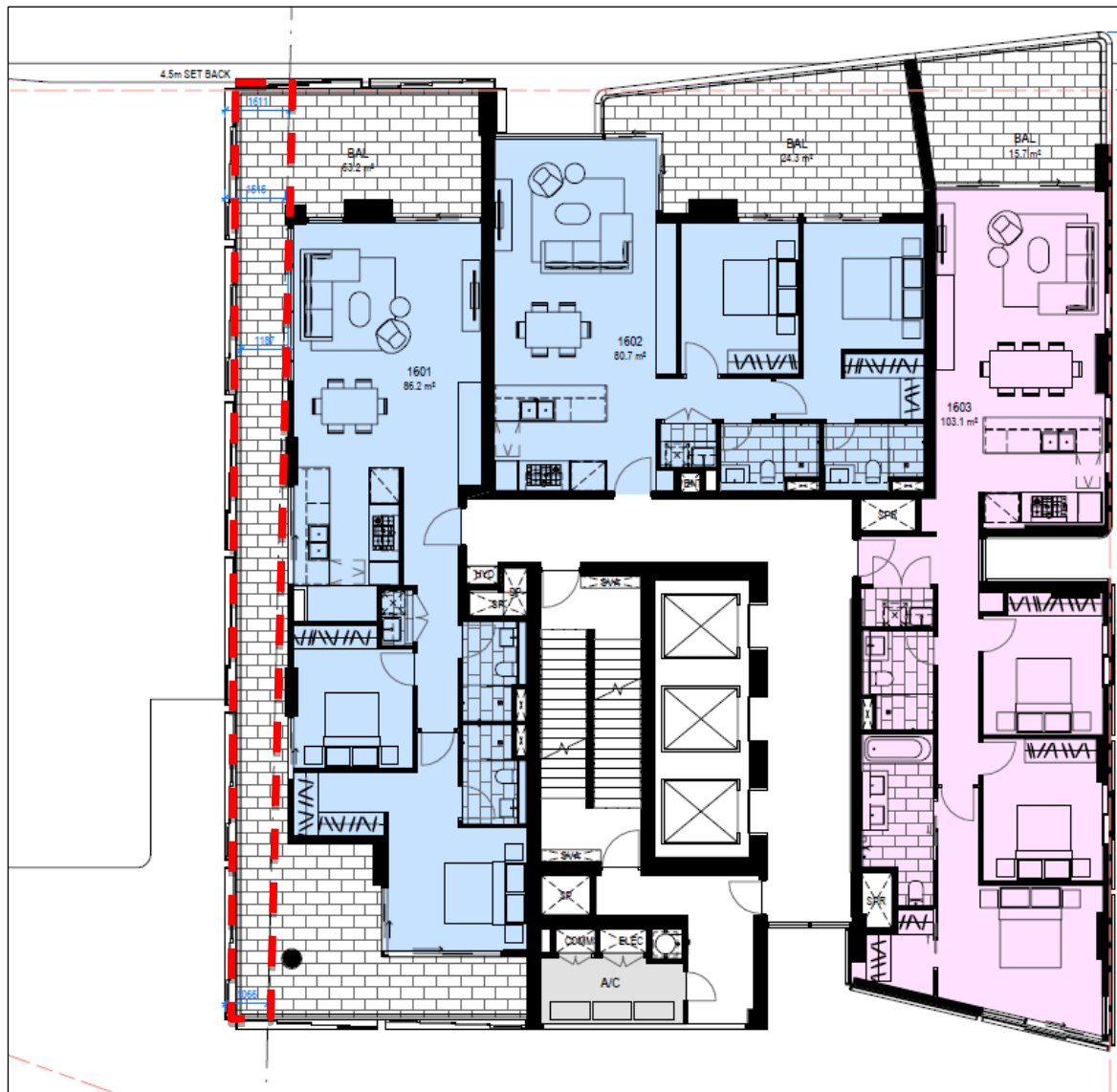


Figure 4. Typical Floor Plan Level 16 and above – Area of Height Variation (identified in red)
Source: AJC (amended by Mecone)

5 Clause 4.6 – Justification for Contravention of the Development Standard

The objectives of clause 4.6 are:

- (a) to provide an **appropriate degree of flexibility** in applying certain development standards to particular development,
- (b) to achieve **better outcomes** for and from development by allowing flexibility in particular circumstances.

Clause 4.6(3) provides that consent must not be granted to contravene a standard unless a written request justifies that:

(a) that compliance with the development standard is unreasonable or unnecessary in the circumstances of the cases, and

(b) that there are sufficient environmental planning grounds to justify contravening the development standard.

5.1 Clause 4.6 (3)(a) Compliance with the development standard is unreasonable or unnecessary in the circumstances of the case

In *Wehbe*, Preston CJ of the Land and Environment Court provided relevant assistance by identifying five traditional ways in which a variation to a development standard had been shown as unreasonable or unnecessary. However, it was not suggested that the types of ways were a closed class.

While *Wehbe* related to objections made pursuant to *State Environmental Planning Policy No. 1 – Development Standards* (SEPP 1), the analysis can be of assistance to variations made under clause 4.6 where subclause 4.6(3)(a) uses the same language as clause 6 of SEPP 1 (see *Four2Five* at [61] and [62]).

As the language used in subclause 4.6(3)(a) of WLEP is the same as the language used in clause 6 of SEPP 1, the principles contained in *Wehbe* are of assistance to this clause 4.6 variation request. The five methods outlined in *Wehbe* include:

- *The objectives of the standard are achieved notwithstanding non-compliance with the standard (First Method).*
- *The underlying objective or purpose of the standard is not relevant to the development and therefore compliance is unnecessary (Second Method).*
- *The underlying object or purpose would be defeated or thwarted if compliance was required and therefore compliance is unreasonable (Third Method).*
- *The development standard has been virtually abandoned or destroyed by the Council's own actions in granting consents departing from the standard and hence compliance with the standard is unnecessary and unreasonable (Fourth Method).*
- *The zoning of the particular land is unreasonable or inappropriate so that a development standard appropriate for that zoning is also unreasonable and unnecessary as it applies to the land and compliance with the standard would be unreasonable or unnecessary. That is, the particular parcel of land should not have been included in the particular zone (Fifth Method).*

In this instance, we rely on the 'First Method':

1. "The objectives of the standard are achieved notwithstanding non-compliance with the standard"

The stated objectives of the Height of Buildings development standard (cl. 4.3) are:



- (a) to ensure that new development is in harmony with the **bulk and scale** of surrounding buildings and the streetscape
- (b) to minimise the impacts of new development on adjoining or nearby properties from disruption of views, loss of privacy, overshadowing or visual intrusion
- (c) to ensure a **high visual quality** of the development when viewed from adjoining properties, the street, waterways, public reserves or foreshores
- (d) to minimise **disruption to existing views** or to achieve reasonable view sharing from adjacent developments or from public open spaces with the height and bulk of the development
- (e) to set upper limits for the height of buildings that are **consistent with the redevelopment potential** of the relevant land given other development restrictions, such as floor space and landscaping
- (f) to use maximum height limits to assist in responding to the current and **desired future character** of the locality
- (g) to reinforce the primary character and land use of the city centre of Chatswood with the area west of the North Shore Rail Line, being the commercial office core of Chatswood, and the area east of the North Shore Rail Line, being the retail shopping core of Chatswood
- (h) to achieve **transitions in building scale** from higher intensity business and retail centres to surrounding residential areas
(our emphasis)

The above objectives are address as follows:

Objective (a) to ensure that new development is in harmony with the bulk and scale of surrounding buildings and the streetscape

Scale is a term used as a comparative between different buildings. In this regard, the volume of the building is what could be reasonably expected by the planning controls and is largely consistent with the prevailing building forms. Therefore, while the proposal exceeds the height control, the scale of the building (as it will be relative to future development on surrounding sites) will be that which is envisaged by the controls.

The building is well designed and has been massed on the site in a way that responds to surrounding development and the prevailing and desired future character.

The proposed additional height provides a built form outcome that does not result in any perceptible increase in bulk or scale when viewed from the public domain or surrounding properties. The additional height will be accommodated within the northern vertical façade element of the building, providing an overall scheme with an improved design quality.

The building will be consistent with the envisaged streetscape of Anderson, Wilson and O'Brien Streets, as well as compatible with the desired future character of the locality as intended under the Chatswood CBD Strategy 2036 (the Strategy). In this respect, the Strategy envisions the locality as a major centre which will accommodate a greater diversity of housing and mix of uses, including increased density in terms of building height and FSR.

As such, the additional building height to facilitate sun shade screens will not contribute to an unacceptable built form outcome and will remain consistent with the desired character of the locality. The objective is achieved notwithstanding the non-compliance.

Objective (b) to minimise the impacts of new development on adjoining or nearby properties from disruption of views, loss of privacy, overshadowing or visual intrusion

The proposed height exceedance results from a 1-1.6m projection of the upper northern façade of the southern tower element to the north into the 53m height plane.

The variation to building height will not be perceivable from the street by virtue of the split height planes over the site which seek to achieve a stepped down building form to the north.

As demonstrated in the shadow diagrams provided in the amended Architectural Plans, additional overshadowing as a result of the variation is negligible, and the variation will not give rise to loss of privacy or visual intrude upon adjoining or nearby properties. Further, with respect to overshadowing impacts to properties to the southwest, we note tower has been located to the eastern part of the



site which minimises overshadowing (maximising solar access) to properties to the southwest; compared with tower overshadowing when located at the minimum permitted western setbacks under site-specific DCP.

Objective (c) to ensure a high visual quality of the development when viewed from adjoining properties, the street, waterways, public reserves or foreshores

The split height limit over the site seeks to achieve a step down in building form and height to the north. The delineation of the two height limits over the site is consistent with the two existing lots which are being consolidated under this DA. Therefore, the line of delineation between the two building height limits is somewhat arbitrary when considering a combined mixed use development of the whole site.

The variation to building height will not minimise the quality of the building, rather will considerably add value to the visual design quality of the overall proposal on site. As noted in the Architectural Design Competition Report (SEE Appendix 28), the Jury considered this non-compliance to height of building development standard, whilst not essential to achieve design excellence, would provide for an improved design quality of the scheme.

The proposed additional building height will ensure a high visual quality of the development when viewed from adjoining properties, the street, waterways, public reserves or foreshores.

Objective (d) to minimise disruption to existing views or to achieve reasonable view sharing from adjacent developments or from public open spaces with the height and bulk of the development

The proposed additional height will result in a built form outcome that maintains views sharing from adjacent developments as otherwise seen from a compliant building height development on site. As aforementioned, the height variation results from the 1-1.6m 'horizontal projection' of the building façade from the southern 90m height plane into the northern 53m height plane for the provision of sun shading design features. Therefore, this 1-1.6m horizontal projection to the north would produce negligible (if any) disruption of existing views. The objective is considered achieved notwithstanding the non-compliance.

Objective (e) to set upper limits for the height of buildings that are consistent with the redevelopment potential of the relevant land given other development restrictions, such as floor space and landscaping

The additional building height resulting from the provision of balconies and does not consist of habitable floor area. Further, the variation to the building height development standard will have no bearing on the site's restrictions such as the provision of gross floor area or landscaping for the site.

Accordingly, the objective is considered to be achieved notwithstanding the non-compliance.

Objective (f) to use maximum height limits to assist in responding to the current and desired future character of the locality

The current character of the area can be described as a juxtaposition between high-density Chatswood CBD tower development and lower scale heritage conservation area to the east.

Willoughby City Council's Chatswood CBD Planning and Urban Design Strategy 2016 (CBD Strategy) represents Council's 20-year development and land use vision for the future of the Chatswood CBD. The strategy was intended to inform strategic merit assessments for site specific planning proposals and to align Council's strategic planning including its LSPS, LHS and comprehensive LEP amendment with the actions and priorities of the North District Plan. It is therefore considered that the CBD Strategy outlines the desired future character of the locality.

The CBD Strategy' recommendations for the site informed the recent site-specific planning proposal that increased the site's building height and FSR for the site along with the implementation of a site-specific DCP consistent with the strategy's recommendations. This included a stepped building height from 90m at 54 Anderson St (site's southern portion) down to 53m for 56 Anderson St (site's northern portion).

The proposed variation allows for a better design quality outcome on the site for a development which serves as a stepped built-form transition between the CBD and surrounding residential and



heritage conservation areas. Requiring strict compliance with the height of building standard would result in a poorer design quality outcome onsite.

Notwithstanding the height variation, the development responds to the current and desired future character of the locality.

Objective (g) to reinforce the primary character and land use of the city centre of Chatswood with the area west of the North Shore Rail Line, being the commercial office core of Chatswood, and the area east of the North Shore Rail Line, being the retail shopping core of Chatswood

Whilst not directly relevant to the site being in the CBD's northern extent, the proposed development is not inconsistent with this objective.

Objective (h) to achieve transitions in building scale from higher intensity business and retail centres to surrounding residential areas

Notwithstanding the height variation through a minor imperceivable horizontal tower protrusion wholly contained within the site, the development still achieves the desired transition in building scale from the higher-density Chatswood CBD to surrounding low-rise residential development as envisaged by the height mapping (being a step in the building scale from 90m to 53m within the site). As discussed at Objectives (c) and (f) and achieved through the architectural design competition process, the proposed additional height of building will provide a development that achieves a better architectural design quality while allowing for the desired transition in building scale. The proposal is consistent with this objective.

5.2 Clause 4.6 (3)(b) – Are there sufficient environmental planning grounds to justify contravening the development standard?

The proposed building massing responds to the boundary between the 53m and 90m height limits that apply to the site. During the design competition process jurors suggested consideration of external louvres to provide passive shading of the northern façade of the 90m building.

This was strongly supported by the proponent but may lead to difficulties with the external operation of the louvres. To mitigate this concern, a 1m wide balcony is proposed between the louvres and the glass line to allow for manual operation of the screens. The 1m width is the minimum trafficable width allowable under the BCA.

While this results in the 90m tower element projecting approximately 1-1.6m into the 53m height limit, it does not increase the height of the building or result in any unreasonable impact in terms of view loss, overshadowing, visual impact or bulk and scale.

Furthermore, the intrusion does not result in an increase to the GFA of the building, will have a lightweight appearance and will significantly improve the thermal performance and amenity of the building.

These matters are discussed in further detail below.

Gross Floor Area & Building Code of Australia

As shown in **Figure 4**, the height variation does not result in additional gross floor area for the development, rather enables the provision of sun shading structures to the upper northern façade to better shade apartments from the northern sun. The trafficable balcony, which is required to be 1m minimum width to meet the BCA, allows for these sun shading devices to be manually operated for residents to manage proliferation of sunlight into upper-level apartments.

Apartment Design Guide

As shown in **Figure 5**, the provision of these sun shading devices is consistent with Objective 4A-3 of the Apartment Design Guide (ADG) which seeks designs that incorporate shading and glare control, particularly for warmer months. With reference to the design guidance, the height variation directly allows for:

- balconies or sun shading that extend far enough to shade summer sun, but allow winter



sun to penetrate living areas

- shading devices such as balconies and louvres
- horizontal shading to north facing windows
- operable shading to allow adjustment and choice

Objective 4A-3

Design incorporates shading and glare control, particularly for warmer months

Design guidance

A number of the following design features are used:

- balconies or sun shading that extend far enough to shade summer sun, but allow winter sun to penetrate living areas
- shading devices such as eaves, awnings, balconies, pergolas, external louvres and planting
- horizontal shading to north facing windows
- vertical shading to east and particularly west facing windows
- operable shading to allow adjustment and choice
- high performance glass that minimises external glare off windows, with consideration given to reduced tint glass or glass with a reflectance level below 20% (reflective films are avoided)

Figure 5. Apartment Design Guide – Objective 4A-3

Source: DPE

Energy Efficiency

The provision of sunshades to the upper northern façade enables a more energy efficiency design to be incorporated into the development, reducing reliance on mechanical heating and cooling, achieving a more ecologically sustainable design outcome for the development.

Architectural Design Quality

As aforementioned, the variation to building height results in a better architectural design quality outcome for the development compared to a strictly compliant form. The proposed height variation was considered by the jury during the Architectural Design Competition (ADC) as outlined in the Architectural Design Competition Report (**SEE Appendix 28**). Specifically, in section 6.2 of the report, the AJC's competition winning scheme and potential variations to planning controls were addressed as follows:

"It was acknowledged that the supplementary scheme included the following variations to planning controls:

- ***The bronze metal screen enclosed balconies to the upper northern façade project from the southern tower element (subject to a 90m height limit) over the northern tower element subject to a 53m height limit, resulting in an exceedance to LEP building height standard applicable to the northern portion of the site. Whilst it was noted that these external elements did not comprise habitable floor area, they would technically necessitate a Clause 4.6 variation to the height standard.***
- *A portion of balconies on the south-eastern corner of the building protruded into the 4.5m site specific DCP setback required to Anderson Street for the 90m southern tower portion of the building.*
- *It was unclear whether a portion of balconies on the north-eastern corner of the building protruded into the 4.0m setback required to Anderson Street for the 53m northern portion of the building.*



AJ+C clarified that:

- *The bronze screen enclosed balconies could be deleted and the screens fixed directly to the exterior of the façade in compliance with the height standard.*
- *Both encroachments into the eastern tower setback DCP control could be reduced or removed, by flattening the eastern façade (completely at the south, marginally at the north)*

The jury concluded that while an amended compliant scheme would still achieve design excellence, the design quality of the scheme would be improved by the above non-compliances, noting that it is preferred for the current eastern façade modelling to be maintained, whilst complying with the required eastern setback.”

(emphasis added)

As shown above, it was acknowledged that the bronze metal screen enclosed balconies to the upper northern façade projecting from the southern tower element (subject to a 90m height limit) over the northern tower element subject to a 53m height limit, would technically necessitate a Clause 4.6 variation to the height standard. Notwithstanding, the jury concluded that while an amended compliant scheme would still achieve design excellence, the design quality of the scheme would be improved by the height non-compliance.

Overshadowing

The upper northern building facade which causes the building height contravention has been skilfully designed and will not give rise to any unacceptable overshadowing impacts to surrounding properties as demonstrated in the shadow diagrams provided in the Architectural Plans.



6 Clause 4.6 (4)(a)(ii) – The proposed development will be in the public interest because it is consistent with the objectives of the particular standard and the objectives for development within the zone in which the development is proposed to be carried out

6.1 Consistency with objectives of the development standard

The proposed development is consistent with the objectives of the height of buildings development standard as discussed in **Section 6.3** of this variation request.

6.2 Consistency with the objectives of the B4 Mixed Use zone

The site is located within the B4 Mixed Use zone. As outlined below, the proposed development is in the public interest because it is consistent with the following objectives of the zone:

- *To provide a mixture of compatible land uses.*
- *To integrate suitable business, office, residential, retail and other development in accessible locations so as to maximise public transport patronage and encourage walking and cycling.*
- *To allow for city living on the edges of the city centre of Chatswood, which supports public transport use, shopping, business and recreational services that contribute to the vitality of the centre, without undermining its commercial role.*

These objectives are addressed as follows:

To provide a mixture of compatible land uses.

The proposed development provides for a mixed-used development along Anderson Street which includes residential, commercial and retail uses and will complement the Chatswood CBD land uses and surrounding land uses in the locality.

It will also ensure new businesses along Anderson Street are provided for the needs of the existing and future locality.

In accordance with the Site-Specific DCP and Chatswood CBD Strategy, the proposal offers a development that is consistent with the desired future character on site and will provide for the needs for additional residential and commercial land uses within the locality.

The proposed variation to the height of buildings standard does not in any way restrict the development from satisfying this objective.

To integrate suitable business, office, residential, retail and other development in accessible locations so as to maximise public transport patronage and encourage walking and cycling.

The proposed development is located in a highly accessible location, approximately 500m north of Chatswood Train Station which offers diverse public transport modality to Greater Sydney. The proposal is situated to ensure residents and employees utilise nearby public transport as well as walking and cycling for their main transport mode.

The proposed variation to the height of building development standard does not in any way restrict the development from satisfying this objective.

To allow for city living on the edges of the city centre of Chatswood, which supports public transport use, shopping, business and recreational services that contribute to the vitality of



the centre, without undermining its commercial role.

The proposed development offers a mixed-used building providing residential, commercial and retail land uses which will support and increase the use of nearby services (public transport, businesses, recreational services, etc.).

Further, the proposal will complement and promote the commercial role of Chatswood CBD by providing additional commercial land uses within the locality, as well as increasing the use of its commercial component.

The proposed variation to the height of building development standard does not in any way restrict the development from satisfying this objective.



7 Planning Secretary's Concurrence

Under Clause 4.6(5) of the WLEP 2012, the Secretary's concurrence is required prior to granting consent to a variation.

Planning Circular PS 20-002, issued on 5 May 2020 (the Planning Circular), outlines arrangements for when the Secretary's concurrence to vary development standards may be assumed. The Planning Circular establishes that all consent authorities may assume the Secretary's concurrence under Clause 4.6 of the *Standard Instrument (Local Environmental Plans) Order 2006* with exceptions relating to:

- lot size standards for dwellings in rural areas, and
- numerical and non-numerical development standards.

The proposed development is deemed 'regionally significant development' pursuant to *State Environmental Planning Policy (Planning Systems) 2021*. With respect to regionally significant development Planning Circular PS 20-002 specifies:

Sydney district and regional planning panels may also assume the Secretary's concurrence where development standards will be contravened.

The restriction on delegates determining applications involving numerical or non-numerical standards does not apply to all regionally significant development. This is because all regionally significant development is determined by a panel and is not delegated to council staff.

However, the restriction on assuming concurrence to vary lot size standards for dwellings in rural areas will continue to apply to regionally significant development. The Secretary's concurrence will need to be obtained for these proposals in the same way as it would for local development.

(emphasis added)

As above, the restriction relating to non-numerical development standards does not apply to regionally significant developments and therefore the Secretary's concurrence may be assumed by the regional planning panel who is the consent authority for the development application.

7.1 Clause 4.6(5)(a): Any Matters of Significance for State or Regional Environmental Planning

The contravention of the height of buildings development standard does not raise any matter of State or regional planning significance. The proposed variation will not contravene any overarching State or regional objectives or standards.

7.2 Clause 4.6(5)(b): Any Public Benefit of Maintaining the Development Standard

There is no public benefit in maintaining the development standard. As addressed in this variation request, the proposal responds to the surrounding urban context as well as the desired future character for the area.

The proposal will cater for the needs and demand for mixed-use development, maintaining a density consistent with that envisaged for the site under the planning framework; and maintain an intensity of development that is commensurate with the capacity of existing and planned infrastructure.

Strict compliance with the height of buildings development standard would affect public benefits of the proposal including a better architectural design quality outcome and a more energy efficient and ecologically sustainable development.



7.3 Clause 4.6(5)(b): Other Matters Required to be Taken into Consideration Before Granting Concurrence

Other than those identified above, there are no further matters that the Secretary (or Consent Authority under delegation) must consider before granting concurrence.



8 Conclusion

This written request is for a variation to the minimum non-residential floor space development standard under Clause 4.6 of WLEP 2012. The request justifies the contravention of the development standard in the terms required under Clause 4.6 of WLEP 2012.

This written request to vary the development standard demonstrates that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case, as the development is consistent with the objectives of the building height control in that the development:

- is in harmony with the bulk and scale of surrounding buildings and the streetscape,
- will not result in any unreasonable disruption of views, loss of privacy, overshadowing or visual intrusion,
- will provide for a high visual quality of the development when viewed from adjoining properties, the street, waterways, public reserves or foreshores,
- will achieve reasonable view sharing from adjacent developments.
- will provide for a height of building that is consistent with the redevelopment potential of the relevant land given other development restrictions, such as floor space and landscaping,
- will respond to the current and desired future character of the locality,
- will achieve a more rational transition in building scale from higher intensity business and retail centres to surrounding residential areas.

This request demonstrates that there are sufficient environmental planning grounds to justify the contravention as it is:

- solely for the provision of external louvres and to allow for their manual operation,
- it does not increase the height of the building or result in any unreasonable impact in terms of view loss, overshadowing, visual impact or bulk and scale,
- the intrusion does not result in an increase to the GFA of the building, will have a lightweight appearance and will significantly improve the thermal performance and amenity of the building.

The proposed development is consistent with the zone objectives, providing a mixture of compatible uses in the Chatswood CBD, maximising public transport patronage and active modes of transport whilst supporting the vitality of the centre, without undermining its commercial role.

The proposed development is in the public interest as it is consistent with:

- the objectives of the B4 Mixed Use zone
- the objectives of the building height development standard

The concurrence of the Planning Secretary's concurrence may be assumed by the Sydney North Planning Panel pursuant to Planning Circular PS 20-002.

There are no matters of State or regional planning significance that arise and no public benefit in maintaining the development standard in this case.

