



Mr David Furlong  
Acting Chair  
Sydney East Joint Regional Planning Panel  
c/o – JRPP Secretariat  
23-33 Bridge Street  
SYDNEY NSW 2000

16/07353

Attention: [stuart.withington@planning.nsw.gov.au](mailto:stuart.withington@planning.nsw.gov.au)

Dear Mr Furlong

**Additional information – Pre-Gateway Review – 815 Pacific Highway, Chatswood**

I refer to your request for comments on the additional information submitted by the proponent in relation to a pre-gateway review request for 815 Pacific Highway, Chatswood (the site). I note the additional information is in response to a record of the Panel's meeting on 5 April 2016.

The following comments addressing the additional information sought regarding the proponent's analysis of the 'broader precinct' along Help Street, Chatswood is outlined below.

In summary, it is considered that the proponent has only partially addressed the majority of the considerations recommended by the Panel.

Zoning and Land use – partially addressed

- Pages 6 and 7 notes the existing zoning and context, noting a number of existing residential developments in the B3 Commercial Core zone of Chatswood CBD.
- Page 22 shows the proposed uses/ zoning for the broader precinct.
- The proponent considers a B4 Mixed Use zone appropriate for the broader precinct.
- All sites would have a podium level for commercial/active uses with commercial or residential towers interspersed depending on design impacts.
- Four sites within the broader precinct are shown as being proposed for purely commercial development, while six would be mixed commercial/ residential.
- Two sites containing residential strata development have been excluded from the analysis, recognising they are unlikely to change (and hence supporting suitability of a B4 Mixed Use zoning).
- Factors used to consider use and form in the broader precinct include street forming (page 17), SEPP 65 Apartment Design Guidelines (ADG) requirements (page 19), site suitability (page 20) and solar studies (pages 25-27).
- While pockets of B4 Mixed Use zone commonly fringe the B3 Commercial Core zone, significant incursions of residential development have also occurred within the B3 Commercial Core zone.

- The analysis shows there is merit in considering a mixed use zoning, however, this raises concerns about the potential for further one off rezonings reducing the size and effectiveness of the commercial core zone.

#### Height – partially addressed

- Page 8 shows the existing height controls applicable to the broader precinct and surrounding area.
- Page 9 demonstrates current buildings that exceed the height controls under Willoughby *Local Environmental Plan 2012* and existing significant towers within the Chatswood CBD.
- Page 12 depicts building heights that could be achieved based on existing bonus FSR provisions under clause 4.4A (12) of *Willoughby Local Environmental Plan 2012* if sites were amalgamated.
- Factors used to consider height in the broader precinct include solar access (pages 13-15), maximum building height of existing built form within the Chatswood CBD, notably Metro Grand (page 16) and street forming (pages 18 and 23).
- The 60 metre street wall is reflected on sites to the south of the Pacific Highway, terminating on the corner of this site. This appears suitable as sites to the north have a different development typology, for example, 25 metre podium, with towers up to 94 metres set well back from street level. This proposal differs in that the higher tower is not proposed to be setback to any significant extent from the street wall (given potentially the limits of a small site).
- Proposed maximum building heights for sites within the broader precinct as part of a future scenario have not been specified.
- From the page 29 3D drawings, it appears that the proposed height for 815 Pacific Highway, Chatswood is unchanged from that sought in the planning proposal (i.e. 130 metres). From the analysis, this appears to include a 25 metre street wall, 60 metre tower on the south-west corner and a taller tower to the north.

#### Yield (including FSR) – not addressed

- Page 12 depicts maximum gross floor area that could be achieved based on existing bonus FSR provisions under clause 4.4A (12) of *Willoughby Local Environmental Plan 2012* if sites were amalgamated.
- Proposed floor space ratio controls for land within the broader precinct have not been specified.
- Floor area figures have been used for the traffic analysis on page 32. These note that commercial will increase compared to the LEP controls (by an additional 11,800 m<sup>2</sup>), while adding substantial residential floor space (an additional 83,365 m<sup>2</sup>).

#### Traffic impact – partially addressed

- The traffic analysis on page 32 predicts an over 50% increase in traffic generation during morning peak period resulting from a future development scenario.
- The analysis does not include an assessment of the impacts that future traffic would have on the surrounding road network, in particular, the directional split of traffic,

intersection performance or whether the additional traffic generated would be expected to compromise the safety or function of the surrounding road network.

- Identification of road upgrades to assist with the additional traffic flows have not been identified as part of the study.

Visual impact – partially addressed

- Pages 29-31 shows diagrams of the envisaged built form of the broader precinct when viewed from different angles.
- There appears to be very little 'stepping down' in building heights towards the periphery of the CBD so as to achieve a better tower height distribution across the Chatswood CBD skyline and adjacent areas.
- The significance of visual impacts, including additional overshadowing to the low-medium density residential development to the west of the precinct, has not been included.

Any impacts to the development potential of the adjoining land – not addressed

- Page 22 shows a 6 metre separation between the proposed development (podium level) at 815 Pacific Highway, Chatswood and the proposed potential residential on the adjoining land at 15 Help Street, Chatswood.
- SEPP 65 ADG generally requires a separation distance between 12-24 metres for 9 storeys and above.
- The proposed built form outcomes for the adjoining land would not appear capable of being achieved based on the development controls sought by the planning proposal.

Council should also be given the opportunity to review and comment on this broader precinct analysis.

Should you have any queries in regard to this matter, I have arranged for Ms Karen Armstrong Director, Sydney Region East to assist you. Ms Armstrong can be contacted on (02) 9228 6512.

Yours sincerely

 6 June 2016  
**Stephen Murray**  
A/Executive Director, Regions  
Planning Services