



24 April 2020

Andreas Antoniadis
Antoniades Architects
Suite 305, Level 3, 19a Boundary Street,
Darlinghurst NSW 2010

Dear Andreas

Request for a planning proposal for 252-254 New South Head Road, Double Bay

I refer to your request for a planning proposal submitted for land at 252-254 New South Head Road, Double Bay (the site), received by our customer service staff on 17 March 2020. In summary, the requested planning proposal involves the following amendments to *Woollahra Local Environmental Plan 2014* (Woollahra LEP 2014) to:

- Amendment to the maximum building height standard from 13.5m to 22m with a secondary height control for part of the site to RL 45.90m.
- Amendment to the floor space ratio (FSR) standard from part 1.3:1 to 2.6:1 across the entire site.

We have completed an initial review of the requested planning proposal. The review includes planning matters identified by Council at a pre-lodgement meeting on 14 August 2019, as well as matters required to be addressed by the Department of Planning and Environment's "*A guide to preparing planning proposals*".

Our review has identified that the information provided with the request is insufficient for Council to appropriately assess the merit of the proposed amendments to Woollahra LEP 2014. The following information is required for a full assessment of the request.

Core documents

- No consultation with surrounding property owners has been discussed. Staff encourage the applicant to engage with surrounding property owners at the early stages of the planning process.

The following information must be provided:

- Disclosure statement (political gifts and donations).
- Survey plan. An annotated copy is provided in the urban design report. Provide an unannotated copy with a clear resolution at an A3 print size.

Planning proposal report

The following information must be provided:

- The report must address the provisions of the *Local Strategic Planning Statement 2020*.
- Confirm the existing number of dwellings on the site.

Other supporting studies and information

Studies, investigations and reports supporting the requested amendments must relate to the **maximum** proposed building height / FSR envelope, as well as the concept plan envelope (for example shown as "wire frame" superimposed on photographs and plans).

The following information must be provided:

- Photomontage and site photographs must show the **maximum** proposed building height / FSR envelope, as well as the concept plan envelope.
- 3D Model in the format required by Attachment 9: 3D Digital Model Technical Requirement of Council's DA Guide (showing **maximum** proposed building height / FSR envelope, as well as the concept plan envelope).

The following reports require amendment (or additional statement) to be considered sufficient for assessment:

- View analysis – The view analysis included in the Antoniades Architects, GMU and GSA drawings and reports is insufficient for a full assessment of the potential view impact of the proposal. The applicant must provide an analysis from an expert specialising in view impact assessment.
- Shadow diagrams – The shadow diagrams included in the Antoniades Architects, GMU and GSA drawings and reports is insufficient for a full assessment. The applicant must provide shadow diagrams and analysis showing **maximum** proposed building height / FSR envelope, as well as the concept plan envelope.
- Urban design – The urban design analysis included in the GMU and GSA drawings and reports is insufficient for a full assessment. The applicant must update diagrams, such as streetscape diagrams, and analysis showing **maximum** proposed building height / FSR envelope, as well as the concept plan envelope.

A more detailed description of all the additional information required is provided in **Attachment 1** to this letter. We require the submission of this information so that we can commence our detailed assessment.

Voluntary Planning Agreement

The Woollahra Voluntary Planning Agreement Policy 2020 (VPA Policy) was adopted by Council on 10 February 2020. Under this policy, Council may consider entering into a planning agreement where there will be an opportunity or likely requirement for a development contribution, including requests for planning proposals seeking a change to Woollahra Local Environmental Plan 2014 to facilitate the carrying out of development.

This request for a planning proposal seeks changes to the current planning controls for the site. If approved, these changes will substantially increase the development potential of the site and hence its land value. With this in mind, Council anticipates negotiating a planning agreement prepared in accordance with the VPA Policy, to share in this value uplift for the community's benefit. We emphasise, however, that the strategic merit of a planning proposal must be fully justified and the Council would need to support the requested changes.

Council prefers that negotiations for a planning agreement commence before the lodgement of a planning proposal. Further, the VPA Policy seeks to separate the role of Council as an asset manager and planning authority to ensure probity. In this regard, please contact the Director – Technical Services to discuss the requirements for a planning agreement.


Next steps

This request has been classified as a major planning proposal, and we require a payment of \$40,950 (GST exempt). This fee must be paid at the time the additional information is lodged. The fee is relevant for the 2019/20 financial year only. Any fees payable outside this period will be subject to the adopted fees and charges for the relevant financial year.

Once you have provided the additional information identified above and the stated fee, we will commence the detailed assessment of the request for a planning proposal. Further information may be required by Council officers once this detailed assessment commences.

If you require further information, please contact Jorge Alvarez on 9391 7073.

Yours sincerely



Chris Bluett
Manager Strategic Planning

**Attachment 1: Request for a planning proposal for
252-254 New South Head Road, Double Bay**

Additional information required following initial review

A request for a planning proposal was submitted for land at 252-254 New South Head Road, Double Bay (the site), on 17 March 2020.

We have completed an initial review of the requested planning proposal. The review includes planning matters identified by Council at a pre-lodgement meeting on 14 August 2019, as well as matters required to be addressed by the Department of Planning and Environment's "*A guide to preparing planning proposals*".

Our review has identified that the information provided with the request is insufficient for Council to appropriately assess the merit of the proposed amendments to Woollahra LEP 2014. The table below provides a list of information identified as essential for the assessment of the application. Where the submitted information is deficient or is not provided, an "✖" has been indicated in the "Matter Addressed" column.

Council staff received the following documents from the applicant:

- Completed pre-application consultation form, signed by Hpone Thaung, received on 17 March 2020 (signed 6 March 2020).
- Enduring power of attorney for Raimond Schaw as 'principal', and Hpone Myint Thaung as 'attorney' – Registered 2/8/2018
- Planning proposal report prepared by GSA Planning dated March 2020.
- Architectural drawings prepared by Antoniades Architects dated 26 February 2020.
- Urban design report prepared by GMU Urban Design and Architecture dated March 2020.
- Traffic and parking impact report prepared by TTPA dated March 2020
- Acoustic assessment prepared by Renzo Tonin & Associates dated 2 March 2020.
- Arboricultural impact assessment prepared by Advanced Treescape Consulting dated 11/03/2020.
- Stormwater management drawings prepared by Antoniades Architects / Integrated Group Services (IGS) dated March 2020.

Pre-lodgement Advice Matters	Information Provided and Comment	Matter Addressed
Core documents		
<ul style="list-style-type: none">• Request for planning proposal application form	Application form submitted.	✓
<ul style="list-style-type: none">• Land owners consent	Provided Owner is Raimond Schaw and Assoc. Signature of Hpone Thaung provided on application form. Hpone Thaung is listed as 'attorney' on Power of Attorney for Raimond Schaw as 'principal'.	✓

Pre-lodgement Advice Matters	Information Provided and Comment	Matter Addressed
<ul style="list-style-type: none"> Concept plans including elevations and sections illustrating the distribution of land use and building bulk. 	<p>Provided.</p> <p>Antoniades Architects</p>	✓
<ul style="list-style-type: none"> Results of any consultation with surrounding property owners. 	No information provided.	✗
<ul style="list-style-type: none"> Disclosure statement (political gifts and donations) 	Not provided.	✗
<ul style="list-style-type: none"> Survey plan. 	Not provided	✗
Supporting studies		
Studies, investigations and reports supporting the requested amendments and relating to the maximum requested building height / FSR envelope, as well as the concept plan envelope, including:	-	-
Planning proposal report Report to address the matters in <i>A guide to preparing planning proposals</i> (2016). In particular, 'Chapter 2: The parts of a planning proposal' and 'Attachment 1: Information checklist'	Provided. GSA.	-
<ul style="list-style-type: none"> Regional and district plans 		
<ul style="list-style-type: none"> <ul style="list-style-type: none"> Consistent with the relevant regional plan, district plan, or other strategic plans 	<p>Statement provided.</p> <p><i>Greater Sydney Region Plan - A Metropolis of Three Cities</i></p>	✓
<ul style="list-style-type: none"> <ul style="list-style-type: none"> Consistent with a relevant local council strategy that has been endorsed by the Department. 	<p>Statement provided.</p> <p><i>Eastern City District Plan</i></p>	✓
<ul style="list-style-type: none"> Local Strategies 		
<ul style="list-style-type: none"> <ul style="list-style-type: none"> <i>Local Strategic Planning Statement 2020</i> 	Not addressed.	✗
<ul style="list-style-type: none"> <ul style="list-style-type: none"> <i>Woollahra Community Strategic Plan 2030</i> 	Statement provided. GSA	✓

Pre-lodgement Advice Matters	Information Provided and Comment	Matter Addressed
<ul style="list-style-type: none"> Woollahra Local Environmental Plan 2014 		
<ul style="list-style-type: none"> Justify proposed height standard. 	Provided. GSA and GMU reports.	✓
<ul style="list-style-type: none"> Justify proposed FSR standard. 	Provided. GSA and GMU reports.	✓
<ul style="list-style-type: none"> Woollahra Development Control Plan 2015 		
<ul style="list-style-type: none"> Address the manner in which the proposal will be consistent with the desired future character of the Double Bay Precinct as described in the DCP. 	Statement provided. GSA and GMU reports	✓
<ul style="list-style-type: none"> Address whether the proposed planning controls may require associated amendments to the DCP. 	Statement provided. No amendment to controls requested.	✓
<ul style="list-style-type: none"> Development yield analysis for residential dwellings and employment generation. 		
<ul style="list-style-type: none"> Number of existing dwellings. 	Not provided.	x
<ul style="list-style-type: none"> Number and size of proposed dwellings 	Provided. GSA and GMU reports 33 units, various sizes	✓
<ul style="list-style-type: none"> Existing and proposed car parking numbers 	Provided. TTPA report 4 car space + 2 share spaces	✓
Other supporting studies and information		
<ul style="list-style-type: none"> Photomontage and site photographs 	Insufficient. Photomontages and site photographs must show the maximum proposed building height / FSR envelope, as well as the concept plan envelope.	x

Pre-lodgement Advice Matters	Information Provided and Comment	Matter Addressed
<ul style="list-style-type: none"> 3D Model in the format required by Attachment 9: 3D Digital Model Technical Requirement of Council's DA Guide. 	Not provided	x
<ul style="list-style-type: none"> View analysis 	<p>Insufficient.</p> <p>The view analysis provided in the GMU and GSA reports is insufficient for a full assessment of the potential view impact of the proposal. The applicant must provide an analysis from an expert specialising in view impact assessment.</p>	x
<ul style="list-style-type: none"> Shadow diagrams 	<p>Insufficient.</p> <p>The shadow diagrams and analysis provided by Antoniades Architects and GMU are insufficient for a full assessment of the potential shadowing impact of the proposal. The applicant must provide shadow diagrams and analysis showing maximum proposed building height / FSR envelope, as well as the concept plan envelope.</p>	✓
<ul style="list-style-type: none"> Arboricultural Report 	Provided. Advance Treescape Consulting report.	✓
<ul style="list-style-type: none"> Traffic and parking assessment 	Provided. TTPA report	✓
<ul style="list-style-type: none"> Urban design analysis 		
<ul style="list-style-type: none"> <ul style="list-style-type: none"> Address urban design comments from pre-planning proposal request meeting 	<p>Insufficient.</p> <p>The urban design analysis include in the GMU and GSA drawings and reports is insufficient for a full assessment. The applicant must update diagrams, such as streetscape diagrams, and analysis showing maximum proposed building height / FSR envelope, as well as the concept plan envelope.</p>	x

Pre-lodgement Advice Matters	Information Provided and Comment	Matter Addressed
<ul style="list-style-type: none"> ○ Address SEPP 65 and the Apartment Design Guide and in particular building separation requirements in Control 3F-1. 	Provided. GMU report.	✓
<ul style="list-style-type: none"> • Geotechnical investigation 	Not provided. Not essential.	✓
<ul style="list-style-type: none"> • Acoustic assessment 	Provided. Renzo Tonin report.	✓
<ul style="list-style-type: none"> • Other considerations 		
<ul style="list-style-type: none"> • Economic impact assessment 	Statement provided. GSA report.	✓
<ul style="list-style-type: none"> • Infrastructure servicing and potential funding arrangements 	Statement provided. GSA report.	✓
<ul style="list-style-type: none"> • Flood risk study 	<p>Not applicable. Not flood affected.</p> <p>Stormwater Management Plan provided. Antoniades Architects / IGS.</p>	✓
<ul style="list-style-type: none"> • Contaminated land 	Not applicable. Unlikely to be contaminated	N/A
<ul style="list-style-type: none"> • Acid Sulphate Soil 	Not applicable. Class 5 soil.	N/A
Voluntary Planning Agreement		
<ul style="list-style-type: none"> • VPA offer 	Not provided.	✗