

Our ref: 18148

2 November 2020

The General Manager
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Attention: Mr Nick Economou,
Acting Director, Planning & Development

Dear Mr Economou,

**LATE CORRESPONDENCE
ENVIRONMENTAL PLANNING COMMITTEE– ITEM R4
REQUEST FOR PLANNING PROPOSAL AT
Nos 252-254 NEW SOUTH HEAD ROAD, DOUBLE BAY**

We submit this Late Correspondence for distribution to the Councillors of the Environmental Planning Committee. This is in relation to the report prepared for the Environmental Planning Committee Agenda for 2 November 2020 regarding Item R4.

In our view, the report has not accurately represented the proposal, has factual errors, and has not acknowledged the positive aspects of the proposal, of which there are many. Therefore, we have prepared this late correspondence to redress those omissions.

The report states

- i. The proposed maximum building height and FSR standards are excessive and would create a building envelope which has an excessive bulk and scale.
- ii. The requested increase in both the maximum building height and FSR standards are inconsistent with the existing and desired future character of the Double Bay residential precinct.
- iii. The proposed standards would create a building envelope that will adversely impact on the site and its surroundings, particularly with regard to streetscape; landscape character and views.

We respond that the proposal has carefully responded to the site and surrounds; and can be supported by Council from a Site Specific and Strategic Merit point of view. We contend that the proposed building height and FSR is both consistent and compatible with the New South Head Road context and the Double Bay residential zone in the immediate vicinity and will not result in a perceived 'excessive' bulk and scale, but is instead compatible with nearby development. The main road location is highly suitable for uplift with convenient access to Edgecliff and Double Bay.

We further contend that the proposed dual height building envelope has been modelled to maintain amenity for nearby sites and their residents, and that a future development resulting from the Planning Proposal would be compatible with the streetscape, would preserve the landscape character; and preserve and maintain views across the site.

1. PROPOSAL'S STRATEGIC MERIT

The key site-specific reasons to amend the Woollahra LEP 2014, with consideration of the surrounding existing and approved uses, services, and infrastructure, include:

- Consistent with the *Greater Sydney Region Plan: A Metropolis of Three Cities*; and the *Eastern City District Plan*;
- A potential contributor to Council's housing targets, as agreed in consultation with the Greater Sydney Commission;
- A building height which provides transition between neighbour develops and consistent with comparable local centres and corridors with a similar role as New South Head Road;
- Consistent with transit-oriented development approach and accentuating prominent locations, including core areas;
- Complementary use to the surrounding residential uses;
- Close to various public transport connections such as train from Edgecliff Railway station and bus services along New South Head Road.
- Convenient proximity to the nearby centres of Edgecliff and Double Bay.

Accordingly, in our opinion, the site-specific planning proposal has merit and can be supported.

2. RESPONSE TO REPORT

We regard this report as incomplete because critical information is not included:

- The **GMU's Urban Planning Report**.
- The **detailed View Analysis**.

3. INACCURATE ASSESSMENT

Context, Built Form & Scale –

- Contextually Compatible:** The site is a good fit; it is contextually compatible. The secondary height limit proposed to the New South Head Road streetscape is entirely compatible and consistent with adjacent and nearby built forms (see **Figure 1**).

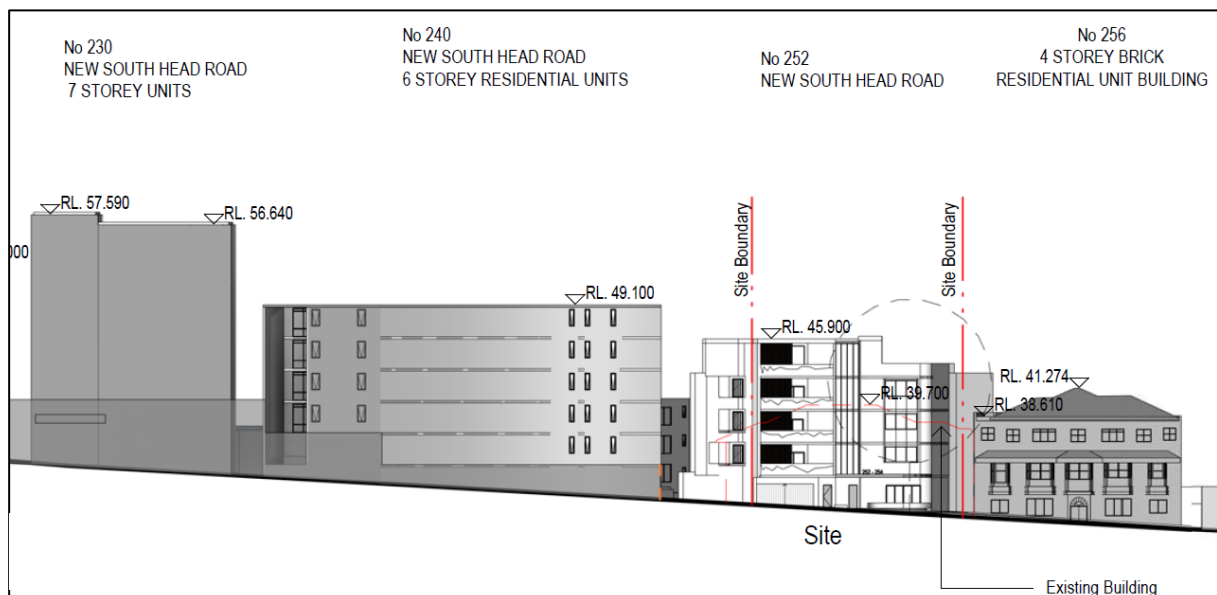


Figure 1: Streetscape Elevation with RL45.90 AHD Height

- b. **Well-modulated:** The proposal is well-modulated and articulated top New South Head Road; and depicts the potential form of a future skilfully-designed building to the FSR and heights proposed. This includes retention of the Jacaranda. This is the context as depicted in the streetscape (see **Figure 2**).



Figure 2: Perspective of Proposal in the Streetscape

- c. **Local Character:** In our view it is disingenuous to refer to a 'low scale, leafy character' for New South Head Road. Likewise, the buildings surrounding the site are also not 'low-scale'. We note this comment is based on 'the entire Woollahra local government area' which has an extremely varied character. To be relevant, comments should be confined to the immediate vicinity's character.

With respect to the Woollahra Local Strategic Planning Statement, in our opinion, the planning proposal density would allow future development which meets those requirements, inter alia:

Housing is designed to be the right fit for the character, heritage, landscape and village scale of our area. It is located in well-planned places that are close to villages, services and public transport hubs. Everything is on our doorstep – shops, cafes, markets, libraries, parks, our foreshore, schools, health services, aged care facilities and more.

Diverse and affordable housing options in accessible locations provide for a range of needs and incomes. Council collaborates with government agencies, other councils and organisations on affordable housing programs.

Development that creates new dwellings or commercial buildings contributes to providing upgrades and improvements that enhance the liveability, infrastructure and amenity of our area.

The proposal is well-located; offers affordable and accessible housing and by the future design will create dwellings which utilise existing infrastructure while maintaining nearby amenity.

When viewing the proposal within the streetscape, we consider misleading to show the 22 metre height limit which is **not proposed** as part of the planning proposal. The RL at street front is shown at RL 45.90 AHD, which is all that is requested. **Figure 3** on the following page illustrates why the 22 metre height limit was not proposed at the street front



Figure 3: The 22m Height Limit is NOT proposed at the Street front

The report refers to site coverage and estimated FSR of nearby developments. A future proposal would be compliant with applicable LEP standards and DCP objectives. We note site coverage is not a consideration on its own, however the proposal has an estimated 52% site coverage. The neighbouring site to the west is dominated by driveway across the southern portion and therefore 'site coverage' is far higher than the 25% shown in **Figure 4**. The immediate vicinity to the west has developments of 100% site coverage, and to the east, 85%.

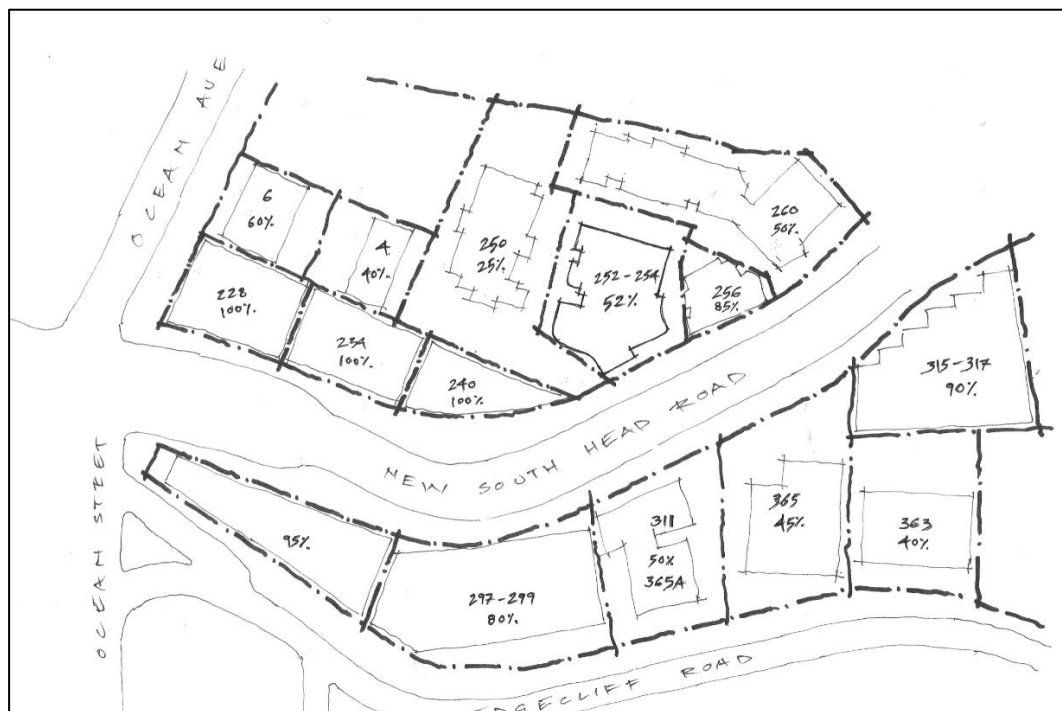


Figure 4: Estimated Site Coverage of nearby Sites

2. **View Sharing & View Corridors** – a full massing was provided to all boundaries as requested. In terms of existing views, the only views available to nearby residents at lower levels of No 240 NSH Road are along the side setbacks.

Due to COVID lockdown restrictions, it was not possible to gain access to nearby apartments, and with Council's agreement, Antoniades Architects prepared detailed representations based on survey information, to represent the views.

Naturally, any new building would be required to have side setbacks, therefore it was the indicative proposal's massing that was discussed. It is meaningless, in our view, to provide an assessment of a form that would not be permitted, particularly when a full width building would obscure existing views.

Hence the view analysis depicted both the full width and depicted and assessed the indicative proposal's compliant setback massing.

Landscaped Character & Tree Canopy – the depiction of a leafy New South Head Road is maintained because the existing Jacaranda in the front setback is retained as part of the indicative proposal.

Retention of this tree would be conditioned as part of a future consent. We note the jacaranda is a deciduous species in late winter and early spring, and therefore the leafy character does vary, nevertheless a future application would include abundant landscaping in the front setback.

In addition to the retaining the Jacaranda, we note the indicative proposal provides SEPP 65 & DCP-required setbacks and is therefore entirely capable of achieving all landscaped character requirements (see **Figure 5**).

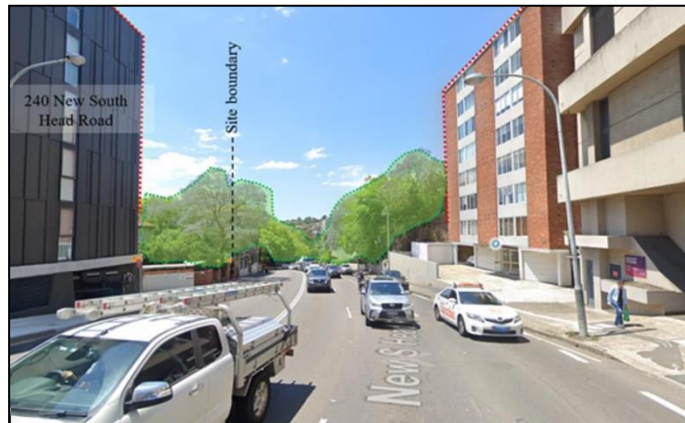


Figure 5: Landscape Concept for Planning Proposal showing Significant Landscaped Areas

The images on the following page demonstrate the addition of green shading to a Google Street View image misrepresents the extent of landscaping within the subject site's front garden. It can further be seen that the abundant landscaping beyond the site is unaffected by the proposal (see **Figure 6** on the following page).



This is the actual view of New South Head Road



This is the image with green shading over all trees, which misrepresents the view



This image clarifies the extent of landscaping in the existing front setback



Looking towards Edgecliff

Figure 6: Images of new South Head Road Landscaped Character

3. **Diverse Housing** –Double Bay/Edgecliff has a quite different character to other areas of the Woollahra LGA. This is a higher density area close to transport and the CBD, which is an obvious location in which to provide housing for individual or couple households. This will also assist Council in achieving housing targets which were set in consultation with the Greater Sydney Commission, as part of the draft Housing Strategy.
4. **Placemaking** – The proposal will contribute to the emerging character of this part of New South Head Road. The site is outside the Double Bay Centre, which has a rather different character to this location. The site is not in a 'village' environment, as the comment references.
5. **Original Scheme not supported in Pre-PP** – Firstly, the proposal was altered between the two submissions, and secondly, the pre-PP notes required further explanations and justifications. The latter appears to be common practice for Pre-PP notes: to not support and to require further information and justification. The developed PP is far superior in terms of integration into the streetscape (see **Figure 7**).



Pre-PP Streetscape



Figure 7: Articulated & Modulated Form, with Tree retained, Appropriate in Streetscape

4. CONCLUSION

We consider the proposal has not been accurately represented in the report, and that the indicative proposal has demonstrated the careful consideration of nearby residents' amenity in terms of outlook/views, solar access, privacy, bulk and scale etc.

The Strategic Merits support the proposed uplift for this site. We consider the planning proposal to be well-resolved and should be supported.

If you require further information, do not hesitate to contact our office on 9362 3364.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'G. Karavanas', written in a cursive style.

George Karavanas
DIRECTOR