



PRE-PLANNING PROPOSAL REPORT

Planning Proposal to Vary Building Height and FSR
for a Specific Site at

**No. 252-254 New South Head
Road, Double Bay**

Prepared for:

Penoh Capital Land Pty Ltd

C/- Antoniades Architects

24 Bay Street

Double Bay NSW 2028

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Abbreviation	Abbreviation Meaning
ADG	Apartment Design Guide
AHD	Australian Height Datum
ANEF	Australian Noise Exposure Forecast
AS	Australian Standard
ASS	Acid Sulfate Soils
CBD	Central Business District
CMP	Construction Management Plan
Council	the Council
CRZ	Critical Root Zone
DA	Development Application
DCP	Development Control Plan
DP	Deposited Plan
DPE	Department of Planning and Environment
EIS	Environmental Management Plan
EPA Act	Environmental Planning and Assessment Act 1979
EPA Reg	Environmental Planning and Assessment Regulations 2000
EUR	Existing Use Rights
FFL	Finished Floor Level
FSR	Floor Space Ratio
GFA	Gross Floor Area
GSC	Greater Sydney Commission
HCA	Heritage Conservation Area
HIA/HIS	Heritage Impact Assessment/Heritage Impact Statement
IHAP	Independent Hearing and Assessment Panel
LEP	Local Environmental Plan
LGA	Local Government Area
MHWM	Mean High Water Mark
NSW	New South Wales
NSWLEC	NSW Land and Environment Court
OEH	Office of Environment and Heritage
OSD	On-Site Detention
PoM	Plan of Management
POS	Private Open Space
PPPR	Pre-Planning Proposal Report
PP	Planning Proposal
REF	Review of Environmental Factors
RFB	Residential Flat Building
RL	Reduced Level
RMS	Roads and Maritime Services
SEE	Statement of Environmental Effects
SEPP	State Environmental Planning Policy
SREP	Sydney Regional Environmental Plan
SP	Strata Plan
SWMP	Stormwater Management Plan
TPZ	Tree Protection Zone
VENM	Virgin Excavated Natural Material
WMP	Waste Management Plan
WSUD	Water Sensitive Urban Design

1.0 INTRODUCTION

This Pre-Planning Proposal report (PPPR) has been prepared on behalf of Penoh Capital Land Pty Ltd by Gary Shiels & Associates Pty Ltd – (hereafter referred to as GSA Planning). GSA Planning has expertise in Urban Design, Environmental & Traffic Planning. This Planning Proposal is for the property known as No. 252-254 New South Head Road, Edgecliff (hereafter referred to as ‘the subject site’).

The subject site is on the northern side of New South Head Road and adjoins a portion of New South Head Road has been under investigation by Council to consider built forms and uplift for the sites lining the road. Previous Council investigations into nearby opportunity sites justified increasing density, building height and floor space ratio close to the Edgecliff Centre as being consistent with the well-established best planning practice of increasing development potential in centre to promote more sustainable and public transport oriented development.

To facilitate the redevelopment of the site and invigoration of the New South Head Road corridor at Double Bay, the Planning Proposal seeks to amend the Woollahra Local Environmental Plan (LEP) 2014, with site-specific changes to the LEP Maps, summarised as follows:

- Building Height proposed: 22 metres (currently 13.5m); and
- Floor Space Ratio proposed: 2.6:1 (currently 1.3:1).

The existing building on the subject site is a deteriorating four-storey residential flat building, with no parking available on the site. The built form proposed in this PPPR has been designed by Antoniades Architects and presents a continued residential flat building use on the subject site.

The Pre-Planning Proposal has allowed Antoniades Architects to develop a concept design for a residential flat building on the site, which presents a contemporary built form and respects and protects the integrity of the existing and future character, and nearby amenity. The built form would complement the location and the adjacent and nearby taller buildings. The proposal demonstrates the ‘contextual fit’ of additional height and FSR on the site.

The proposed residential flat building’s form has been designed to present as a contemporary building when viewed from New South Head Road. This report has also investigated potential effects on views, overshadowing and privacy from the proposed built form. The concept design’s controlled bulk and scale and central location within the site have been demonstrated to minimise any effects.

Proximity to excellent public transport services and local facilities will be convenient and desirable for future residents. A residential flat building complements nearby residential uses and maintains local amenity.

This report will include a description of the following: the site and locality; existing and desired future character; explanation of provisions; concept plans; relationship to strategic planning framework; environmental, social and economic impact; and conclusion.

2.0 SITE ANALYSIS

This section contains a description of the following: The Locality; Site Description and Existing Built Form; Existing Character and Context; and Nearby Planning Proposals Approved.

2.1 The Locality

The subject site is located approximately 2.8km east of the Sydney CBD and is in the New South Head Road Corridor, within the Woollahra LGA (see Figure 1).



Source: SIX Maps, 2019

 Subject Site

Figure 1: Location Plan

2.2 Site Description and Existing Built Form

The subject site is located on the northern side of New South Head, and is known as No. 252-254 New South Head Road, Double Bay, described as SP11702. The site's area is 934.9m². The site is zoned R3 Medium Density Residential under the Woollahra LEP 2014.

The site is occupied by a four-storey residential flat building with a hipped tile roof, known as the 'Dalkeith Building' (see Photograph 1). The existing building contains eight units, and is deteriorated in comparison to many developments nearby the subject site. The site includes substantial landscaping and is accessible via two pedestrian entrances off New South Head Road (see Photograph 2). There is no vehicle parking available on the site.



Photograph 1: The subject site, as viewed from New South Head Road



Photograph 2: The subject site, as viewed from No. 250 New South Head Road

2.3 Existing Character and Context

The surrounding area is characterised by retail and commercial buildings, medium density mixed use development, residential development, and the Ascham School. The Edgecliff Centre, Railway Station and Bus Interchange is approximately 200m from the subject site. Much of the development fronting New South Head Road was constructed in the Inter-War period and is reaching the end of its useable life.

Significant urban renewal occurring along New South Head Road is seeing the character of the area evolve. Double Bay and the nearby Edgecliff Local Centre is in a state of transition, supported by higher density developments which reflect the high accessibility of the area. New South Head Road has been the subject of a number of recently proposed and approved planning proposals for increased height and density in the vicinity of the subject site.

Development to the North

To the north of the subject site is No. 260 New South Head Road, which contains a three-storey brick residential flat building with 11 units, a small number of parking spaces at ground level, and substantial landscaping in the front and rear setbacks. The site wraps around to comprise a frontage on New South Head Road (see Photograph 3). Further to the north is No. 2 Holt Street which comprises a three-storey brick residential flat building with hipped tile roof, and 15 units with parking at ground level (see Photograph 4).



Photograph 3: 260 New South Head Road, as viewed from the street



Photograph 4: No. 2 Holt Street, as viewed from the street

Development to the East

To the east of the subject site is No. 256 New South Head Road, a rendered brick three-storey residential flat building built with hipped tile roof. The existing building on this site is outdated and contains 6 units with car parking at ground level (see Photograph 5). Further to the east is the frontage of No. 260 New South Head Road, as abovementioned (see Photograph 6).



Photograph 5: No. 256 New South Head Road, as viewed from the street



Photograph 6: No. 260 New South Head Road, as viewed from the street

Development to the South

To the south is No. 311 New South Head Road, which comprises an eight storey brick residential flat building known as 'Edgecliff Towers'. The site is setback from the front boundary and comprises garage parking on the ground floor level (see Photograph 7). Also to the south of the subject site on the same allotment as No. 311 is No. 365A Edgecliff Road, which contains the second residential flat building associated with 'Edgecliff Towers' (see Photograph 8).



Photograph 7: No. 311 New South Head Road, as viewed from the street



Photograph 8: No. 365A Edgecliff Road, as viewed from the street

Development to the West

To the west of the subject site is No. 250 New South Head Road, which comprises a brick residential flat building with a flat roof. The site is setback off the street and does not have a frontage to New South Head Road, however pedestrian access and parking is provided via a footpath and driveway from New South Head Road (see Photograph 9). Further to the west is No. 240 New South Head Road, which comprises a recently developed contemporary residential flat building with a flat roof. The new development contains 19 units and is built to the front boundary (see Photograph 10).



Photograph 9: No. 250 New South Head Road, as viewed from the access handle



Photograph 10: No. 240 New South Head Road, as viewed from the street

2.4 Nearby Planning Proposal Approvals

The density of the Edgecliff Mixed Use Centre is increasing with new developments and amendments to the LEP height and FSR controls, as proposed and approved, along New South Head Road.

This includes the recent modifications to approval of a new five- to six-storey residential flat building with ground and basement car parking levels at Nos. 240-246 New South Head Road, to the west of the subject site (as discussed in Section 2.3) (see Figure 2 on the following page).

The approved planning proposal for this site amended the zoning to B4 Mixed Use, increased the height control to 24.9m, and increased the FSR control to 4.8:1. The previous development standards for the site were an FSR of 4.0:1 and a height of 18m with a height of 14m at the highest part of the land (Area H of Clause 4.3A(3)).



Source: Simmons Architects

Figure 2: Previously-Approved Development at Nos. 240-246 New South Head Road

Similarly, a planning proposal to increase the height and FSR controls at Nos. 80-84 and 90 New South Head Road has been approved. This saw the FSR control increase from 1.5:1 to 2.9:1, and the maximum building height control increase from 14.5m to 23.5m (see Figure 3).



Source: PTI Architects

Figure 3: Previously-Approved Development at Nos. 80-84 and 90 New South Head Road

Planning proposals have also been lodged for sites further along New South Head Road. This includes approval to amend the height control from 14.7m to 23.5m and amend the FSR control from 2.5:1 and 3:1 to 4.5:1 at No. 374 and 376-382 New South Head Road, Double Bay. This enables a six-storey mixed use development on the prominent corner site (see Figure 4). A DA has not yet been lodged for this site.



Source: Eeles Trelease Pty Ltd

Figure 4: Concept Plans for Nos. 374 and 376-382 New South Head Road

3.0 EXPLANATION OF PROVISIONS

The proposed amendments are, inter alia:

- Amending the Woollahra LEP 2014 Height of Building Map to indicate a maximum permissible height of 22m on site (currently 13.5m); and
- Amending the Woollahra LEP 2014 Floor Space Ratio Map to indicate a maximum permissible FSR of 2.6:1 on site (currently 1.3:1).

3.1 Building Height

The proposal would increase the height from 13.5 metres to 22 metres, however this is proposed to address the considerable level change within the site. The existing building sits almost three storeys below street level (see Photographs 11 & 12).

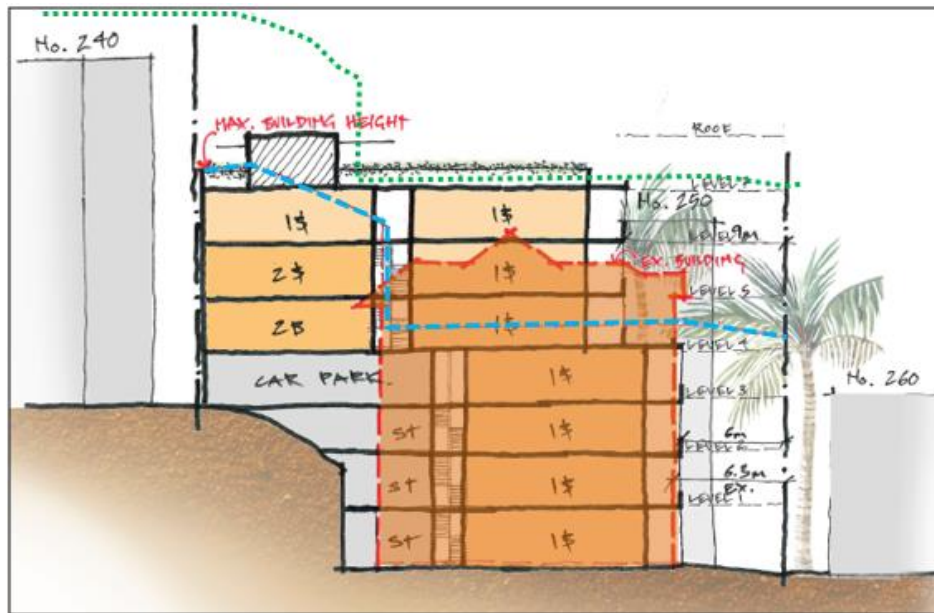


Photograph 11: New South Head Road approach to the site



Photograph 12: New South Head Road approach to the site

The existing residential flat building already exceeds the height limit by approximately 4.7m (see Figure 5).



Source: Antoniades Architects

Figure 5: Indicative Section

An increase in the permitted building height would be equivalent to another 1.5 floors above the existing roof line. The indicative concept increases the rear setbacks of the upper levels.

Increasing the permitted height would enable a future building to have a streetscape presence on New South Head Road. Currently the building sits below road level. By allowing additional height for the set down area, more flexibility would be available for the site.

The proposed amendment to height will provide a building envelope consistent with the evolving nature of the streetscape, and the proposed amendment to FSR controls the extent of the built form on the site. The proposed amendments will allow for a new, well-designed development that considers the context, character and future use of Double Bay as a busy local centre with a perimeter of increased residential density.

The following photographs show the existing conditions in New South Head Road (see Photographs 13, 14 & 15 on the following page).



Photograph 13: New South Head Road approach to the site



Photograph 14: The site in the New South Head Road streetscape



Photograph 15: The gap in the New South Head Road streetscape looking toward Edgedcliff

The concept proposal shows a building at street-front which is consistent with others nearby (see Figure 6).



Source: Antoniades Architects

Figure 6: Indicative Proposal in the Streetscape, as viewed from the east on New South Head Road

3.2 Floor Space Ratio (FSR)

The proposal would increase the site's FSR control from 1.3:1 to 2.6:1. This increase in FSR will accommodate an increased height, specifically towards the middle and rear of the site which presents steep and challenging topography. The proposed FSR would allow for a residential flat building that presents as four storeys to the street, remaining below the existing maximum height standard at the street front.

Importantly, the increased FSR will allow for a building envelope that does not present as being excessive in bulk or scale when viewed from the street, instead fitting more sympathetically with surrounding built forms (see Figure 7 on the following page).



Source: Antoniades Architects

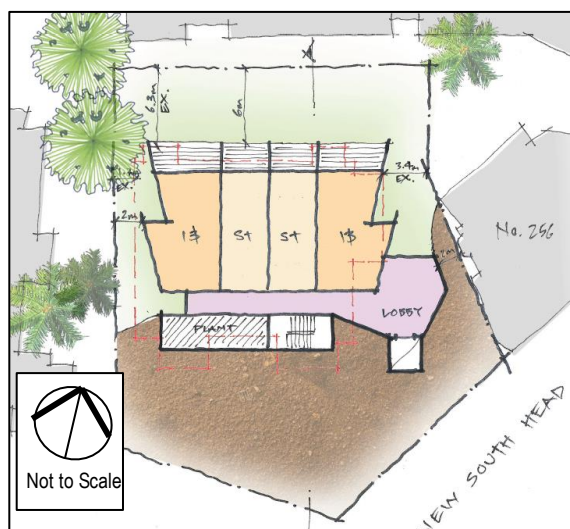
Figure 7: Indicative Aerial View of the Proposal in the Locality

Accordingly, in our opinion, the planning proposal provides an FSR control that more appropriately addresses the context of the site and the evolving character of the New South Head Road Corridor.

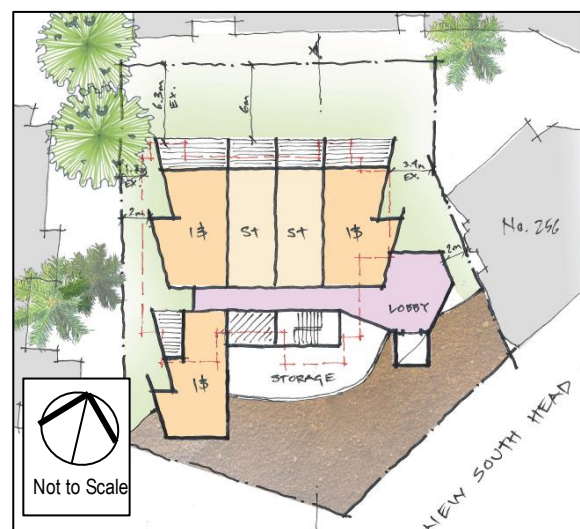
4.0 CONCEPT PLANS

Concept plans have been prepared by Antoniades Architects, which take into consideration the proposed building height and FSR. Modelling is based on a 7-storey residential flat building development, which would be accommodated by the amended development standards for the site.

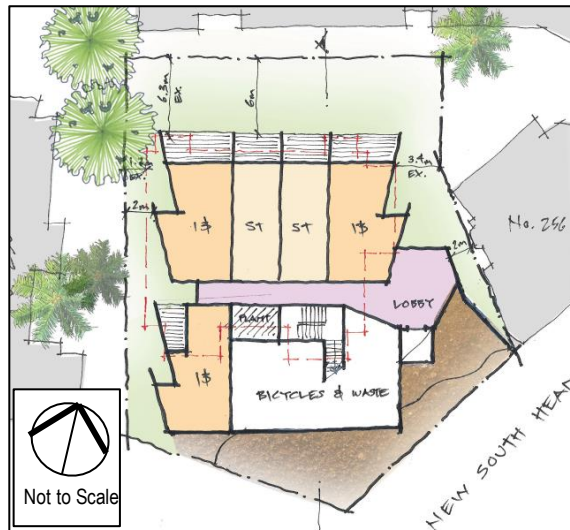
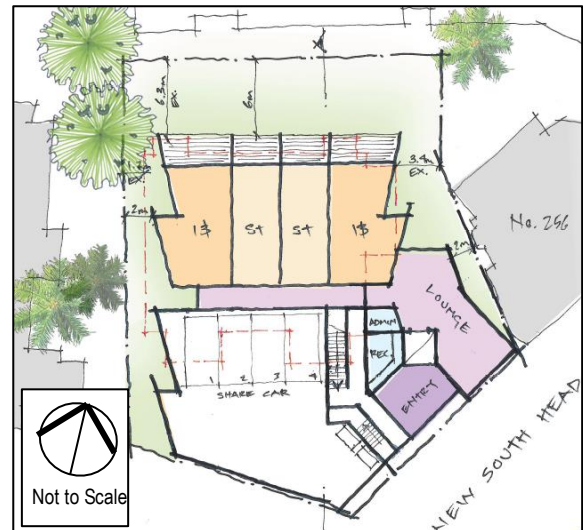
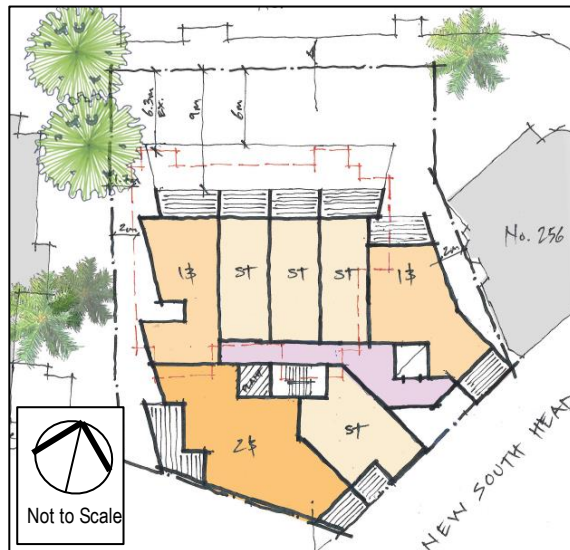
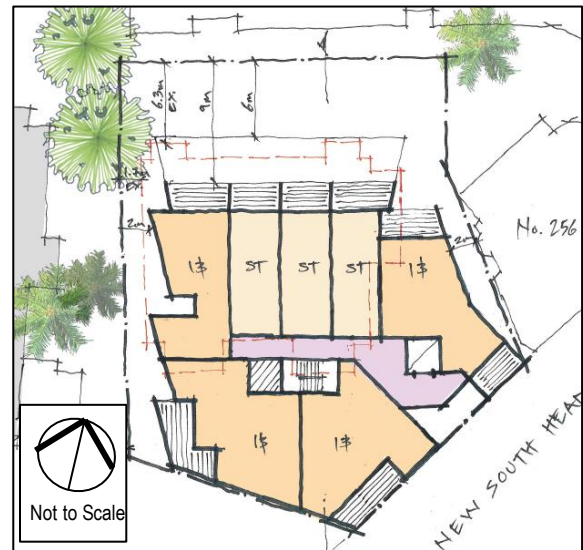
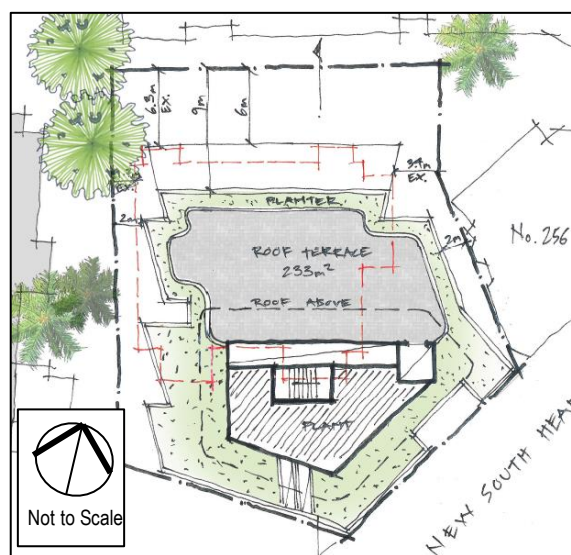
The proposed development considers key amenity considerations including solar access and visual and acoustic privacy. Conceptual plans of the proposed development are provided (see Figure 8 on the following pages).



Level 1 Floor Plan



Level 2 Floor Plan

**Level 3 Floor Plan****Level 4 Floor Plan****Level 5 and Level 6 Floor Plans****Level 7 Floor Plan****Roof Plan**

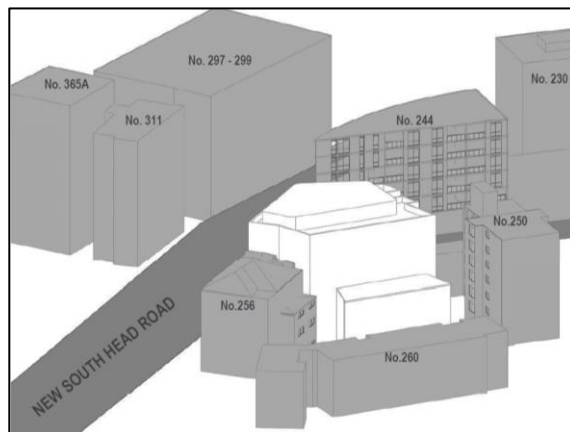
Source: Antoniades Architects

Figure 8: Indicative Floor Plans

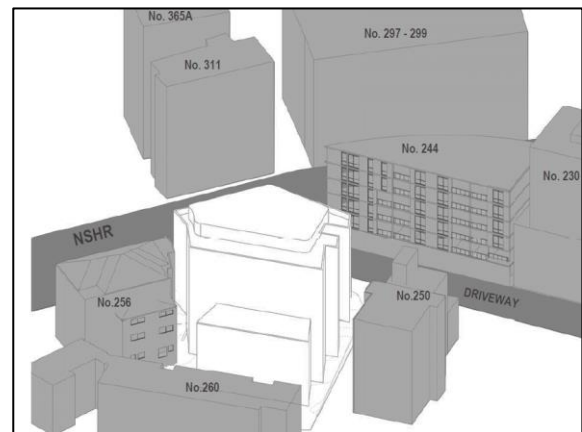
4.1 Solar Access

The proposal will maintain appropriate sunlight access to No. 248-250 by increasing side setbacks compared to the existing, with approximately 10.5m separation distance between the proposed built form and the neighbouring building. A 2m setback from No. 256 New South Head Road is proposed, with the siting and form of the concept building maximising solar access.

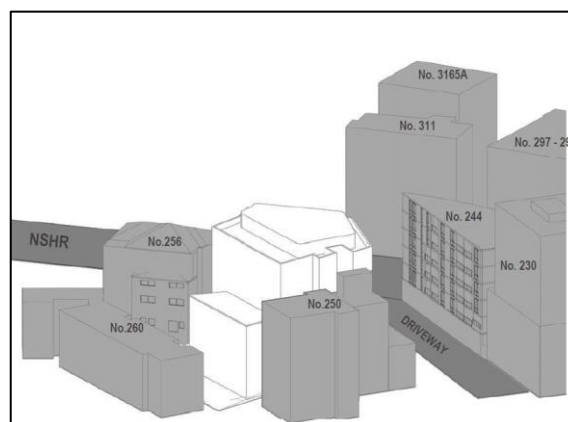
Sun eye diagrams have been prepared hourly between 9.00am and 3.00pm on 21st June by Antoniades Architects (separately submitted). These diagrams show that the proposed height and scale of the concept design is expected to maintain solar access requirements to neighbouring sites' private open space and windows (see Figure 9).



9.00am Sun's Eye Analysis



12.00pm Sun's Eye Analysis



3.00pm Sun's Eye Analysis

Source: Antoniades Architects

Figure 9: Indicative Sun's Eye Analysis

4.2 Views

The proposed increase in building height and FSR is likely to maintain existing views from nearby residential accommodation. Due to the existing density of New South Head Road and its surrounds, our preliminary investigation into views did not detect any significant views from residential developments within the vicinity of the subject site that would be significantly affected by the proposal.

The residential flat building directly opposite the site at No. 365A Edgecliff Road has views towards the harbour which would not appear to be interrupted by the proposed concept building. The proposed form provides a height at the street front compliant with the current height development standard (see Figure 10 on the following page).



Source: Thehomepage.com.au



Source: Rwebay.com.au



Source: Snowdenjones.com.au



Source: Mybhr.com

Figure 10: Views Across the Site from No. 365A Edgecliff Road

In our opinion, the preliminary view analysis shows the planning proposal's considerate form will encourage redevelopment which will maintain views for residents of nearby residential developments. Further view analyses will be carried out at the Planning Proposal and DA stage.

4.3 Acoustic and Visual Privacy

The planning proposal and concept design has considered the visual and acoustic privacy of neighbouring residential developments. Due to the generous separation between the subject site and nearby development, an increase in height and FSR would be unlikely to affect the privacy or amenity of residents.

As a residential flat building proposal would incorporate fewer windows at ground and first floor levels, privacy would also be maintained to occupants of No. 138-140 New South Head Road. Windows or glazing to upper level units alongside the inclusion of privacy screens, will maintain visual privacy for adjoining developments,

Balconies in the concept design have been oriented towards the rear of the site and New South Head Road to maintain privacy. Additionally, the communal roof terrace offers increased setbacks and separation distances from adjoining developments, with a planter buffer to assist in increasing privacy and minimising potential noise impacts. Other communal areas, such as the internal lounge and lobby, are unlikely to impact on privacy.

Accordingly, in our opinion, the planning proposal is unlikely to present any significant visual or acoustic effects on adjoining development.

The planning proposal will ensure that a building height and FSR desirable within the Double Bay Local Centre applies to the subject site. The indicative built form would accommodate a well-designed residential flat building, continuing the site's existing use and complementing the area's character; the bulk and scale of nearby existing and future development; and positively contribute to the New South Head Road streetscapes (refer to Concept Plans, separately submitted).

5.0 RELATIONSHIP TO STRATEGIC PLANNING FRAMEWORK

The planning proposal has strategic merit and is consistent with the objectives of the *Greater Sydney Region Plan - A Metropolis of Three Cities* (2018); and the actions and planning priorities of the *Eastern City District Plan* (2018). Additionally, consistency with the Plans and the Strategic Merit of the planning proposal, generally, will be assessed in the following sections.

5.1 A Metropolis of Three Cities

In March 2018, the GSC released the *Greater Sydney Region Plan: A Metropolis of Three Cities* which is the current metropolitan strategic plan to guide Sydney's long-term growth. This document replaces *A Plan for Growing Sydney* which was previously used to assess Planning Proposals.

The plan identifies three cities for the Greater Sydney Region with the subject site being located with the *Eastern City District Plan*.

The vision is for three cities where most residents live within 30 minutes of their jobs, education and health facilities, services and 'great places'. The overarching goals include the following:

- A city supported by infrastructure
- A collaborative city
- A city for people
- Housing the city
- A city of great places
- A well-connected city
- Jobs and skills for the city
- A city in its landscapes
- An efficient city
- A resilient city

A Metropolis of Three Cities states that the population of Greater Sydney is projected to grow to 8 million people over the next 40 years, and it is essential that residents have quick and easy access to jobs and essential services. Housing supply and choice will also need to increase to meet the growing and changing needs of the community. In response to this, the planning proposal will allow for increased and diversified housing supply close to the City and public transport hubs, whilst simultaneously updating the quality of the built form and housing compared to the existing situation on the site.

The planning proposal is consistent with the objectives of this Plan.

5.2 Eastern City District Plan

Double Bay is identified as a "local centre" in the *Eastern City District Plan*. The Edgecliff Local Centre is adjacent to the subject site.

The planning priorities and corresponding actions that are relevant to the planning proposal include the following, inter alia:

- **Planning Priority E1:** *Planning for a city supported by infrastructure.*

The planning proposal applies to a specific site in the existing Double Bay Local Centre and seeks to retain its capacity to provide residential land uses. The proposal will provide 39 units within walking distance to a range of bus services and is approximately 200m to Edgecliff Railway Station.

It is unlikely the proposal will directly impact on the provision of public infrastructure or significantly increase demand. Therefore, the proposal is consistent with the objectives for this priority.

- **Planning Priority E3:** *Providing services and social infrastructure to meet people's changing needs.*

The planning proposal seeks to increase floor space ratio and building height to provide a mix of residential apartments on the subject site. This generation of housing opportunities will service the community within the local centre. The subject site's high accessibility to employment opportunities, local businesses, and retail and commercial services will help meet the needs of the community, an essential aspect of the Eastern City District Plan.

- **Planning Priority E4:** *Fostering healthy, creative, culturally rich and socially connected communities.*

The planning proposal seeks to increase the residential capacity in Double Bay. The proposal is consistent with the following actions in the Plan which foster strong local communities through a place-based planning approach:

Action 10: Deliver healthy, safe and inclusive places for people of all ages and abilities that support active, resilient and socially connected communities

Action 14: Strengthen social connections within and between communities through better understanding of the nature of social networks and supporting infrastructure in local places.

Future development on the subject site will feature adaptable apartments and lift access, ensuring it will be a safe and inclusive place for people of all ages and abilities. Balancing business, retail, community and residential uses in the centre is an important factor in maintaining Double Bay's desirable level of liveability. Enhancement of residential and retail floor space in the centre ensures the future viability of Double Bay as a community, social and economic centre is maintained.

- **Planning Priority E5:** *Providing housing supply, choice and affordability, with access to jobs, services and public transport.*

The planning proposal will help ensure that the New South Head Road Corridor has the capacity to provide short-term local employment opportunities during the construction phase. The inclusion of new residential lots on the site will ensure that a mixed and affordable housing supply is accessible to the community.

- **Planning Priority E6:** *Creating and renewing great places and local centres, and respecting the District's heritage.*

Double Bay is identified as a local centre in the Plan. It is intended that the planning proposal will contribute to the desired balance of diverse land uses in the centre.

The proposal is consistent with the following actions in the Plan which seek to foster strong local communities through a place-based planning approach:

Action 18: Using a place-based and collaborative approach throughout planning, design, development and management, deliver great places.

Action 22: Use flexible and innovative approaches to revitalise high streets in decline. A healthy balance of business, retail, health, community and residential uses in the centre is an important factor in maintaining Double Bay's high level of liveability.

The planning proposal will ensure that a collaborative approach is taken throughout each phase of the planning, design, development and management process. This is discussed further in Section 7.0.

The planning proposal's envelope can revitalise the streetscape by creating a built form which addresses New South Head Road with an updated contemporary facade. Contributing new residential accommodation is important to enhance the capacity of Double Bay. The vision for a local centre that meet the needs of residents and provides an appealing place that people want to live will be achievable.

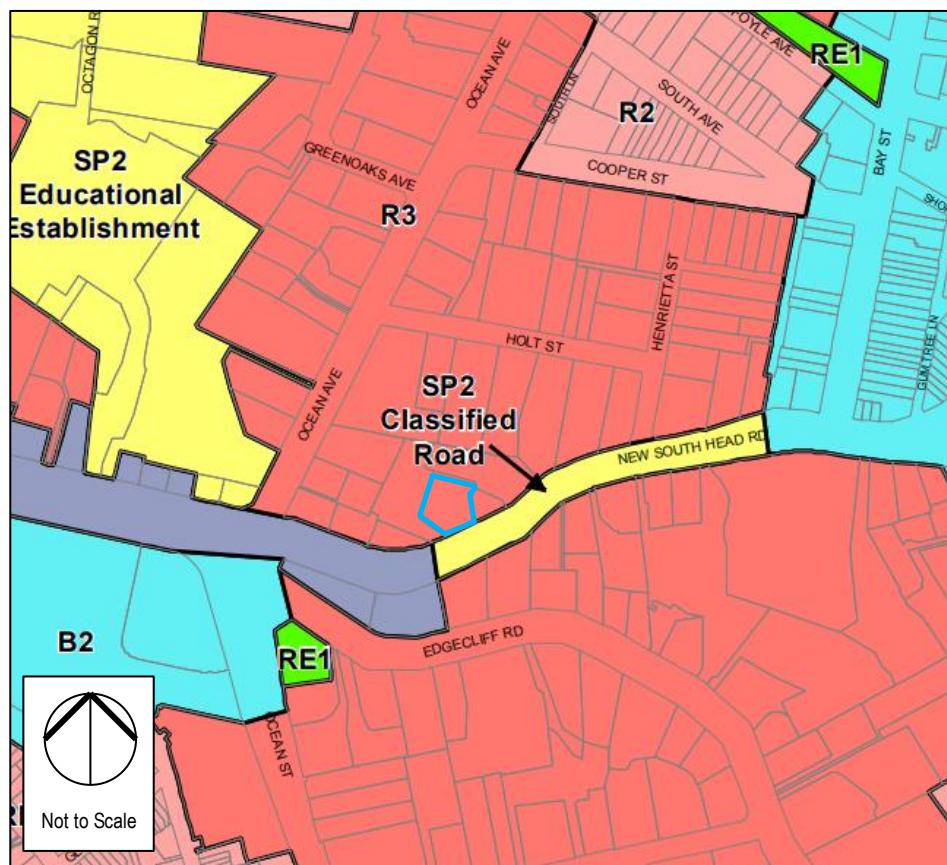
- **Planning Priority E16:** *Protecting and enhancing scenic and cultural landscapes*

The planning proposal and concept design ensures that the renewal of the subject site will protect and maintain any existing views to nearby harbours and foreshores from the site, surrounding developments and public spaces. The proposal will also contribute to the evolving cultural landscape of New South Head Road within both Double Bay and Edgecliff, which presents a variety of contemporary mixed-use and residential flat buildings.

Therefore, the planning proposal is consistent with the relevant goals and priorities of the Eastern City District Plan.

5.3 WOOLLAHRA LOCAL ENVIRONMENTAL PLAN 2014

The subject site is zoned R3 Medium Density Residential under the LEP, which commenced operation on 23 May 2015 (see Figure 11). The proposed residential flat building is permissible with development consent.



Source: Woollahra LEP 2014

Figure 11: LEP Zoning Plan

■ Subject Site

5.3.1 R3 Medium Density Residential Zone Objectives

The LEP Land Use Table contains the objectives for the R3 Medium Density Residential Zone. The relevant objectives and our response are stated, inter alia:

Objective: *To provide for the housing needs of the community within a medium density residential environment.*

Response: The increase in FSR and height will allow for the site to be uplifted with a new 7-storey residential flat building development. This will provide additional housing within the locality to meet demand.

Objective: *To provide a variety of housing types within a medium density residential environment.*

Response: The planning proposal will allow for a new residential flat building on the site, offering a mix of studio, one and two bedroom units

Objective: *To enable other land uses that provide facilities or services to meet the day to day needs of residents.*

Response: The subject site is in a highly accessible location close to public transport routes including bus and train services. The proposal will allow for facilities including shared parking, bicycle spaces, storage areas, a common lounge and lobby, and communal private open space for future residents.

Objective: *To ensure that development is of a height and scale that achieves the desired future character of the neighbourhood.*

Response: The proposal will be consistent with existing, approved and potential future developments on New South Head Road nearby. The planning proposal will provide a height and scale that offers a consistent building profile along New South Head Road.

In our opinion, the proposal satisfies the relevant objectives of the R3 Medium Density Residential Zone.

5.4 New South Head Road Corridor Strategy

We have been advised that Woollahra Council is currently developing a local strategic document which addresses the desired future character and development of New South Head Road. It appears as though the public exhibition period for this strategic document is delayed, with Council working towards its finalisation in the coming months.

Council's Opportunity site summary 'Eastern Gateway: 240–246 New South Head Road, Edgecliff (Thane Building)' provided the following key justifications for planning changes, inter alia:

- *Increasing density at within 400m of Edgecliff Centre is consistent with the well-established best planning practice of increasing development potential in centres to promote more sustainable and public transport oriented development.*
- *Urban design analysis (including overshadowing and view analysis) undertaken by consultants demonstrates that increased height and floor space ratio can be reasonably accommodated on this site.*

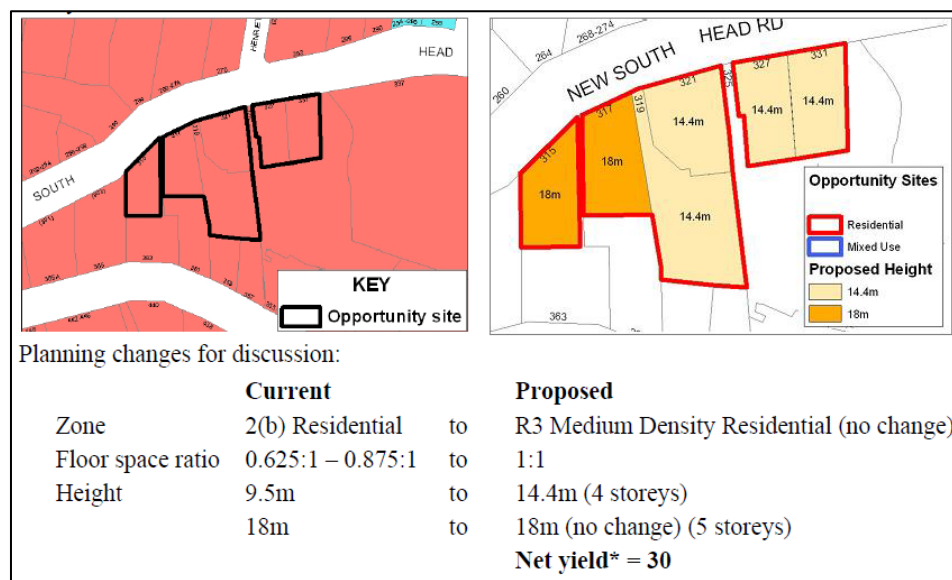
The site summary discussed a zoning change to B4 Mixed Use; an increased FSR from 0.875:1 to 4.8:1 and a height increase from 9.5m to 24.9m. The current development standards for the site are an FSR of 4.0:1 and a height of 18m with a height of 14m at the highest part of the land (Area H of Clause 4.3A(3)).

As our client is looking to progress through the planning proposal stage in a timely manner, the project team has considered the Woollahra Municipal Council's 'Opportunity Sites Study' (2010) in developing the proposed building height and FSR amendments.

5.5 Woollahra Municipal Council's Opportunity Sites Study (2010)

The Woollahra Municipal Council's 'Opportunity Sites Study' was published in June 2010 and provides a summary of information on a variety of sites with recognised potential for redevelopment across the LGA. Information provided includes the proposed height, FSR and zone that will be made available for each site.

An example of an opportunity site nearby the subject site is Nos. 315-321 and 327-331 New South Head Road, Double Bay. This site is opposite the subject site and is zoned R3 Medium Density Residential. At the time of the study, the land was occupied by a dwelling house and older style residential flat buildings, some of which were in very poor condition (see Figure 12).



Source: Woollahra Council, 2010

Figure 12: Existing and Proposed Zoning, Height and FSR at Nos. 315-321 and 327-331 New South Head Road

The Study presented the following reasoning for the potential LEP amendments, inter alia:

- Site contains older building stock.
- RFBs are the predominant building form and define the character of the area.
- Reasonable to provide for redevelopment opportunities that are consistent with the prevailing context.
- Redevelopment presents opportunity to improve the pedestrian amenity along this part of New South Head Road.
- Site is well located to the Double Bay centre and access to public transport and services.

On the **11 March 2013**, No. 315-317 New South Head Road received an approval by Woollahra Council for the demolition of the existing residential flat buildings and construction of a new 4-storey residential flat building containing 24 residential apartments, 2 levels of basement carparking, subdivision, landscaping and siteworks (see Photograph 16 on the following page). Since its approval, multiple Section 4.55 (cf previously Section 96) modifications have been approved.



Photograph 16: New Residential Flat Building at No. 315-317 New South Head Road

Another site identified in the Opportunity Sites Study is Nos. 203-233 and Nos. 235-285 New South Head Road. This site is approximately 200m from the subject site and comprises the eight-storey Edgecliff Centre; Edgecliff Station; bus interchange; commercial premises; retail components; and car parking. Amendments to the LEP for development on this site include the following:

- Amend the FSR on site from 2.5:1 to 6.05:1; and
- Amend the height on site from 26m to 53m (17 storeys).

The existing urban form on the Edgecliff Centre site has low amenity, and the accessibility and functionality of public transport services and shopping centres could be greatly improved through redevelopment and street activation (see Figure 13). This includes increasing density to promote public transport-oriented development; high dwelling yield; and uniting two sites that currently function separately.



Source: Woollahra Council, 2010

Figure 13: Edgecliff Centre 3D Model, as viewed from the west on New South Head Road

The proposed amendments to the LEP height and FSR controls are in excess of the proposed height and FSR amendments to the subject site, displaying the growing trend of maximising the potential of underutilised sites on this major road. The planning proposal will allow for similar redevelopment to occur at a scale complementary to adjoining and nearby development.

Therefore, the planning proposal is, in our opinion, consistent in height and FSR with sites nearby identified in the Woollahra Municipal Council's Opportunity Sites Study 2010.

5.6 WOOLLAHRA DCP 2015

To ensure the potential residential flat building development proposed can be achieved on the site, we propose modifications to the DCP to include site-specific controls. These would relate to items such as, inter alia:

- Setbacks to ensure solar access and separation;
- Minimal parking requirements given the proximity to public transport;
- Privacy measures to protect amenity of nearby developments;

Further controls and their implementation will be examined at the Planning Proposal stage.

6.0 STRATEGIC MERIT

The planning proposal has strong strategic merit, with key reasons to amend the Woollahra LEP 2014 including:

- Consistent with the *Greater Sydney Region Plan: A Metropolis of Three Cities*; and the *Eastern City District Plan*;
- Identified station sites nearby the subject site have potential for heights up to 17 storeys;
- Offers a building height consistent with comparable local centres and corridors with a similar role as New South Head Road;
- Optimises site use for future growth based on a transit-oriented development approach and accentuating prominent locations, including core areas;
- Complementary use to the surrounding residential uses;
- Close to various public transport connections:
 - Approximately 110 metres to the New South Head Road bus network;
 - Approximately 220 metres to train and bus services from Edgecliff Railway Station and Bus Interchange, including airport services;
 - Local buses service nearby ferry terminals including Double Bay for services to Circular Quay, Manly, Garden Island, Rose Bay, and Watsons Bay; and
 - CBD and Domestic and International Airports.
- Proximity to nearby uses:
 - Approximately 350m from Double Bay shopping centre; and
 - Approximately 220m from Eastpoint Food Fair and other retail and commercial services in Edgecliff.

7.0 ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACTS

Documents including a Traffic Report, Geotechnical Report, Urban Design Report, and Contamination Report are to be prepared at a later stage for the Planning Proposal. Potential environmental impacts and how they will be managed will be outlined in these reports.

The planning proposal seeks to enhance residential space, in turn contributing to the revitalisation of the Double Bay Local Centre and greater New South Head Road Corridor through generating residential accommodation compatible with current housing needs and quality expectations. The planning proposal will create a number of positive social and economic outcomes, including:

- Revitalising the site and providing a high-quality development in a central location;
- Increasing commercial floor space in the locality to provide employment opportunities;
- Maintaining high standards of visual quality;
- Providing residential-based uses nearby transport services and Sydney's CBD; and
- Additional employment during the construction process.

The planning proposal enforces the objectives for the R3 Medium Density Zone and promotes increased development in order to revitalise the Double Bay Local Centre. The subject site is near an abundance of public transport and retail services. With a minor increase in permanent residents, additional social infrastructure is likely to be unnecessary.

In addition, social benefit has been considered in the proposal through the inclusion of smaller-sized apartments. These will cater to a range of age groups, and potentially provide more affordable housing options within the locality.

Additionally, the planning proposal and proposed development on the subject site has considered any potential heritage implications of the proposed amendments to the LEP. The subject site is not a heritage item and is not located within a Heritage Conservation Area, however is within the vicinity of heritage items at No. 337 New South Head Road, No. 287-289 New South Head Road, and Ocean Road. As the existing use will be maintained and the concept design for a new residential flat building respects the surrounding character of the area, it is unlikely to have any impacts on these heritage items.

Accordingly, in our opinion, the planning proposal addresses the social and economic effects of amending the LEP.

8.0 MAPPING

8.1 BUILDING HEIGHT

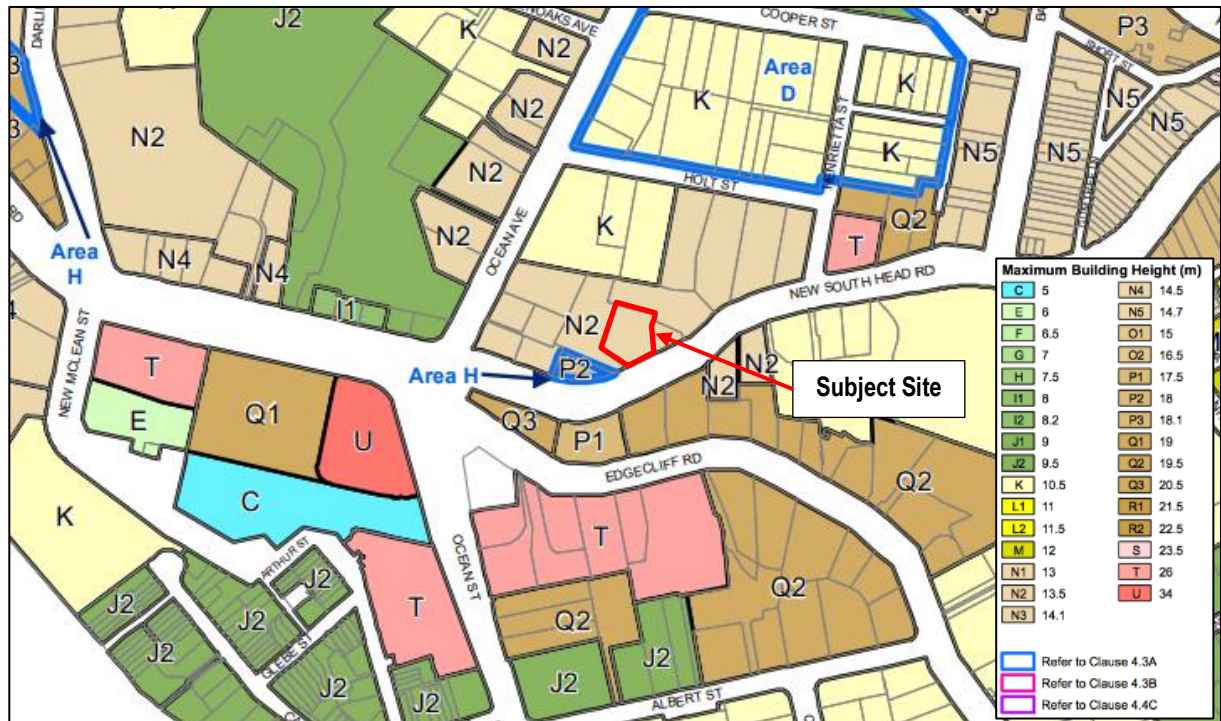


Figure 14: Current Height of Buildings Map Sheet HOB_003

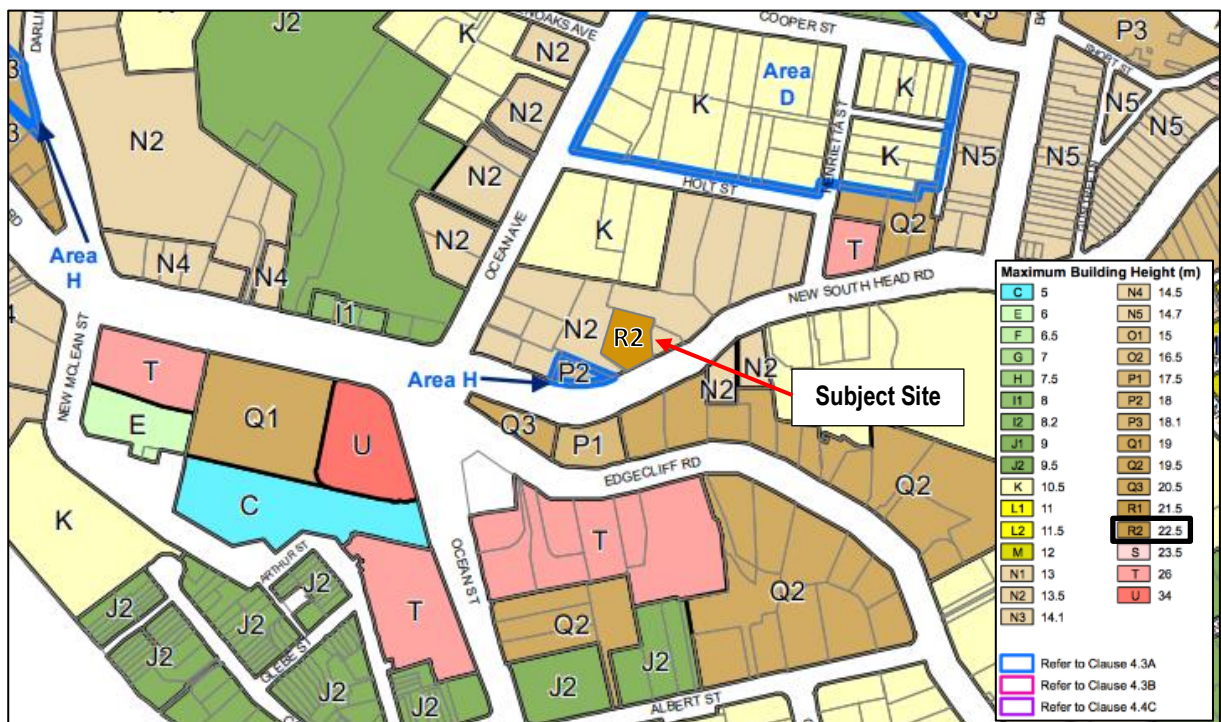


Figure 15: Proposed Height of Buildings Map Sheet HOB_003

R2 = 22.5 metres

8.2 FLOOR SPACE RATIO

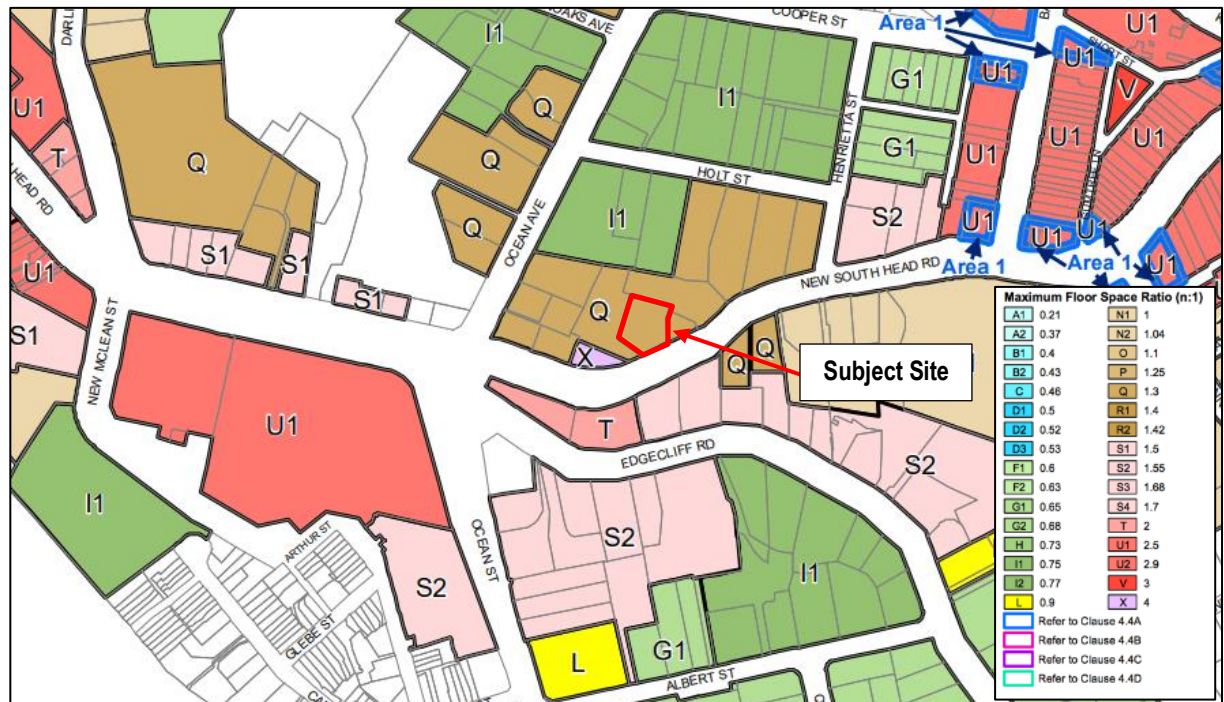


Figure 16: Current Floor Space Ratio Map Sheet FSR_003

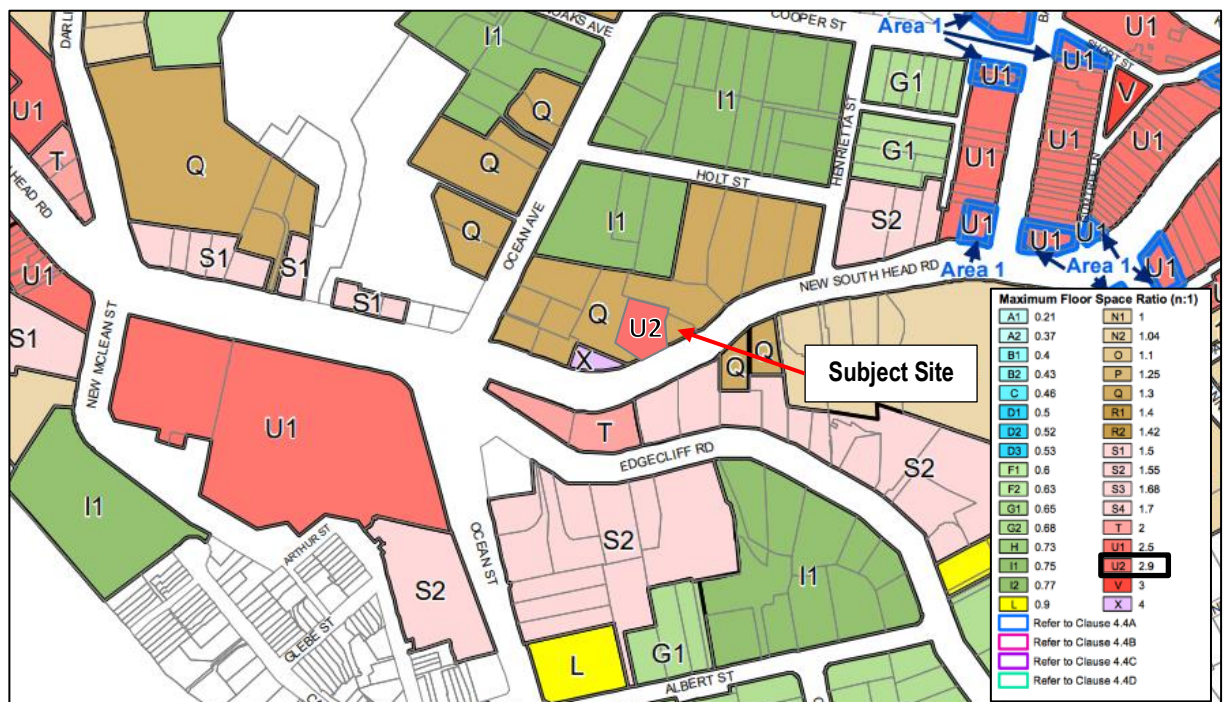


Figure 17: Proposed Floor Space Ratio Map Sheet FSR_003
U2 = 2.9:1

9.0 CONCLUSION

This submission outlines key planning principles that are considered in the preliminary planning proposal and concept plans. Through allowing an increase in the building height and FSR on the subject site, it will allow for orderly development in a growing local centre, with abundant supporting infrastructure and services.

In our assessment, the planning proposal has strategic merit and is consistent with the objectives of the *Greater Sydney Region Plan - A Metropolis of Three Cities* (2018); the actions and planning priorities of the *Eastern City District Plan* (2018); is a thoughtful response to the evolving character of the area; and has general strategic merit in its context.

The proposed height and corresponding increase in FSR recognise the existing and future character, and the importance of Double Bay and nearby Edgecliff as a transport and retail hub. The height and FSR will be compatible contextually, by replacing the under-maintained existing building with the opportunity for a revitalised residential flat building that positively addresses the streetscape.

The amendments to the height and FSR controls recognise the importance of maintaining amenity for nearby developments. As discussed in this report, Antoniades Architect's concept plans for a residential flat building which is sensitive to maintaining solar access, views, and acoustic and visual privacy to residential buildings nearby the subject site. The form maintains views and minimises shadows. Amendments to DCP controls will ensure the intent of the proposed residential flat building can be implemented in the future development application.

For the reasons outlined in this submission, we propose amendments to the Woollahra LEP 2014 Maps to allow site-specific changes at No. 252-254 New South Head Road, Double Bay, and seek Council's support.