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<b>Your Reference</b>	RR_2021_84
<b>Our Reference</b>	RZ/1/2019
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Via email: [Peter.Pham@planning.nsw.gov.au](mailto:Peter.Pham@planning.nsw.gov.au)

**25 August 2021**

Dear Mr. Pham,

**RE: Request for a rezoning review – RR\_2021\_84\_ 93 Bridge Road, Westmead**

I refer to your letter dated 4 August 2021 advising that the Applicant for land at 93 Bridge Road, Westmead has requested a rezoning review. This letter provides a response to the revised Planning Proposal and an explanation for why this Proposal was not considered by Council within 90 days of lodgement.

**1. Background**

A Planning Proposal for land at 93 Bridge Road, Westmead was received by Council in March 2019 seeking to increase the floor space ratio (FSR) from 1.7:1 to 6:1 and increase the height of buildings (HOB) from 20m to 132m (40 storeys) for the purpose of residential accommodation, hotel and motel accommodation and serviced apartments.

An assessment of this Proposal was undertaken by Council Officers who raised numerous concerns relating to density, urban design, open space, traffic and transport, social outcomes, and overall strategic merit. Concern was raised that the proposal is an overdevelopment of the site, is not a suitable location for a 'micro-hub', and if accepted, would set an undesirable precedent for the Westmead precinct. The Applicant was advised in writing of these concerns in July 2020.

On 23 December 2020, the Applicant submitted a revised Planning Proposal with alterations to the original Proposal. The revised Planning Proposal sought to introduce two options with different built form outcomes. This includes the 'added value proposal' proposing an FSR of 6:1 and HOB of 132m (40 storeys). An alternative 'base case proposal' was also included to provide a lower scale option with a reduced FSR of 4.5:1 and reduced HOB of 78m (22 storeys). The Applicant requested a meeting with Council officers to discuss the revised Proposal.

On 10 December 2020, the DPIE released a draft Westmead Place Strategy for public exhibition until 31 March 2021. Council officers informed the Applicant of the ongoing review and preparation of Council's submission to the Westmead Place Strategy which may have implications on Council's position on the subject planning proposal.

On 29 January 2021, Council officers advised against any further meetings on the proposal until such time that Council had adopted a position on the Westmead Place Strategy. Council officers broadly indicated that the

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revised Planning Proposal remained problematic and had not adequately addressed the concerns raised compared to the original proposal.

At Council's meeting of 22 March 2021, Council considered the draft submission to the Westmead Place Strategy, and resolved:

- (a) **That** Council approve the submission on the draft Westmead Place Strategy to the Department of Planning, Industry and Environment (DPIE) at Attachment 2 subject to it being amended to:
  - Include a request that the Heritage Precinct containing the Former Female Factory and associated nationally listed items be formally recognised as part of the Parramatta Park to be managed by the Parramatta Park Trust in conjunction with the World Heritage Listed Old Government House
  - Include a recommendation that tourism opportunities, including heritage-based tourism and medical tourism be investigated as part of the proposed Place Brand Strategy or in a separate Tourism Strategy for Westmead.
- (b) **That** Council note that a key element of Council's response to the draft Strategy is the need for the Department to complete the traffic and transport work proposed in the draft Strategy prior to any Strategy being endorsed by the Minister.
- (c) **That** Council endorse staff preparing a report on the risks and benefits of Council suspending consideration of Planning Proposals and assessment of Development Applications, unless the proposals or applications relate solely to increasing and/or supporting community health services, until the Minister for Planning and Public Spaces has approved the Strategy based on a comprehensive traffic and transport study, and Council has completed the analysis and consultation required to determine land use and density controls that are consistent with the Strategy.
- (d) **Further, that** the Lord Mayor and Ward Councillors meet the Minister and relevant officers with a view to putting forward Council's position as to costs and opportunities in Westmead.

In accordance with Council's resolution (c), Council officers will further investigate the merit of suspending consideration of site-specific Planning Proposals acknowledging that broader strategic work is being undertaken for the wider Westmead precinct. A copy of the Council report and Council's submission to the draft Westmead Place Strategy is included in **Attachments 1** and **2** respectively.

In August 2021, Council officers were informed that a request for a rezoning review was submitted by the Applicant to the Department of Planning and Environment (DPIE) for consideration by the Sydney Central Planning Panel. The request was made on the grounds that Council has not made a determination on the Proposal within 90 days of lodgement.

Please find below Council officers' justification for recommending that this revised Planning Proposal not be progressed.

## **2. Assessment of Planning Proposal**

It is considered premature to progress the assessment of the site-specific Planning Proposal for 93 Bridge Road, Westmead for the following reasons:

### **2.1 Broader strategic work is underway**

Further strategic work at the precinct level is being undertaken as part of the draft Westmead Place Strategy which would have implications on the assessment of site-specific planning proposals within the precinct. In its submission to the draft Westmead Place Strategy (Strategy), Council recommended that further technical work and amendments needed to be completed prior to the finalisation of the Strategy. Consistent with point (b) of Council's resolution, Council's submission reiterated the need to complete a comprehensive precinct-wide traffic and transport study to support the draft Strategy. This is critical to understanding cumulative traffic impacts prior to any significant changes to land uses and planning controls.

It is noted that Transport for NSW (TfNSW) has commenced work on the precinct wide traffic and transport study. It should be noted that at present, only stage one of a two-stage process has been funded. The first stage of the work is more vision and principle based, while stage two will result in outputs that enable Council or DPIE to undertake an informed rezoning. TfNSW staff have advised that it is planned that Stage 1 will be completed by end of October 2021 whilst scoping and funding for Stage 2 is yet to be confirmed.

## **2.2 Preparation of a further report to Council**

In accordance with point (c) of Council's resolution, Council officers will further investigate the risks and benefits of suspending consideration of site-specific Planning Proposals and assessment of Development Applications. This is unless the proposals or applications relate solely to increasing and/or supporting community health services, until the Minister for Planning and Public Spaces has approved the draft Westmead Place Strategy based on a comprehensive traffic and transport study, and Council has completed the analysis and consultation required to determine land use and density controls that are consistent with the Strategy. The report on the matter is yet to be brought forward for Council's consideration.

It is noted that the Planning Proposal for 93 Bridge Road proposes high density residential development rather than facilitate an increase or support community health services. Furthermore, there has been no further update on the draft Strategy and the technical studies required to support the work. The draft Strategy is proposed to be implemented through a Section 9.1 Ministerial Direction, which under section 9.1(2) of the *Environmental Planning and Assessment Act 1979* allows the Minister of Planning to require that future rezoning and development within the Precinct is consistent with the Final Westmead Place Strategy. The draft Strategy indicated that a Ministerial Direction will be issued by the Minister in June 2021. To date, no further updates have been released in relation to the draft Strategy or associated Ministerial Direction.

## **2.3 Outstanding planning issues**

Council officers have concerns regarding the ability of the Planning Proposal and its intended density of development to have a positive influence on the Westmead Precinct. In Council's submission to the draft Westmead Place Strategy, concern was raised that Council may set an undesirable precedent for amendments to land use and density and height controls in the Westmead precinct should the proposal for 93 Bridge Road be supported in its current form. This would pose the risk of being perceived by other landowners as the benchmark for density notwithstanding that the density under the revised Proposal cannot be supported on built form and traffic grounds.

Further, Council officers have reviewed the revised Proposal and are not satisfied that the concerns relayed to the Applicant have been addressed including issues in relation to density, urban design, open space, traffic and transport, social outcomes and overall strategic merit. An assessment of outstanding planning issues is provided below:

### **2.3.1 Strategic Merit**

An assessment of the Planning Proposal against the State Government's *Central City District Plan (District Plan)*, *Greater Parramatta and Olympic Peninsula (GPOP)* documents and *draft Westmead Place Strategy (Strategy)* identifies no clear direction to suggest that the densities proposed in the Planning Proposal are appropriate for this location. In its submission to the draft Strategy, Council noted that the Strategy was unclear in terms of the level of density/intensification that would be appropriate throughout the precinct although specific areas of housing opportunity were identified. It should be noted that the draft Strategy identified the Planning Proposal site as 'existing residential' rather than an area for urban renewal or future housing opportunity.

While Council acknowledges that some increase in density could be achieved on the site, it does not consider the proposed density to be appropriate for this location or within the broader Westmead context. The subject site is located at the periphery of the Westmead Precinct and is located over 1km away from the Westmead transport interchange. The revised Proposal is not cognisant of this constraint and does not propose an

appropriate density that could be suitably and hypothetically applied to neighbouring sites.

Under Council's Local Housing Strategy (2020) and Local Strategic Planning Statement (2020), it is identified that the Westmead precinct will accommodate 4,470 additional homes to 2036 and this will be an important factor supporting the workforce in the precinct. Notwithstanding this, further technical work is required to be undertaken to determine the appropriate land use, density and height controls for the wider precinct.

### 2.3.2 Building Heights and Aviation Report

The site is in close proximity to the Westmead Hospital helipad (A&E) and current flight paths. The Westmead Hospital helipad is located approximately 850m north-east of the site. The Applicant is still yet to provide an Aviation Report to demonstrate that the proposed increase in height does not compromise helicopter operations. The Aviation Report must use up to date flight paths, consider future flight paths once the helipad at the new Acute Services building commences operations, and include the outcomes of consultation with the Western Sydney Local Health District.

### 2.3.3 Urban Design

Council officers acknowledge that some increase in density can be achieved in Westmead, however, it should be of a scale that is not only responsive to the future strategic vision for the Westmead Precinct (which is still yet to be finalised via the Westmead Place Strategy) but also considers the local context. The revised Planning Proposal provides two options which are outlined in **Table 1**:

		2019 Proposal		2020 Proposal	
Planning Control	Current PLEP	Original Proposal	'Base Case' Proposal (Option 1)	'Added Value' Proposal (Option 2)	
Zoning	R4 High Density Residential	No change to zoning (noting 'hotel or motel accommodation' and 'serviced apartments' are sought as APU)	No change to zoning (noting 'hotel or motel accommodation' and 'serviced apartments' are sought as APU)	No change to zoning (noting 'hotel or motel accommodation' and 'serviced apartments' are sought as APU)	
Floor Space Ratio	1.7:1	6:1	4.5: 1	6:1	
Maximum Building Height	20m	132m (40 storeys approx..)	78m (22 storeys approx..)	132m (40 storeys approx..)	
Dwelling Yield	N/A, existing development primarily comprises of three storey walk ups in garden settings.	747 dwellings (comprising 424 private residences, 300 student accommodation and 23 short-term NDIS accommodation)	470 dwellings (comprising 370 private residences, 100 student accommodation)	837 dwellings (comprising 112 private residence, 402 built to rent, 323 student accommodation)	

**Table 1: Proposed Controls under Planning Proposal**

The proposal constitutes a substantial overdevelopment of the site given the context of the locality. Development within Bridge Road generally comprises of three storey walk up apartment buildings in garden settings and the Planning Proposal site itself is a substantial distance from the proposed Westmead transport interchange, Wentworthville Station, and amenities including shops and open space.

The Applicant was requested to revise the proposal to address key urban design principles outlined below:

#### *Street Network Principles*

The street network is to:

- ensure that all buildings have a street address;
- provide views to sky at the ends of the street;
- facilitate connections to the riparian zone on the east and possible future connections to the riparian zone on the west;
- provide a public edge to the riparian zone; and
- ensure appropriate configuration for the new proposed street. The proposed new street on the boundary between 93 Bridge Street and 105 Bridge Street is generally supported (with visions of it extending further to Hawkesbury Road). At a minimum, the street will be 20m wide with a land take of approximately 10 metres from both the subject and adjoining site. Of the 10 metres to be provided by both sites, 3.5m is to be provided for the carriageway, 2.1m for a parking lane and 4.4m for a footway with landscaped verges. It should be clarified whether it is intended that this roadway be provided to Council or if only the land will be dedicated to Council.

#### *Built Form Principles*

The built form is to:

- incorporate podia of 4 to 6 storeys;
- ensure towers are 45m long maximum;
- avoid L shaped and connected towers as these are not permitted;
- ensure that buildings align with streets and suitably located to minimise perceived density;
- ensure that upper storeys of buildings do not overhang lower level;
- ensure that tower footprints have a maximum GFA no greater than 900m<sup>2</sup>;
- ensure taller buildings are suitably located to reinforce the street and open space network and create a positive relationship between the development on 105 Bridge Road and 93 Bridge Road;
- provide suitable street setbacks including 6m to all new streets (assuming residential at ground) to allow for deep soil in accordance with ADG requirements, nil setbacks for non-residential where applicable and appropriate setbacks for towers above podia to suit the overall massing and design; and
- ensure that basement car parking is located predominantly under the footprint of buildings.

The Urban Design Report is required to provide a section detailing how the revised Planning Proposal has considered these important principles. It is considered that the revised Planning Proposal has not clearly and adequately addressed the identified urban design principles. Council officer assessment of the revised Planning Proposal against the street network and built form principles are provided in **Attachment 3**.

#### **2.3.4 Social Outcomes**

In its submission to the draft Westmead Strategy, Council identified that the Strategy did not identify the range of social infrastructure required to support the desired growth in the Westmead precinct. Council's submission recommends that the infrastructure needs of Westmead need to be clearly defined, with local and state infrastructure identified, costed, and appropriate funding mechanisms put in place prior to the Strategy being finalised and implemented. This would inform the assessment of site-specific proposals including the current proposal for 93 Bridge Road, Westmead. Additionally, the draft Strategy would benefit from a review of Council's Community Infrastructure Strategy (CIS) which has been finalised and identifies the needs for additional community infrastructure including community hubs, indoor recreation facilities, childcare and



affordable rental housing to support the projected population growth in Westmead.

#### *Community Infrastructure Demand*

The scale of development proposed in the Planning Proposal is considered extreme. It is considered that existing community infrastructure would not have capacity to absorb the increased population needs associated with the proposal. Using current Westmead rates, the provision of 837 dwellings under the 'added value' proposal would result in an increased population of 2,134 residents. On the other hand, the provision of 470 dwellings under the 'base case' proposal would result in an increased population of 1,198 residents.

Industry benchmarks suggest that the 'added value' proposal would generate demand for an additional 2.1 hectares of park space, 155 childcare/OOSH places and 261m<sup>2</sup> of indoor community space. On the other hand, the 'base case' proposal would generate demand for an additional 1.2ha of park space, 88 childcare/OOSH places and 146m<sup>2</sup> of indoor community space.

#### *Planning Agreement Offer – Community Facilities*

It is acknowledged that community facilities are required in Westmead to service both the current and projected population in the area. The amended VPA letter of offer (dated 22 February 2021) includes the on-site provision of a community facility sized at 250m<sup>2</sup> under the 'base case' proposal or sized at 1,000m<sup>2</sup> under the 'added value' proposal.

The Council-endorsed CIS envisages a 3,000m<sup>2</sup> community facility to service Westmead located along Hawkesbury Road and as close as possible to the future transport interchange. It is Council's preference that a monetary contribution be made to facilitate the future development of a community facility closer to the desired location as identified in Council's CIS as part of VPA negotiations should this proposal proceed to Gateway Determination.

#### *Open Space Provision*

Open space is required in Westmead to support both the current and projected populations. In its submission to the draft Westmead Place Strategy, Council noted that there needs to be further resolution of open space provision at the precinct-level. The draft Strategy does not propose sufficient or well-designed open space to support workers, students and residents currently or in the future.

Furthermore, it is noted that Council's CIS identified a lack of active and passive open space and recreational facilities in Westmead. As a result, Council reiterated that a key priority should be the expansion of the riparian corridor along Parramatta River, Toongabbie Creek and Darling Mills Creek of between 20 to 40 metres and to provide playing field space. As previously mentioned, Council also recommended that the draft Strategy should identify, cost and plan for open space needs for Westmead. These matters at the precinct level need to be resolved prior to the progression of site-specific planning proposals including the current proposal for 93 Bridge Road, Westmead.

Upon review of the revised Planning Proposal, Council officers generally support on-site provision of open space. However, it is acknowledged that it is likely to function more as communal open space for the benefit of the residents in the subject development. Public open space must be legible to members of the community and must be unencumbered. Council is willing to explore options for community access to open space on the site. Nonetheless, Council would need to be satisfied that suitable arrangements are in place to ensure that there are no unreasonable impacts on the availability of communal open space for the development which is also important.

#### *Affordable Housing*

In its submission to the draft Westmead Place Strategy, Council recommended that the draft Strategy set affordable housing targets associated with provision of a percentage of the uplift value within new developments, being 10%, to align with actions in the *Plan for Growing Sydney*. Similarly, the incorporation of such targets in the draft Strategy would inform the assessment of site-specific planning proposals such as the current proposal for 93 Bridge Road, Westmead.

It is noted that while the original proposal (2019) made reference to affordable housing, the revised Planning Proposal has omitted any reference to affordable housing. Instead, the revised Planning Proposal has outlined

that build to rent units are included under the 'added value' proposal but not included in the 'base case' proposal. Build to rent units are not ordinarily considered to be affordable housing. Broadly, Council officers are willing to explore on-site provision of affordable housing, and how this might be delivered and managed. The Planning Proposal site would be a suitable location for affordable housing which would be well-placed to support the key worker population in Westmead.

### **2.3.5 Traffic and Transport**

In its submission to the draft Westmead Place Strategy, Council reiterated the need to complete the precinct wide traffic and transport study proposed in the strategy prior to its finalisation. A comprehensive traffic and transport study would determine the capacity of Westmead to accommodate proposed uses, and also determine the density of activity that can be sustained. Furthermore, Council noted in its submission that the Strategy should provide broader indication that this key study should underpin many of the other technical bodies of work to be undertaken within the precinct.

As previously mentioned, TfNSW has commenced work on the precinct wide traffic and transport study. It should be noted that at present, only stage one of a two-stage process has been funded. The first stage of the work is more vision and principle based, while stage two results in outputs that enable Council or DPIE to undertake informed rezoning decisions. In the absence of a comprehensive traffic and transport study, it is considered premature to assess site-specific planning proposals including the current proposal for 93 Bridge Road without understanding the cumulative impacts and flow-on effects on the broader traffic network and capacity.

#### *Cumulative Traffic Impacts*

If applied across the precinct, the controls sought under this Planning Proposal would result in considerable traffic impacts in the Westmead Precinct and adverse traffic impacts on Westmead Hospital operations. The Precinct is already constrained in terms of traffic and access and this has been made evident via Council's opposition to the State-Significant Development proposal for the Westmead Catholic Education Precinct on traffic grounds. It is Council's position that any Planning Proposal must not result in excessive traffic impacts, particularly if it is proceeding ahead of the traffic and transport study currently being completed in Westmead.

The submitted Transport Assessment (Assessment) recognised that the precinct wide traffic and transport study is currently being undertaken to identify the required upgrades to enable the desired growth in the precinct. The Assessment itself noted that following improvement in public transport, the situation would be significantly different, and it would be hard to understand the transport conditions of future years.

Council's Traffic Engineers have raised concerns in relation to the assumptions and scope of the Assessment and associated traffic model. The traffic model for 2029 is limited and the Assessment does not take into account developments proposed for the precinct including the Catholic Education Precinct, proposed public school or other development on the nurses' accommodation site in Bridge Street.

Overall, the comprehensive traffic and transport study will need to be completed to support any change in planning controls within the Westmead precinct. Although the Planning Proposal site is approximately 1.1km away from the transport interchange, this does not justify the proposed increase in FSR from 1.7:1 to either 4.5:1 or 6:1 under the 'base case' and 'added value' proposal respectively.

#### *Car parking rates*

It is recommended that RMS parking rates be applied for the residential component of the planning proposal in order to minimise the parking provision and, consequently, to minimise traffic implications. The submitted site-specific DCP is required to be amended to apply RMS parking rates should the proposal proceed.

### **2.3.6 Economic Development**

In its submission to the draft Westmead Strategy, Council noted that the draft Strategy calls for Westmead to be an 'economic powerhouse' for Western Sydney and Australia. However, the information provided through the draft Strategy does not provide the relevant analysis to support its conclusions or assumptions. Council

recommended the inclusion of technical inputs within the draft Strategy to underpin predictions in population growth and economic forecasting.

It is noted that the draft Strategy identified specific areas for 'mixed use' (retail, commercial and residential) and 'mixed use' (health focus) in locations in close proximity to Westmead Private Hospital as identified in Sub-Precinct 2 – Health and Innovation Precincts. While these mixed-use areas could be interpreted as 'micro-hubs', further clarification is required as to the proposed 'mixed use' land uses proposed under the draft Strategy. As previously noted, the Planning Proposal site was identified as 'existing residential' under the draft Strategy rather than a 'mixed-use' area.

#### *Micro-hub*

The creation of a 'micro-hub' is not supported in this location. The revised Planning Proposal contemplates the creation of a 'micro-hub' with a range of land uses to complement the Westmead Health and Education Precinct. It is not considered that the provision of ancillary uses such as student or NDIS housing justifies the high FSR proposed for the site. The creation of a micro-hub in this location is not supported due to key limitations principally related to the site's location. The site is not in immediate proximity to Westmead Hospital, the future Westmead transport interchange, and the proposed Sydney University campus to justify development of the scale and density proposed under either the 'base case' or 'value added' development scenarios.

#### *Additional Permitted Use*

The revised Planning Proposal proposes to include 'hotel or motel accommodation' and 'serviced apartments' as additional permitted uses within the R4 High Density Residential zone. Concern is raised that this presents a risk in that this may result in future development comprising predominantly or entirely of this use. The introduction of additional permitted uses in the R4 zone should be capped to mitigate these risks. The revised Planning Proposal should be amended to address this issue should the proposal proceed to Gateway Determination.

### **3. Conclusion**

Based on the information included in this correspondence, Council officers have fundamental concerns with the submitted planning proposal for 93 Bridge Road, Westmead. These concerns were communicated to the Applicant throughout the assessment process and provide justification for this Proposal not progressing at the scale proposed or at an earlier time.

Should you wish to discuss this matter further please contact Jema Samonte, Senior Project Officer on 9806 5753.

Regards,



**David Birds**  
Group Manager – City Planning



### Attachment 3 – Assessment of Revised Planning Proposal against Urban Design Principles

Urban Design Principle	Council Officer Comments
<b>Street Network Principles</b>	
The street network is to ensure that all buildings have a street address.	Satisfactory. Additional shared streets were introduced to help ensure all buildings have a street address.
The street network is to provide views to sky at the ends of the street.	It is unclear if the revised Planning Proposal has addressed this urban design principle. Further information is required for assessment.
The street network is to facilitate connections to the riparian zone on the east and possible future connections to the riparian zone on the west.	It is unclear if the revised Planning Proposal has addressed this urban design principle. Further information is required for assessment.
The street network is to provide a public edge to the riparian zone.	It is unclear if the revised Planning Proposal has addressed this urban design principle. Further information is required for assessment.
The street network is to ensure appropriate configuration for the new proposed street. The proposed new street on the boundary between 93 Bridge Street and 105 Bridge Street is generally supported (with visions of it extending further to Hawkesbury Road). At a minimum, the street will be 20m wide with a land take of approximately 10 metres from both the subject and adjoining site. Of the 10 metres to be provided by both sites, 3.5m is to be provided for the carriageway, 2.1m for a parking lane and 4.4m for a footway with landscaped verges. It should be clarified whether it is intended that this roadway be provided to Council or if only the land will be dedicated to Council.	It is unclear if the revised Planning Proposal has addressed this urban design principle. Further information is required for assessment including details of the relevant road cross-section.
<b>Built Form Principles</b>	
The built form is to incorporate podia of 4 to 6 storey.	Satisfactory. It appears that the revised Planning Proposal has addressed this urban design principle.
The built form is to ensure towers are (maximum) 45 metres long.	It is unclear if the revised Planning Proposal has addressed this urban design principle. Further information is required for assessment.
The built form is to avoid L shaped and connected towers as these are not permitted.	Satisfactory. It appears that the revised Planning Proposal has addressed this urban design principle.
The built form is to ensure that buildings align with streets and suitably located to minimise perceived density.	It is unclear if the revised Planning Proposal has addressed this urban design principle. Further information is required for assessment.



The built form is to ensure that upper storeys of buildings do not overhang lower level.	It is unclear if the revised Planning Proposal has addressed this urban design principle. Further information is required for assessment.
The built form is to ensure that tower footprints have a maximum GFA no greater than 900m <sup>2</sup> .	It is unclear if the revised Planning Proposal has addressed this urban design principle. Further information is required for assessment.
The built form is to ensure taller buildings are suitably located to reinforce the street and open space network and create a positive relationship between the development on 105 Bridge Road and 93 Bridge Road.	It is unclear if the revised Planning Proposal has addressed this urban design principle. Further information is required for assessment.
The built form is to provide suitable street setbacks including 6m to all new streets (assuming residential at ground) to allow for deep soil in accordance with ADG requirements, nil setbacks for non-residential where applicable and appropriate setbacks for towers above podia to suit the overall massing and design.	The revised Planning Proposal has not addressed this urban design principle. Setbacks within the Urban Design Report do not meet these requirements.
The built form is to ensure that basement car parking is located predominantly under the footprint of buildings.	Satisfactory. It appears that the revised Planning Proposal has addressed this urban design principle.