

DA NO: DA-2021/189/A

ADDRESS: 48 CHANDOS STREET, ST LEONARDS NSW 2065.

PROPOSAL: MODIFY ORIGINAL PROPOSAL TO INCLUDE CHANGES TO CONDITIONS OF CONSENT WORDING, INFILL GROUND LEVEL APPROVED UNDER CROFT PARKING AREA TO A NEW COMMERCIAL SUITE, AMEND DESIGN OF OSD TANK AND ASSOCIATED WORKS.

RECOMMENDATION: APPROVAL

ATTACHMENTS:

1. SITE DESCRIPTION AND AERIAL PHOTO
2. DEVELOPMENT CONTROLS, STATISTICS, DEVELOPER CONTRIBUTION & REFERRALS
3. ASSESSMENT UNDER *WLEP*
4. ASSESSMENT UNDER *WDCP*
5. SECTION 4.55 ASSESSMENT
6. SECTION 4.15 (79C) ASSESSMENT
7. SUBMISSIONS TABLE
8. SCHEDULE OF CONDITIONS
9. NOTIFICATION MAP

RESPONSIBLE OFFICER: RITU SHANKAR - TEAM LEADER

AUTHOR: PATRICK WILLIAMS - DEVELOPMENT ASSESSMENT OFFICER

REPORT DATE: 21 FEBRUARY 2023

MEETING DATE FOR PUBLIC MEETING: 28 FEBRUARY 2023

1. PURPOSE OF REPORT

The purpose of this report is to seek determination by Willoughby Local Planning Panel (WLPP) of modification application DA-2021/189/A. The application seeks consent to modify the original proposal for modify original proposal to include changes to conditions of consent wording, infill ground level approved under croft parking area to a new commercial suite, amend design of osd tank and associated works at 48 Chandos Street, St Leonards.

The application is required to be referred to the WLPP for determination because the proposed modifications result in a further breach of the Development Standard 4.4- Floor Space Ratio, a development to which the State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development applies and has received over 10 submissions.

2. OFFICER'S RECOMMENDATION

THAT the Willoughby Local Planning Panel:

- 2.1 Support the exceedance of the floor space ratio (FSR) development standard as it is unreasonable and unnecessary to comply with the development standard of Clause 4.4 *Willoughby Local Environmental Plan 2012* (Floor space ratio). The gross floor area exceeds the development standard for the following reasons:

- 2.1.1 The proposal has a bulk and scale which is consistent with the neighbourhood character.
- 2.1.2 The request submitted by the applicant establishes that the proposal is consistent with the objectives of the development standard and the zone.
- 2.1.3 The variation requests to Floor Space Ratio submitted with the development application was found to provide adequate environmental planning grounds to justify the breach in the maximum floor space ratio.

2.2 Approve Development Application DA-2021/189/A for modify original proposal to include changes to conditions of consent wording, infill ground level approved under croft parking area to a new commercial suite, addition of osd tank and stairwell, convert landscaped area to two car spaces and associated works at 48 Chandos Street, St Leonards NSW 2065, subject to conditions contained in Attachment 8, for the following reasons:

- 2.2.1 The proposal is consistent with the objectives of the B3- Commercial Core Zone and considered to be generally consistent with the objectives of the *Willoughby DCP*.
- 2.2.2 The modification results in a better active street frontage design consistent with the desired character of the area.
- 2.2.3 The development provides significant social benefits that are aligned with the NSW Government and Willoughby Council's strategic objectives for the St Leonards area.
- 2.2.4 It is considered that the proposed modification meets the desired outcomes and objectives of the development standards contained in the *Willoughby Local Environmental Plan 2012 (WLEP)* and objectives of the *Willoughby Development Control Plan (WDCP)*.

3. BACKGROUND

The original development application (DA-2021/189) for partial demolition and adaptive reuse of existing building to provide shop top housing with affordable rental housing and associated works. The application was determined (after amendments to satisfy a deferred WLPP meeting) on 20 January 2022.

This modification has been lodged in conjunction with a similar modification on the neighbouring property, 52 Chandos Street, to 'enclose' the ROW that creates a tunnel and access through to Henry Lane. The proposed modification results in a much better active street frontage outcome on Chandos street, however the relationship with Henry Lane required further refinement through the assessment process. The original plans lodged with the modification sought two carparks off Henry Lane and removed the landscaped area, however this was not a desired outcome from a traffic and planning stance at Council and was amended to reintroduce landscaping. Theses amended plans being the plans subject to this WLPP determination.

4. DISCUSSION

The modification application proposes to Infill a previously approved undercroft, and 'right of way' at ground-level on the eastern side of the building for a new commercial space. The modification also includes:

- a. Change in design of the OSD tank and landscaped area towards Henry Lane in line with conditions
- b. New layout for the Henry Lane Level
- c. Roof and facade amendment to accommodate the additional commercial space. This includes the introduction of an awning along Chandos Street.
- d. Revised landscape plan
- e. Removal of all three commercial parking spaces

The proposed changes do not change any aspect of the residential component including the parking. Therefore, compliance with SEPP 65 does not change from what's approved in the parent consent.

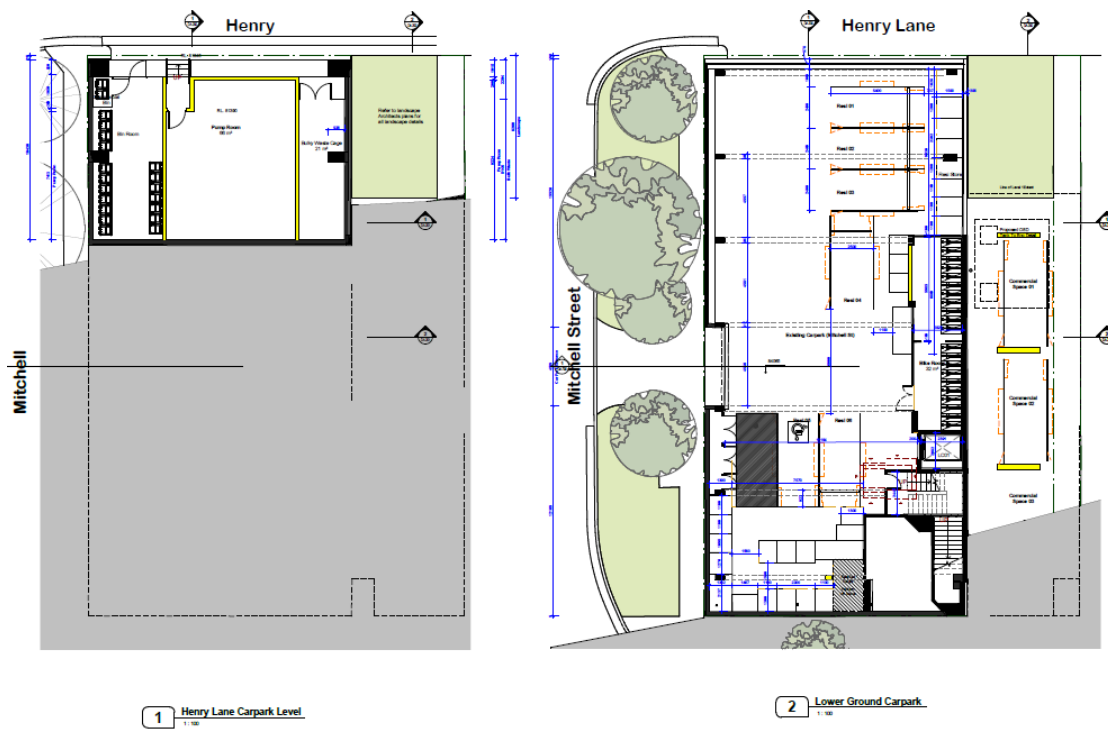


Figure 1: Approved Henry Lane and Lower ground levels

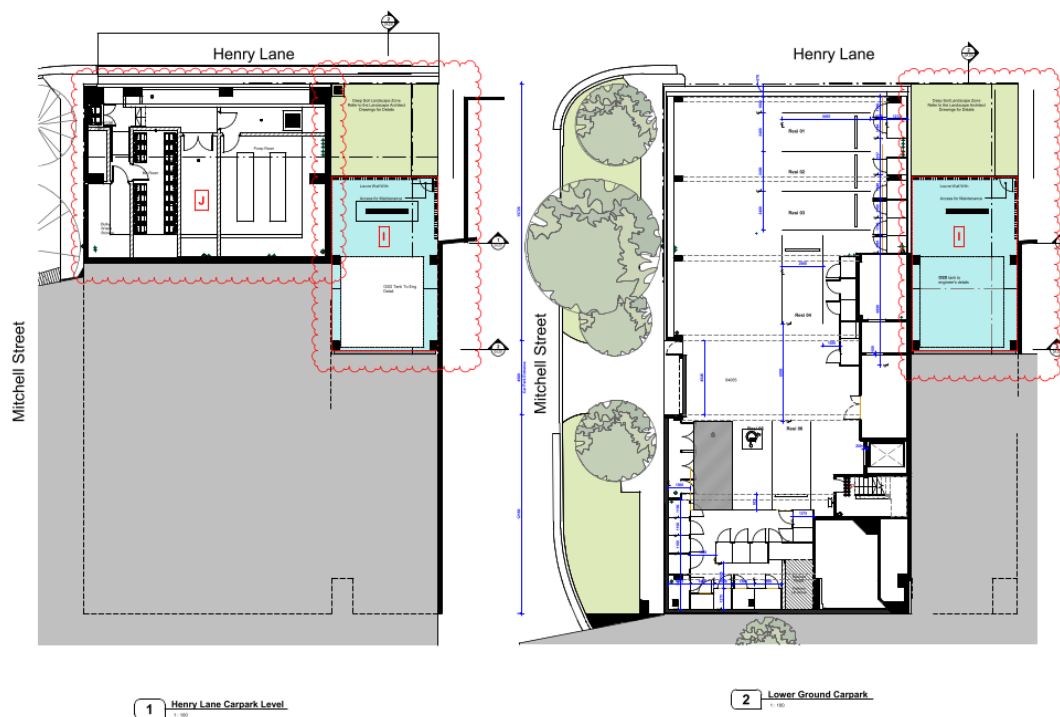


Figure 2: Proposed Henry Lane and Lower ground levels

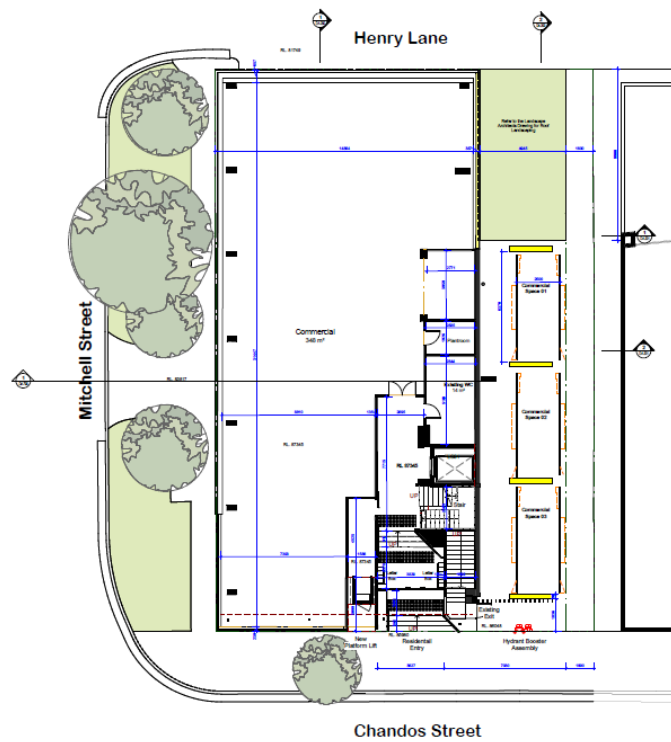


Figure 3: Approved Ground Floor level

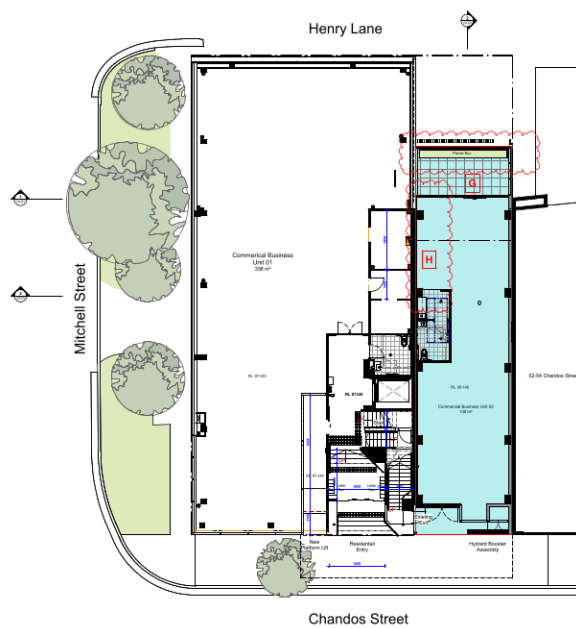


Figure 4: Proposed Ground Floor Level

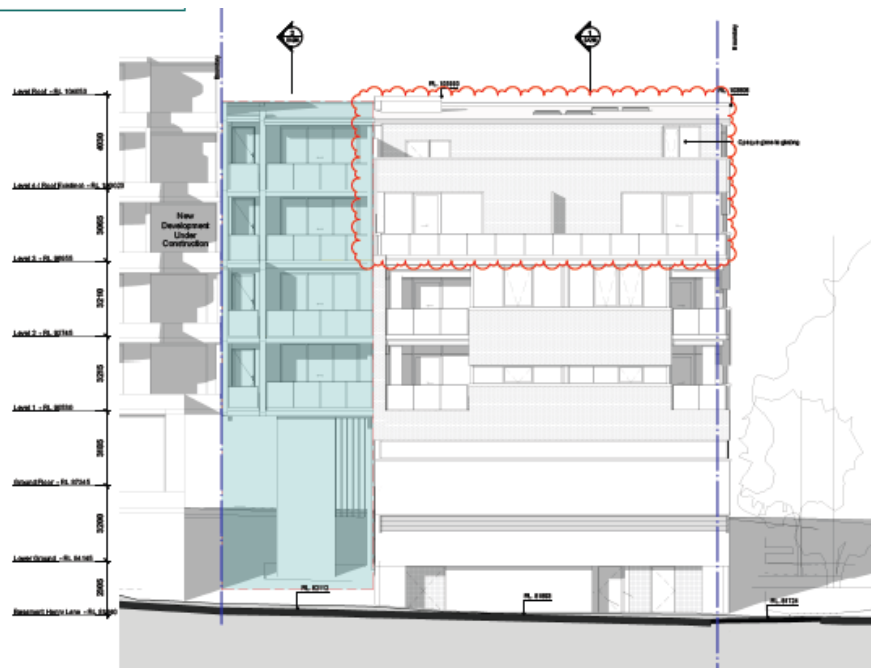


Figure 5: Approved North Elevation

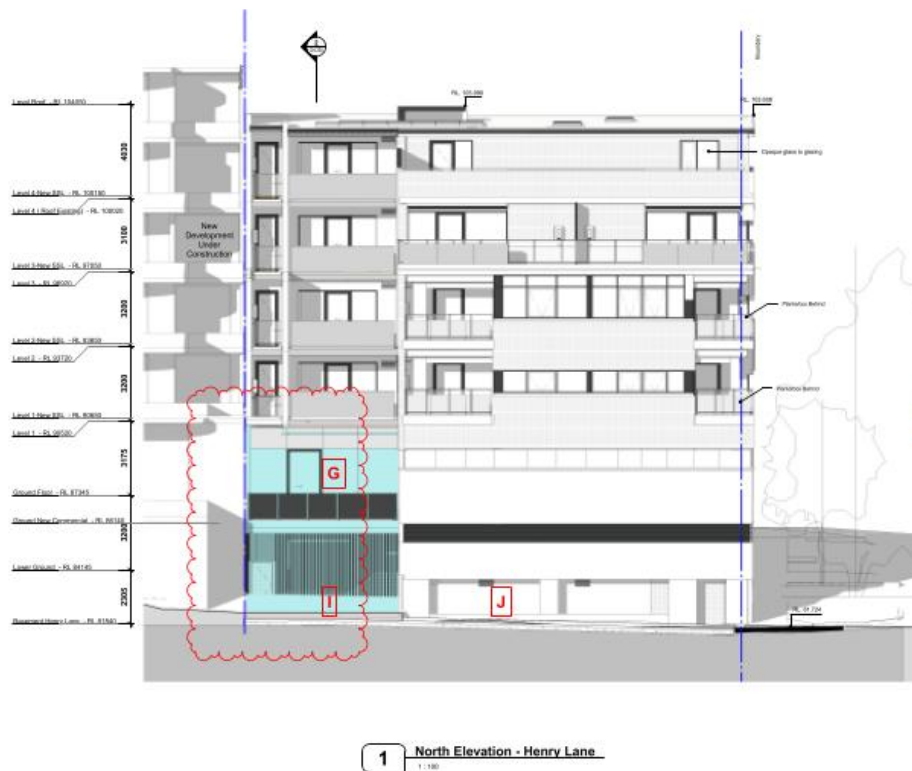


Figure 6: Proposed North Elevation

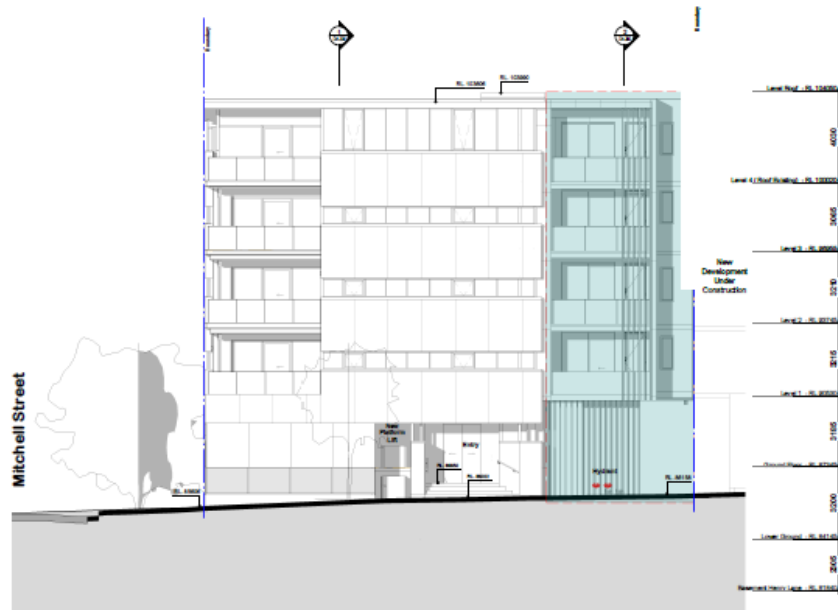


Figure 7: Approved South Elevation

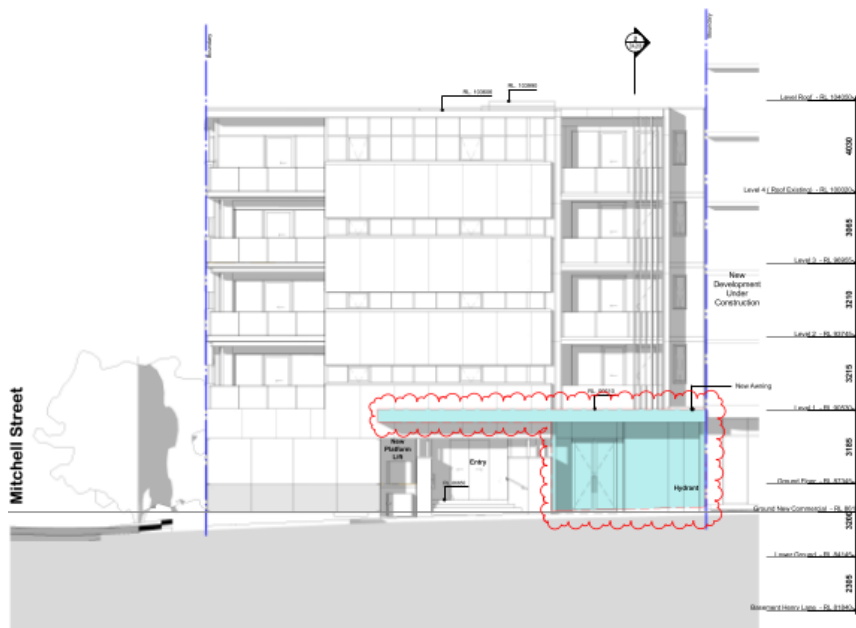


Figure 8: Proposed South Elevation

A description of the site and surrounding area, including an aerial photograph is contained in **Attachment 1**.

The controls and development statistics that apply to the subject land are provided in **Attachment 2**.

An assessment in accordance with the relevant controls in the *Willoughby Local Environmental Plan 2012 (WLEP)* is provided in **Attachment 3**.

An assessment in accordance with the relevant controls in the *Willoughby Development Control Plan (WDCP)* is provided in **Attachment 4**.

An assessment in accordance with S4.55 of the *Environmental Planning and Assessment Act* (EP&A Act) is provided in **Attachment 5**.

An assessment in accordance with S4.15 (79C) of the EP&A Act is provided in **Attachment 6**.

The issues within the submissions objecting to the proposal and the assessing officer's response are contained in **Attachment 7**.

The **WLPP plans** used for this assessment can be found under the DA tracking functionality for this application on Council's website:

<https://eplanning.willoughby.nsw.gov.au/pages/xs.track/SearchApplication.aspx?id=519141>

5. CONCLUSION

The modification application DA-2021/189/A has been assessed in accordance with Section 4.15 (79C) of the *Environmental Planning and Assessment Act 1979*, WLEP 2012, WDCP, and other relevant codes and policies. It is considered that the proposal is acceptable in the particular location, subject to the consent conditions included in **Attachment 8**.

ATTACHMENT 1: SITE DESCRIPTION AND AERIAL PHOTO

Existing Building and Site Context

The property known as 48 Chandos Street, legally described as Lot 1 DP 874559, is located on the northern side of Chandos street and is a regular shaped rectangle lot generally orientated on a North/south axis. The site is zoned B3- Commercial Core and is directly adjacent to the Naremburn Heritage Conservation Area to the north.

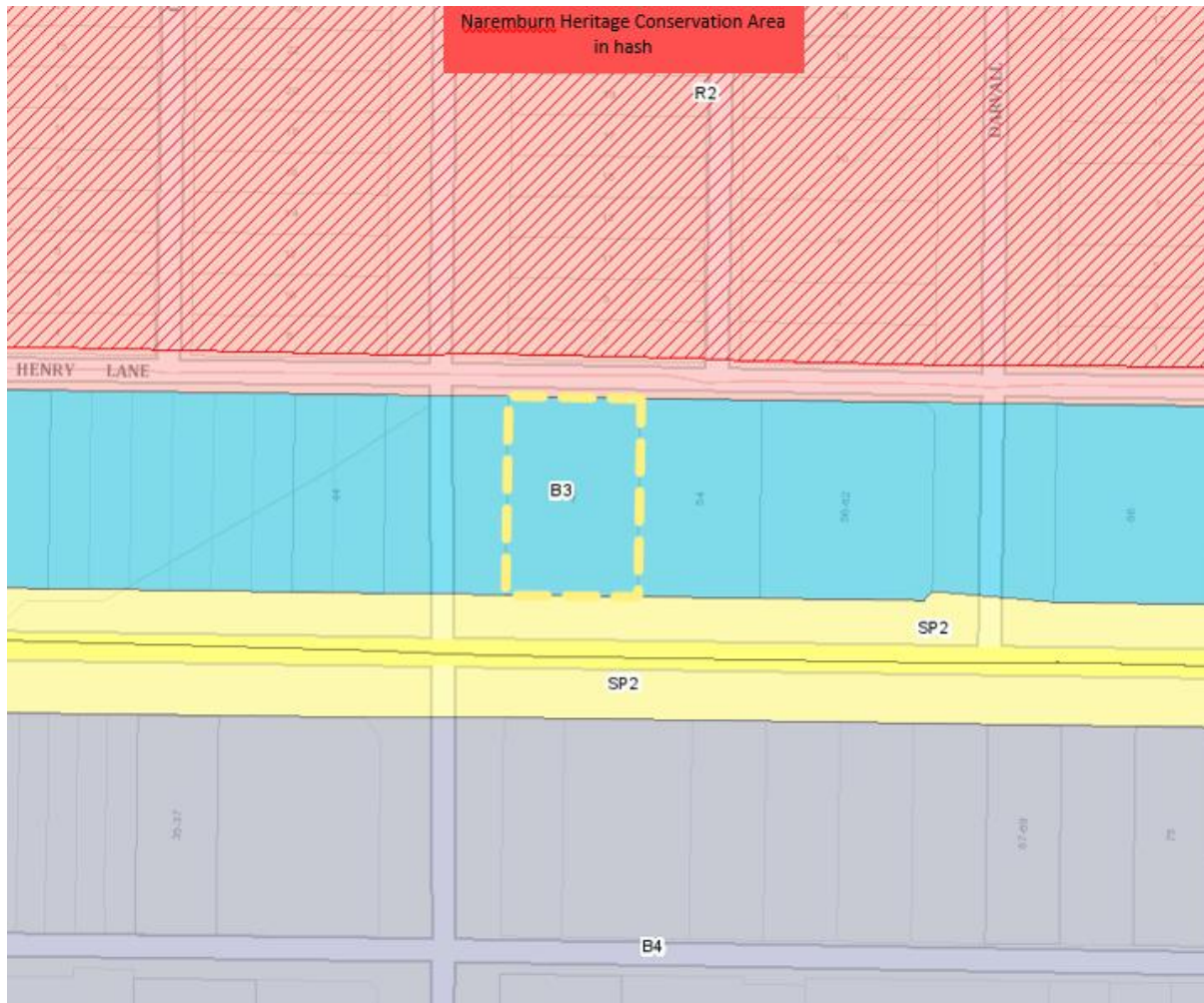


Figure 9: Zoning Map

The subject site is located on a corner lot with three street frontages, primary frontage being Chandos Street (21.7m), rear being Henry Lane (21.7m) and the side being Mitchell Street (32.46m). The site falls from its Chandos Street boundary to Henry Lane at the rear, a fall of roughly 4m.

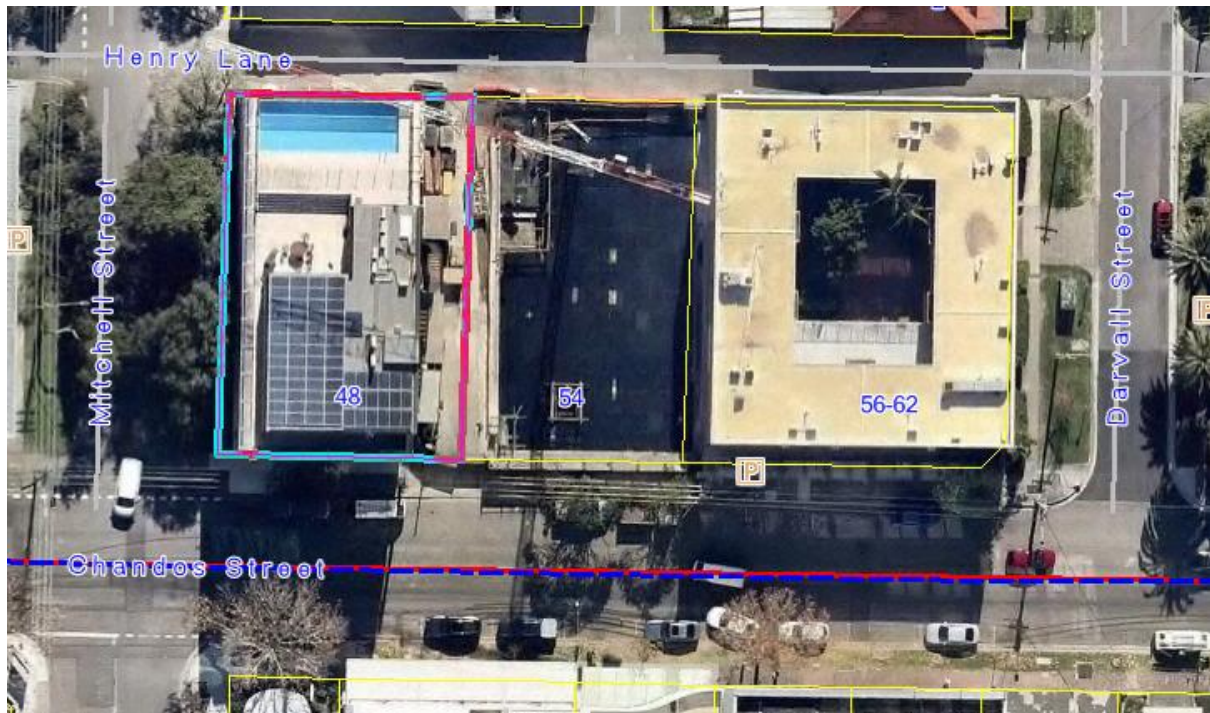


Figure 10: Aerial Image

The site currently contains an existing approved five storey commercial building with basement car parking and an under croft area on Henry Lane, built in the mid 1960's. The adjoining site (54 Chandos) is currently constructing a five storey shop top development, consistent with the character of mixed use development along 64-66, 72-76 and 78 Chandos Street. The southern side of Chandos Street is located within North Sydney Local Government Area and also contains shop top housing developments within a B4- Mixed Use zoning, however the building height and density are higher.



Figure 11: Photo from Chandos Street



Figure 12: Photo from Chandos street showing the frontage



Figure 13: Photo from Mitchell Street showing western elevation.



Figure 14: Photo from Mitchell Lane showing Henry Lane and the start of the Naremburn Conservation Area – R2 zone.



Figure 15: Render of Approved development

ATTACHMENT 2: CONTROLS & DEVELOPMENT STATISTICS AND REFERRALS

Willoughby Local Environmental Plan 2012 Zoning:	B3 – Commercial Core
Existing Use Rights	No
Additional Permitted Use	No
Conservation area	No
Aboriginal Heritage	No
Heritage Item	No
Vicinity of Heritage Item	Yes - Naremburn Heritage Conservation Area
Natural Heritage Register	No
Bushfire Prone Area	No
Foreshore Protection Area	No
Flood related planning control	No
Adjacent to classified road	No – Chandos Street is a Regional Road
Road/lane widening	No
BASIX SEPP	Yes
Infrastructure SEPP - Rail	No
Infrastructure SEPP – Road	No
Coastal Management SEPP	No
Acid Sulphate Soil Category	5
Development near Lane Cove Tunnel	No
Contaminated Land	No
Adjacent / above Metro	No
Other relevant SEPPS	Affordable Rental Housing
Other relevant REPS	Sydney Regional Environmental Plan (Sydney Regional Harbour catchment)
Relevant policies and resolutions	WDCP

Strategic Plans

Assessment of this application needs to be considered in conjunction with the strategic visions and strategic plans of Willoughby Council to ensure the development is consistent with the desired future outcomes of the St Leonards area. Below are the three applicable strategic documents endorsed by both the State and Council with simple commentary on the strategic vision where applicable.

Willoughby Local Strategic Planning Statement

Priority 2- Increasing the supply of affordable housing.

Willoughby's housing, in common with many parts of metropolitan Sydney, is increasingly expensive. Unchecked, all housing will become unaffordable for new families and for workers in relatively low paid but important jobs which are critical to the local economy, such as at the Royal North Shore Hospital, in the Artarmon and North Willoughby industrial areas and in the extensive retail and hospitality sector. Unaffordable housing also places people in rental and mortgage stress, creating risks for their future housing situation if their circumstances change or they are subject to social or economic shocks.

As part of this priority, Council have committed to advocating state government to invest in social and affordable housing to supplement the dwellings generated by the above contributions. In addition to advocating for supply, Council are ensuring where possible the

location of affordable housing is near facilities, services and existing frequent public transport.

Assessment Officers Comment:

The proposed development as approved meets all the 'Actions' outlined in this priority of the LSPS by delivering state funded affordable and social housing for a minimum of 25 years located near the key transport nodes of St Leonards St, Crows Nest Metro multiple bus nodes and access to adequate cycling infrastructure.

Priority 11- Supporting St Leonards to develop as a commercial and health and education precinct.

St Leonards is an important strategic centre in the Eastern Economic Corridor. It has benefitted from its proximity and accessibility to North Sydney and the Sydney CBD as well as Chatswood and Macquarie Park. Significant public and private development is planned in and near the Hospital including those parts south of the Pacific Highway and Chandos Street and near the new Metro station in Crows Nest, in the neighbouring LGAs.

Noting how attractive the area is and the predicted increase in development, the importance of accommodating for job intensification is required. Not only for the people employed by the developments, but also the number of people using these facilities is likely to increase in the future with population growth. This outlines the importance of nearby housing in commercial and residential areas which is affordable for key workers such as nurses in the future to support the operation of the health and education precinct.

Assessment Officers Comment:

Whilst this priority aims a solely affordable housing for workers, the benefit of locating affordable and social housing in the vicinity of these precincts is equally as important. This development is mainly aimed at domestic violence survivors and vulnerable women who would require the services either located or proposed within the RNSH precinct. In addition, this location opens up a wide net of employment easily accessed by public transport or walking if the tenants are moving from far locations.

The proposed increase in commercial floor space at ground adds further flexibility for the development and aligns with the state strategic direction in providing more jobs and supporting services in the area.

Willoughby Integrated Transport Strategy 2036

As part of the Willoughby integrated transport strategy community consultation St Leonards CBD was an area noted by the community has not having enough on-street car parking or that it is too expensive. This area is one of a number of areas of focus as part of this strategic plan to accommodate the growth and changes of the areas in the near future. Council note that given the commercial nature and proximity to public transport the parking in this area is high value but to simply provide more parking is not feasible. This plan explains that areas located to sufficient public transport options should discourage car trips for other travel. In conjunction with this general rule Council is also conducting more detailed studies to create a better management system for the current car parking.

Assessment Officers Comment:

Given the parking arrangements proposed, it is important to note this strategy before reading the below assessment. Whilst the *Willoughby DCP (WDCP)* does provide flexibility to reduce off-street parking in these key transport nodes, the 'general' variation to the control will see a significant shortfall. Strategically this is suitable given the proximity to multiple public transport opportunities and the desire to discourage car usage in the St Leonards CBD. In addition, this modification will reduce the commercial spaces to zero (forma required 2) which would be considered in line with the strategy in this key area.

St Leonards and Crows Nest Station Precinct: Interim Statement

The Precinct is identified as a Strategic Centre in the Greater Sydney Commission's (GSC) draft North District Plan. The importance of the Precinct as a key employment centre in Sydney combined with the new metro station at Crows Nest presents a unique opportunity for renewal and activation. The NSW Government is working to provide new homes and jobs located close to transport, open space and social infrastructure. The investigation will build on the GSC's vision for a 'health and education super precinct'.

The proposed development under assessment is located within the St Leonards Centre of this plan and is a key area of discussion in the interim statement which has outlined key objectives, opportunities and considerations for future development. Some of the main points to note in the St Leonards Centre are:

- Provide for the Social, Cultural and Civic needs of the community as the Precinct Grows.
- The Precinct will continue to foster the strong, established communities, whilst providing for new communities in a range of housing types reflecting different characteristics of the Precinct. Equitable housing will be provided for a diverse demographic.
- Mixed use development that takes advantage of existing and future transport.

Assessment Officers Comment:

Whilst this is a State level plan in its infancy, it is clear that the proposed development is consistent with the future desired character that the State has in mind. Noting heavy reliance on public transport, activating streets to create a pedestrian dominated area and endorsing development that benefits the social direction of this predicted 'health hub'.

Development Statistics		
Site Area (m ²)	707.5m ²	
Willoughby Local Environmental Plan 2012 (“WLEP 2012”)		
Zone Objectives: B3 – Commercial Core	<i>To provide a wide range of retail, business, office, entertainment, community and other suitable land uses that serve the needs of the local and wider community.</i>	Complies
	<i>To encourage appropriate employment opportunities in accessible locations.</i>	Complies
	<i>To maximise public transport patronage and encourage walking and cycling.</i>	Complies
	<i>To support the role of St Leonards as a specialised centre providing health, research and education facilities.</i>	Complies
	<i>To strengthen the role of Chatswood as a major centre for the inner north sub-region and to improve its public domain and pedestrian links.</i>	N/A
	<i>To protect and encourage safe and accessible city blocks by providing active land uses on street and pedestrian frontages.</i>	Complies
	Comment: The proposed modification is a permissible land use that seeks to service the much need social and affordable housing within North Sydney. The development maintains the ground level as a commercial space ensuring space for employment in the attractive St Leonard CBD. The development has been designed in a way that does not promote sole private car travel and provides large bicycle storage and emphasises the developments location to St Leonards Station, Crows Nest Metro and the surrounding bus network. In addition to the location to public transport, the location to public services such as RNSH is another positive ensure occupants of this building have access to health facilities and could potentially offer an affordable option for employees (subject to the criteria outlined by the applicant). The building itself will be adaptively reused and creates a much better outcome than the existing, with an Active street front along Chandos Street with active surveillance and consistency with surrounding new developments. It's considered that the proposed development is consistent with the objectives of the B3 zone.	
Permissibility	Schedule 1 – Additional Permitted Uses 48 Use of certain land at 14–102 Chandos Street, St Leonards (1) This clause applies to land at 14–102 Chandos Street, St Leonards, being land bounded by Henry Lane, Chandos Street, Christie Street and Ryan Lane.	

		(2) Development for the purpose of shop top housing is permitted with development consent.			
WLEP Control		Approved	Proposed	Standard	Compliance
CI 4.3	Height	20.447m	No change	20m	No change
CI 4.4 and CI 4.4A	Gross Floor Area	2,334m ²	2,470.6m ²	1,768.75m ²	No. See Attachment 3.
	FSR	3.3:1	3.49:1	2.5:1	
ARH SEPP	CI13- FSR			3:1	NA
CI 6.7	Active Street frontage	The street frontage contains windows, entrance to a lobby, fire exit/services and vehicular access via ROC to commercial parking.	The modification removes the ROW access and amends the fire services to create a better more active street frontage than what was originally approved.	A building has an active street frontage if all premises on the ground floor of the building facing the street are used for the purposes of business premises or retail premises.	Yes
Willoughby Development Control Plan (WDCP)					
WDCP		Approved	Proposed	Standard	Compliance
Part E – Commercial / Shop top Housing					
E.1.1	Frontage	18.02m	21.6m	27m for bldg>11m	Yes
E1.2	Use and Floor Space	Over 60% of the ground floor is to be for commercial use and is consistent with development along Chandos Street.	No change	No more than 30% of the street frontage is to be used for vehicular and pedestrian access to lower and upper levels. A minimum of 60% gross floor space at street level is to be used for retail or business premises.	Yes
	Building Height	Solar Access, Views and compatibility with the street frontage	No change	The height of the building must ensure that:	Yes

		remain consistent with the objectives of the control.		<p>– solar access to adjoining properties and key areas of the public domain is maintained;</p> <p>– views from neighbouring dwellings are not unduly compromised;</p> <p>And</p> <p>– the building height does not overwhelm the public street and is compatible with the existing or planned scale of surrounding developments.</p>	
E1.3	Façade treatment	The adaptive reuse with addition will significantly upgrade the facade treatment of the existing dwelling. The proposal will adjoin the neighbouring development at 54 Chandos respecting the ROC and creating an attractive and practical frontage given the site constraints.	<p>IN addition to the original facade upgrades, the proposed modification seeks to remove the ROW void and infill against 52 Chandos who are also proposing the same.</p> <p>The proposal is creates a more consistent architectural character for the area and is a more integrated design that increase the active street frontage.</p>	<p>Developments in areas of established streetscape with consistent stylistic or architectural character the design of new buildings should be integrated into and not be in contrast with the existing streetscape.</p> <p>Materials, colours, finishes, fenestration, proportion of building elements and scale of a new development should add interest to façades and should blend</p>	Yes

				with the existing shop fronts	
	Building massing and bulk	<p>The development proposes to utilise the existing building for an adaptive reuse, with the existing 'shell' retained. This results in a development without a podium.</p> <p>The proposal adds greater visual interest and amenity to pedestrian areas with the adaptive reuse and enhances the character of the existing commercial.</p>	Its considered the infill of the ROW void does not increase the overall bulk and scale of the development from what is approved under the parent consent.	<p>Buildings over 11m should have a defined podium and tower element.</p> <p>The podium should be defined as a transition element to reflect the height and form of neighbouring buildings. This can be achieved by setbacks or changes in façade treatment, materials and colours.</p>	Yes.
E1.4	Setbacks Front	<p>Nil to 1.6m. Given it is a corner site this applies to both Chandos and Mitchell Street.</p> <p>The adaptive reuse of the building will maintain mainly a Nil setback to Chandos and Mitchell (Noting the proposed new addition is setback to reflect the approved neighbouring development).</p>	No change from parent approval	<p>Level G to lvl 3 -0m/2m (dependent on streetscape)</p> <p>Lvl 4 and up - <u>5m</u> +1.2<u>m</u>/ total No.<u>storeys</u> above the third floor.</p>	Yes
	Side	Addition fully complies given it does not surpass 50% of the side boundary and is designed within the	The sloping site changes the ground floor as the site goes down, however the intent of the control is	<p>Ground Floor: Zero setback</p> <p>First and Second Floor: Zero setback for maximum of 50% of the</p>	Yes

		permissible balcony encroachment area.	achieved with the new infill matching/mirroring the neighbouring development setbacks for the ground floor commercial.	length of the side boundary. for the remainder of the building are to comply with the building envelope determined by a line projected horizontally at 300 from the side boundary from half way along the boundary towards the rear of the site. Third Floor and Above: 3m for the third floor of the building with an increase of 1.2m for each storey of the building above the third floor	
	<p>Rear Ground Floor:</p> <p>1st & 2nd Floors:</p> <p>3rd & 4th Floors:</p>	<p>Levels Ground, 1 & 2 maintain existing form (215mm setback) which does not progressively increase with height.</p> <p>Level 3 – 4.49m</p> <p>Level 4 – 4.49m to communal area and 12.54m to wall of studio.</p>	<p>No change to rear setback from parent approval.</p> <p>New commercial space will match the setbacks of the 'side addition' that was approved, being 9.5m.</p>	<p>Ground floor adjoining a public laneway: minimum 2m</p> <p>Upper Floors (all floors above ground floor): a minimum of 6 metres from the line of the ground floor rear wall below for the first floor, with an increase of 1.2m for the second level, 3m for the third level, 1.2m for the fourth level and 3m for the fifth level.</p>	Yes

E1.5	Building depth	No change to building depth but the design adequately achieves natural light and cross ventilation for an appropriate number of units in line with the ADG.	No change	Max 20m unless justified.	Yes
E1.6	Landscaping	Given the 200mm rear setback of the existing form a 3m buffer to the residential area cannot be achieved. Landscaping to the rear has been provided where possible to create a better amenity within the ROC area and used as permeable area for stormwater	Amendments to landscape area have been made. Simply the area is wider and short than the original approval.	A three metre wide landscaped setback area is to be provided along a rear boundary adjoining residentially zoned land as a buffer between the properties to maintain privacy and visual amenity of the residential land.	Consistent with parent approval.
	Private Open Space		No change	Studio, 1b & 2b - 10m ² 3b+ - 15m ² 2m width (min)	Yes
E.1.7	Communal Open Space	83m ²	No change from parent approval.	30m ² for the first 15 dwellings plus 10m ² per additional dwelling = 140m ²	Yes
E.1.10	Solar Access and Overshadowing	84.6% of units achieve at least 2 hours between 9am-3pm.	No change	ADG: Min. 2 hours to at least 70% of the units	Yes
E.1.11	Service Facilities and Amenities	Letter boxes and storage supplied.	No change		Yes

E1.12	Reflectivity	Conditions included to ensure hazardous or undesirable glare is avoided	No change from parent approval.	To avoid glare to adjoining buildings, passing motorist & pedestrians.	Yes
E.1.13	Awnings	No awning	Awning provided at 4m high consistent with the proposed at 52 Chandos. Awning is 600mm from the kerb.	height clearance above the footpath between 3m and 4.2m Setback 600mm from the kerb	Yes
WDCP		Approved	Proposed	Standard	Compliance
Part C – General Requirements					
C.4	Car spaces	6x residential parking spaces 3x Commercial spaces	6x residential parking spaces 0 x Commercial	<ul style="list-style-type: none"> - 0.5/Studio (4) - 1/ dwelling (18) Total: 22 spaces required 1 visitors space per 4 dwellings Total: 6 spaces required 1 space per 110m ² business premises (460m ²) – rounded down Total: 4 spaces required Loading Bay – commercial 1 Removalist truck parking - 1 Total = 34 Spaces	No. See Attachment 4.
C.6	Access/Mobility Adaptable car spaces	50% of units can be adaptable. 1x disabled space provided	No change	50% of units to be adaptable- 13 units 3x spaces/10-14 adaptable units	Yes

C.8	Waste Managemen t	Each floor contains bin and recycling rooms for the residents. The building managed cleaners will take the rubbish to the bin room off Henry lane.	No change	Bins for kerbside collection	Yes
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Referrals

Building services	No objection subject to conditions already imposed.
Engineering	<p>We have reviewed the amended plans. The modification to remove the proposed parking from Henry Lane is acceptable. We note that this modification has removed all commercial parking, which will need to be commented on by planners / traffic.</p> <p>The area of the detention tank looks to be enclosed. As overflow occurs from the top of the tank, an overflow path is required and any structure should not block the path. We propose amending Condition 9 to ensure that this path is shown on the plans.</p> <p>Amend Condition 9 as follows:</p> <p>9. Detailed Stormwater Management Plan (SWMP)</p> <p>Prior to the issue of the Construction Certificate, submit to the Certifier for approval, detailed stormwater management plans in relation to the on-site stormwater management and disposal system for the development. The construction drawings and specifications shall be prepared by a suitably qualified and experienced civil engineer and in accordance with JN Drawings C010/2, C050/2, C051/2, C052/2, C053/1, C100/2, C200/2, C210/2, C220/2, and C300/2. All drawings shall comply with Part C.5 of Council's Development Control Plan and Technical Standards, AS/NSZ3500.3 – <i>Plumbing and Drainage Code</i> and National Construction Code. The pipe system shall be designed to carry the flow from a 1%AEP storm event, unless overflows are able to be directed to the OSD tank. The PSD from the OSD tank is to be reduced by the 1%AEP flow from any bypass areas. A new stormwater pit is to be provided at the connection to the Council pipe in Henry Lane. The overflow from the OSD tank is to be to ground and directed to Henry Lane via an overland flow path. The flow path is to be shown on the plans and no obstructions placed along the flow route. All access to the tank is to be located in common areas. (Reason: Ensure compliance)</p>
Traffic	<p>No objection to the proposed modification, subject to increase of more bicycle facilities, such as, bike racks and installation of End-of-trip facility, to encourage active transport for the commercial suites.</p> <p>Assessing officer comments:</p> <p>The development has a large bike store in the lower ground carpark that can accommodate up to 20+ bikes and locker storage. Suitable for the single floor of commercial proposed. In addition, by the simple removal of all commercial car parking from the site, it forces occupants to consider other modes of transport given the already limited parking available in the St Leonards area.</p>

ATTACHMENT 3: ASSESSMENT UNDER WLEP

Extent of Variation – Clause 4.4 Floor Space Ratio and Clause 4.4A Exception to Floor Space Ratio

There is a non-compliance with the maximum floor space ratio (FSR) stipulated within Clause 4.4A Exceptions to Floor Space Ratio within the WLEP. The below table provides the proposed FSR:

Approved FSR	Proposed FSR	FSR Standard	Variation to Standard
3.3:1 (2,334m ²)	3.49:1 2,470.6m ²	2.5:1 (1,632.25m ²)	39.5%

Clause 4.6 Exceptions to development standards of WLEP 2012 Subclause (3) reads:

(3) Development consent must not be granted for development that contravenes a development standard unless the consent authority has considered a written request from the applicant that seeks to justify the contravention of the development standard by demonstrating:

(a) that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case, and

(b) that there are sufficient environmental planning grounds to justify contravening the development standard.

Whilst technically a clause 4.6 is not required, the applicant has provided reasoning within the SEE seeking further variation to the floor space ratio (FSR) development standard.

Key points of the applicant's submission:

- The proposed additional 137sqm of additional commercial floor space will better align the development with the zone objectives of the B3 Commercial Core zone, without creating additional burdens on the environmental capacity of the land. The single additional commercial suite will not significantly increase the intensity of the development as approved, and will continue to be less than the intensity of the previous use being a commercial building accommodating between 150-200 staff each day.
- The proposed development will deliver significant urban design, activation and safety benefits to the local streetscape and character by infilling these spaces for additional commercial floor space. From an urban design perspective, it will deliver a consistent and activated street wall, that leads to improved building design for both properties.
- The additional commercial floor space is modest and does not create any additional environmental impacts beyond the approved development. Rather, the additional floor space brings with it significant improvements to the development's overall design and the streetscape and character of Chandos Street;

Council has conducted an assessment of the proposed development and the written request to vary the development standard provided by the applicant. Whilst the applicant is not

legally required to lodge a clause 4.6 assessment for the amendment to the application, the assessing officer will use the objectives of the clause as a foundation for the assessment against the variation of Development Standard Floor Space Ratio. Assessment as follows;

4.6 (1) The objectives of this clause are as follows:

- (a) *to provide an appropriate degree of flexibility in applying certain development standards to particular development,*
- (b) *to achieve better outcomes for and from development by allowing flexibility in particular circumstances.*

CI 4.6 Criteria	Response
4.6(2) <i>Development consent may, subject to this clause, be granted for development even though the development would contravene a development standard imposed by this or any other environmental planning instrument. However, this clause does not apply to a development standard that is expressly excluded from the operation of this clause.</i>	The development standard is not expressly excluded from the operation of this clause.
4.6 (3) <i>Development consent must not be granted for development that contravenes a development standard unless the consent authority has considered a written request from the applicant that seeks to justify the contravention of the development standard by demonstrating—</i>	
a) <i>Has the applicant's submission demonstrated that compliance with the standard is unreasonable or unnecessary in the circumstances of the case, and</i>	<p>The applicant's written request has demonstrated that the objectives of the development standard are achieved, notwithstanding the non-compliance with the development standard</p> <p>In doing so, the applicant's written request in conjunction with the parent approval has adequately demonstrated that the compliance with the development standard is unreasonable and unnecessary in the circumstances of this case.</p>
b) <i>Has the applicant's submission demonstrated that there are sufficient environmental planning grounds to justify the non-compliance?</i>	The applicant's written request in conjunction with the parent approval has adequately demonstrated that there are sufficient environmental planning grounds to justify contravening the development standard.
4.6(4) <i>Development consent must not be granted for development that contravenes a development standard unless:</i>	
a) i) <i>Has the applicant's written request adequately addressed the matters required to be demonstrated in subclause 3</i>	The applicant's written request in conjunction with the parent approval has adequately demonstrated that compliance with the standard is unreasonable or unnecessary in the circumstances of the case, and that there are sufficient environmental planning grounds to justify the non-compliance
ii) <i>Is the proposed development in the public interest because it is consistent with:</i>	
• <i>objectives of the particular development</i>	Yes, see assessment below

<i>standard</i>	
<ul style="list-style-type: none"> <i>objectives for the development within the zone in which the development is proposed to be carried</i> 	Yes, see assessment below

Consistency with the objectives of the Floor Space Ratio development standard:

Consistency of the proposed development with the floor space ratio standard's objectives is discussed below:

Floor Space Ratio Development Standard Objectives	Response
a) <i>to limit the intensity of development to which the controls apply so that it will be carried out in accordance with the environmental capacity of the land and the zone objectives for the land</i>	The modification does not unreasonably increase the overall intensity of the shop-top development and will operate within the environmental capacity of the land and zone objectives as approved under the parent application. The minor addition to floor space on the ground floor still remains a positive outcome for the site.
b) <i>to limit traffic generation as a result of that development,</i>	As above, there is no change to the intensity of the residential use. The small increase in commercial space is unlikely to impact traffic generation as determined in the parent approval. Additionally, deleting the three commercial spaces reduces the traffic to the site naturally.
c) <i>to minimise the impacts of new development on adjoining or nearby properties from disruption of views, loss of privacy, overshadowing or visual intrusion,</i>	The development results in no change to overshadowing, view intrusion and privacy from the parent consent.
d) <i>to manage the bulk and scale of that development to suit the land use purpose and objectives of the zone,</i>	It's considered that the modification does not unreasonably increase the overall bulk and scale when viewed from the streetscape or adjoining properties. Additionally, the minor increase to the ground floor commercial space is not considered to increase/impact the overall bulk and scale of the development as approved by the parent consent.
e) <i>to permit higher density development at transport nodal points,</i>	No change from parent assessment.
f) <i>to allow growth for a mix of retail, business and commercial purposes consistent with Chatswood's sub-regional retail and business service, employment, entertainment and cultural roles while conserving the compactness of the city centre of Chatswood,</i>	N/A
g) <i>to reinforce the primary character and land use of the city centre of Chatswood</i>	N/A

<i>with the area west of the North Shore Rail Line, being the commercial office core of Chatswood, and the area east of the North Shore Rail Line, being the retail shopping core of Chatswood,</i>	
<i>h) to provide functional and accessible open spaces with good sunlight access during key usage times and provide for passive and active enjoyment by workers, residents and visitors to the city centre of Chatswood,</i>	N/A
<i>i) to achieve transitions in building scale and density from the higher intensity business and retail centres to surrounding residential areas,</i>	The proposed modification ensures the transition to the northern residential is maintained and consistent with the neighbouring development at 52 Chandos Street.
<i>j) to encourage the consolidation of certain land for redevelopment,</i>	N/A
<i>k) to encourage the provision of community facilities and affordable housing and the conservation of heritage items by permitting additional gross floor area for these land uses.</i>	The proposed modification does not change the approved 26 social and affordable housing dwellings for 25 years in a contractual arrangement with the NSW Government.

Consistency with the objectives of the B3 – Commercial Core Zone:

Consistency of the proposed development with the Zone's objectives is discussed below:

Zone Objective	Response
<i>To provide a wide range of retail, business, office, entertainment, community and other suitable land uses that serve the needs of the local and wider community.</i>	The development provides a highly adaptable commercial/business space at ground level with apartments above to service the residential needs of those seeking close proximity to the services and transport options of St Leonards. The modification seeks to improve the ground floor adaptability.
<i>To encourage appropriate employment opportunities in accessible locations</i>	The development provides a 468m ² commercial/business tenancy that is located within 350m of St Leonards station and within a walkable distance to other stations/major centres like Crows Nest (including metro).
<i>To maximise public transport patronage and encourage walking and cycling.</i>	The development has proposed reduced car rates to utilise the WDCP flexibility and Willoughby's/NSW's strategic visions to promote alternate forms of transport and to reduce car dependency in the St Leonards area. This development is located near a number of key transport nodes which is a unique opportunity for an affordable housing development. The proposed modification removes the 3 commercial spaces to have no commercial spaces which is considered appropriate in this instance given the social benefit of the development maximising affordable housing

	and adaptively reusing the structure whilst creating a suitable active street frontage outcome.
<i>To support the role of St Leonards as a specialised centre providing health, research and education facilities.</i>	The proposed development remains consistent with character control E.2 of the WDCP 2016, is consistent with the desired character of Chandos Street and does not limit the role of St Leonards as a specialised centre providing health, research and education facilities. The development is considered to complement the main role of the area and is consistent with Council's strategic vision.
<i>To strengthen the role of Chatswood as a major centre for the inner north sub-region and to improve its public domain and pedestrian links.</i>	N/A
<i>To protect and encourage safe and accessible city blocks by providing active land uses on street and pedestrian frontages.</i>	The development as modified proposes a more suitable design on the ground level providing a more desirable active street frontage design. The modified design cements a safe, accessible and properly active shop design for Chandos Street.

Consideration of the variation to the standard

Based on the above considerations, the proposed increased variation to the approved development standard is acceptable. The applicant's modification justification is considered to have demonstrated that the objectives of the development standard are maintained, notwithstanding the noncompliance with the development standard. In doing so, the applicant's justification has adequately demonstrated the compliance with the development standard is consistent with the parent approval and is therefore unreasonable or unnecessary in the circumstances of the case and that there are sufficient environmental planning grounds to justify contravening the development standard.

Variation of the standard is considered to be in the interests of the public given that the relevant objectives of the zone and standard are met by the proposal despite its numerical non-compliance with the development standard. The variation is not considered to raise any matter of regional and state significance, and concurrence of the Minister in approving this variation can be assumed by the WLPP.

ATTACHMENT 4: ASSESSMENT UNDER WDCP

C.4. – Car Parking

The applicant has provided justification to remove the 3 commercial parking spaces approved under the parent consent which were located in the ROW area. The applicant has requested a flexible approach to parking numbers due to the close proximity to a number of alternative transport types including St Leonards Station, Crows Nest Metro, St Leonards bus routes, Crows Nest bus interchange and an evolving cycle network. All located within a 600m walk as shown on the image below.



Figure 17: Star shows the subject location in proximity to major transport nodes.

In addition to the flexibility provided by the DCP, the strategic direction of Council's Local Strategic Planning Statement notes the importance of the St Leonards CBD transition to a pedestrian focused area that discourages private car use and reduces traffic. Furthermore, the applicant argues the small scale of approved commercial parking provides minimal positive impact to traffic management of the one level of commercial and warrants complete removal inline with strategic directions to rely on other modes of transport. Reaffirming that the residential parking does not change.

The parent approval endorsed 6 residential and 3 commercial parks (with two of these to be ride share services eg. GoGet, PopCar) and the planning panel agreed that this reduction in parking was in line with the vision of the St Leonards CBD area and that it is important to reduce the amount of parking to reduce vehicle traffic and car dependency. This and plus the large social benefit of the development were merits for the approval.

Council have reviewed the further removal of the three commercial spaces and agree with the applicant. Given the residential spaces remain unchanged, the spaces serviced only one level of commercial, are located in the St Leonards area, and is in conjunction with an 100% affordable housing project that will provide large social benefit; the removal of the three spaces is considered appropriate and in line with strategic directions by both Council and the NSW State.

ATTACHMENT 5: SECTION 4.55 ASSESSMENT

Considerations Under S4.55(2) EP&A Act - Other modifications

A consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the regulations, modify the consent if:

Satisfactory ✓ Unsatisfactory ✗ Not Relevant N/A

(a)	It is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which consent was originally granted and before that consent as originally granted was modified (if at all).	✓
	Comment: Assessment below.	
(b)	It has consulted with the relevant Minister, public authority or approval body (within the meaning of Division 5) in respect of a condition imposed as a requirement of a concurrence to the consent or in accordance with the general terms of an approval proposed to be granted by the approval body and that Minister, authority or body has not, within 21 days after being consulted, objected to the modification of that consent.	✓
	Comment: N/A	
(c)	It has notified the application in accordance with: the regulations, if the regulations so require, or a development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for modification of a development consent.	✓
	Comment: The modified application was notified in accordance with Part D and E of Willoughby Community Participation Plan (WCPP) from 20 May 2022 to 10 Jun 2022. Council received 11 submissions and is addressed in Attachment 7 of this report.	
(d)	It has considered any submissions made concerning the proposed modification within the period prescribed by the regulations or provided by the development control plan, as the case may be.	✓
	Comment: Council received 11 submissions and is addressed in Attachment 7 of this report.	

ATTACHMENT 6 - SECTION 4.15 (79C) ASSESSMENT

The application has been assessed under the provisions of S.4.15 (79C) of the *Environmental Planning and Assessment Act*.

The most relevant matters for consideration are assessed under the following headings:

Matters for Consideration Under S.4.15 (79C) EP&A Act

Considered and Satisfactory ✓ and Not Relevant N/A

(a)(i)	The provisions of any environmental planning instrument (EPI)	
	<ul style="list-style-type: none"> State Environmental Planning Policies (SEPP) 	✓
	<ul style="list-style-type: none"> Regional Environmental Plans (REP) 	✓
	<ul style="list-style-type: none"> Local Environmental Plans (LEP) 	✓
	Comment: The further breach to FSR is considered to be satisfactory for the reasons set out in this report.	
(a)(ii)	The provision of any draft environmental planning instrument (EPI)	
	<ul style="list-style-type: none"> Draft State Environmental Planning Policies (SEPP) 	N/A
	<ul style="list-style-type: none"> Draft Regional Environmental Plans (REP) 	N/A
	<ul style="list-style-type: none"> Draft Local Environmental Plans (LEP) 	N/A
	Comment: There are no draft SEPPs that apply to the subject land. The draft WLEP and WDCP have been considered but have no impact on this assessment.	
(a)(iii)	Any development control plans	
	<ul style="list-style-type: none"> Development control plans (DCPs) 	✓
	Comment: The development maintains compliance with the objectives of the controls as assessed in the parent consent. Once again, this development for affordable housing in the key area of Chandos is suitable for endorsement of approval for the reasons in this report.	
(a)(iv)	Any matters prescribed by the regulations	
	<ul style="list-style-type: none"> Clause 92 EP&A Regulation-Demolition 	✓
	<ul style="list-style-type: none"> Clause 93 EP&A Regulation-Fire Safety Considerations 	✓
	<ul style="list-style-type: none"> Clause 94 EP&A Regulation-Fire Upgrade of Existing Buildings 	✓
	Comment: Matters reviewed by Council and appropriate conditions included within the consent.	
(b)	The likely impacts of the development	
	<ul style="list-style-type: none"> Context & setting 	✓
	<ul style="list-style-type: none"> Access, transport & traffic, parking 	✓
	Comment: The development seeks to utilise the close proximity to major transport nodes to support the reduce parking rate for the development. As the report shows, Councils controls and strategic vision allow for this provision especially in the St Leonards CBD and with Affordable housing. As shown in the submissions, current on street parking is difficult as the commercial and residential areas compete, however the overall strategic direction is to promote active and public transport options in this area and move away from private car dependency. To do so parking rates are reduced and Council as part of its strategic direction are researching more efficient way to manage the on street parking in the St Leonards CBD. Its considered the development has an appropriate impact satisfactory for approval.	
	<ul style="list-style-type: none"> Servicing, loading/unloading 	✓
	<ul style="list-style-type: none"> Public domain 	✓
	<ul style="list-style-type: none"> Utilities 	✓

Matters for Consideration Under S.4.15 (79C) EP&A Act
Considered and Satisfactory ✓ and Not Relevant N/A

	• Heritage	✓
	• Privacy	✓
	• Views	✓
	• Solar Access	✓
	• Water and draining	✓
	• Soils	✓
	• Air & microclimate	✓
	• Flora & fauna	✓
	• Waste	✓
	• Energy	✓
	• Noise & vibration	✓
	• Natural hazards: Overland flowpath	✓
	• Safety, security crime prevention	✓
	• Social impact in the locality	✓
	• Economic impact in the locality	✓
	• Site design and internal design	✓
	• Construction	✓
	• Cumulative impacts	✓
	Comment: The impacts of the proposal on adjoining or nearby properties are considered to be reasonable.	
(c)	The suitability of the site for the development	
	• Does the proposal fit in the locality?	✓
	• Are the site attributes conducive to this development?	✓
	Comment: The proposal generally fits into the locality noting the transition to the R2 zone is not fully compliant. However, the overall suitability of the site and the site attributes for the proposed affordable housing shop top development confirm compliance with this provision and is consistent with the parent approval.	
(d)	Any submissions made in accordance with this Act or the regulations	
	• Public submissions	✓
	• Submissions from public authorities	✓
	Comment: 11 Submissions were received and addressed within the report.	
(e)	The public interest	
	• Federal, State and Local Government interests and Community interests	✓
	Comment: The proposal is consistent with Strategic direction of both the State and Willoughby Council. In addition, the development will not ultimately compromise the character of the area and is in the general public interest to provide suitable affordable housing that creates a positive impact to the streetscape of the area.	

ATTACHMENT 7 – SUBMISSIONS TABLE

Council was in receipt of Eleven (11) individual submissions from the following objectors:

	G Taylor
	G Sheldon
	C St Clair
	H Pearson
	B Young
	A Waddington
	G & L Geor
	P Smyth
	K Mang
	R Promnitz
	Naremburn Progress Association

The below table provides the issues raised by the objectors and Council's response.

Issues Raised	Officer's Response
Removal of Landscape area	
"Landscaped area being removed... is clear over development".	The plans have been amended to ensure the landscaping along Henry Lane is maintained. There is a small amendment to the original design, with the area being wider rather than longer in the original, however the same area is proposed.
"Any development needs to retain green landscaped area... to help combat urban... [Heat island].	
"Sacrificing landscaping for car parking is a very poor proposition..."	
"DA189A requests removal of the 3 interior parking spaces and ... removal of the green space on the north east corner of the site. This is not acceptable to the community." 45r	
"[Removal of landscaping] This should not be allowed."	
"The removal of the environmental planning grounds green space certainly could not be seen as being in the interest of the proponent's intended resident cohort for which Planning approval was granted. Neither could such removal be seen to be in the general public interest."	This will also adjoin the additional landscaping proposed by 52 Chandos in the similar location.
Basement ceiling height	
"The ceiling height of the basement is now 1.7m to 1.8m which is not a habitable height and as an additional commercial area would increase the commercial FSR.	Basement has a head height of roughly 2m and is consistent with the original approval.
Additional Commercial	
"We don't understand why a new commercial building is necessary in Chandos Street where, currently, there at least four empty ground floor premises. The NSW Government's aim is to reduce effects on	A further request to increase FSR was assessed as part of this report and the planning merits are justified in Attachment 3.

climate through the design of buildings and their surroundings so, surely a more popular solution would be to create a small linear park at this location. This area of St Leonards has very little green space.”	
“What is even more galling is that the FSR increase is for additional commercial space, it has no public benefit, and does meet any of the extraordinary conditions that were used to get approval in the original DA such as “Community/Low Cost Housing” .”	
Noise	
“Will they [Air conditioner, pump room and commercial space balcony] generate noise that is directed towards the NCA?”	Conditions have been imposed for mechanical plant noise and where assessed as part of the original application. As for the commercial balcony, it is controlled by offensive noise legislation. Any change from commercial is subject to further approval.

ATTACHMENT 8: SCHEDULE OF CONDITIONS

SCHEDULE

Development Consent DA-2021/189 is modified as follows:

A. Condition No. 1 is amended to read as follows:

1. Approved Plan/Details

The development must be in accordance with the following consent plans electronically stamped by Council:

Type	Plan No.	Revision/ Issue No	Plan Date (as Amended)	Prepared by
Cover Page	DA.000 E	E	15/12/2021	Nordon Jargo Architects
Demolition Plan	DA.030 C	C	25/11/2021	
Demolition Plan	DA.031 C	C		
Demolition Plan	DA.032 D	D	15/12/2021	
Demolition Elevations	DA.033 E	E		
Basement and Lower Ground Floor Plans	DA.090 F	F	25/11/2021	
Proposed Ground Floor Plan	DA.100 F	F		
Proposed Levels 1 and 2 Plans	DA.101F	F		
Proposed levels 3 and 4 Plans	DA.102 G	G	15/12/2021	
Proposed Roof Plan	DA.190 F	F		
Proposed Section	DA.200 G	G		
Proposed Section	DA.201 F	F		
Proposed Elevations	DA.300 G	G		
Proposed Elevations	DA.301 G	G		
Finishes	DA.900 F	F		
Finishes	DA.901 E	E		
Landscape Plan	01-05	B	13/10/2021	TaylorBrammer

the application form and any other supporting documentation submitted as part of the application,

As modified by (DA-2021/189/A)

Plan Type	Plan No.	Revision/ Issue No.	Plan Date (as Amended)	Prepared by
Basement and Lower Ground Floor Plans	DA.090 I	I	10/11/2022	Nordon Jago Architects
Proposed Ground Floor Plan	DA.100 I	I		
Proposed Levels 1 and 2 Plans	DA.101 H	H	27/04/2022	
Proposed levels 3 and 4 Plans	DA.102 H	H	22/03/2022	
Proposed Roof Plan	DA.190 I	I	21/02/2023	
Proposed Section	DA.200 J	J		
Proposed Section	DA.201 I	I	10/11/2022	
Proposed Elevations	DA.300 J	J		
Proposed Elevations	DA.301 I	I		
Finishes	DA.900 H	H	27/04/2022	
Finishes	DA.901 F	F		
Landscape Plan	01-05	D	22/11/2022	TaylorBrammer

the application form and any other supporting documentation submitted as part of the application, except for:

- (a) any modifications which are “Exempt Development” as defined under S.4.1(1) of the *Environmental Planning and Assessment Act 1979*;
- (b) otherwise provided by the conditions of this consent.
(Reason: Information and ensure compliance)

B. Amend Condition 9 as follows:

21A. Detailed Stormwater Management Plan (SWMP)

Prior to the issue of the Construction Certificate, submit to the Certifier for approval, detailed stormwater management plans in relation to the on-site stormwater management and disposal system for the development. The construction drawings and specifications shall be prepared by a suitably qualified and experienced civil engineer and in accordance JN Drawings C010/2, C050/2, C051/2, C052/2, C053/1, C100/2, C200/2, C210/2, C220/2, and C300/2. All drawings shall comply with Part C.5 of Council’s Development Control Plan and Technical Standards, AS/NSZ3500.3 – Plumbing and Drainage Code and National Construction Code. The pipe system shall be designed to carry the flow from a 1%AEP storm event, unless overflows are able to be directed to the OSD tank. The PSD from the OSD tank is to be reduced by the 1%AEP flow from any bypass areas. A new stormwater pit is to be provided at the connection to the Council pipe in Henry Lane. The overflow from the OSD tank is to be to ground and directed to Henry Lane via an overland flow path. The flow path is to be shown on the plans and no obstructions placed along the flow route. All access to the tank is to be located in common areas.
(Reason: Ensure compliance)

C. The following condition is added:

PRIOR TO ISSUE OF CONSTRUCTION CERTIFICATE

4A. Extinguish Right Of Way

Prior to issue of the relevant Construction Certificate, the Right Of Way (ROW) over the subject property is to be fully extinguished. Evidence of formal removal is to be provided to the relevant PCA.
(Reason: Compliance)

D. Comply with all other conditions of the original development consent.

ATTACHMENT 9: NOTIFICATION MAP



Record of Neighbour Notifications sent relating to:

DA: 2021/189/A

At: 48 Chandos Street, ST LEONARDS NSW 2065

