Attachment C

Clause 4.6 Variation Request - Height of Buildings



Revised Clause 4.6 Variation Request

82 Wentworth Park Road, Glebe

Prepared on behalf of: NSW Land and Housing Corporation

November 10, 2023



Document control

Authors

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Project summary

Applicant	NSW Land and Housing Corporation				
Applicant's address	4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150				
Land to be developed	2 Wentworth Park Road, Glebe				
Legal description	Lot 1-4 DP82924				
Project description	Development of a four-storey residential flat building comprising 43 affordable housing dwellings				



Contents

Dod	cument control	ii
Exe	ecutive Summary	v
1	Introduction	8
2	Site location and context	11
2.1	The site	11
3	The proposal	12
3.1	Yield and dwelling mix	12
3.2	Built form and design	12
4	Extent of variation to development standard	14
5	Justification of variation	17
5.1	Consideration of Clause 4.6 requirements	17
5.2	Consideration of the 'five part test'	19
6	Conclusion	21
Арр	pendix A Cross sections	22
Tab	ble 1: Consideration of Clause 4.3 Height of Buildings objectives	18
Tab	ble 2: Consideration of objectives of the R1 General Residential zone	19
Tab	ble 3: Consideration of 'five part test'	19
Figu	gure 1: Maximum floor space ratio	9
_	; ure 2: Maximum height of buildings	
_	rure 3: Subject site	
_	gure 4: View from Wentworth Park Road	
_	gure 5: View from the north of the site on Bellevue Street	
_	gure 6: North Elevation (Wentworth Park Road)	
HIGU		
_	rure 7: Extent of variation – cross section	13
Figu	·	13 15



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Executive Summary

This report has been prepared to request a variation to a development standard subject to Clause 4.6 of the *Sydney Local Environmental Plan 2012* (Sydney LEP) in connection with a development application for a residential flat building for the purpose of affordable housing (to be managed as 100% social housing by NSW LAHC) at 82 Wentworth Park Road, Glebe.

The site is currently zoned R1 General Residential under the Sydney LEP and the following built form controls apply:

- FSR of 1.75:1
- Maximum height of 12m

The State Environmental Planning Policy (Housing) 2021 (Housing SEPP) provides for an additional 0.5:1 FSR for providing more than 20% affordable housing as part of a development. This allows the development to exceed the mapped FSR control of 1.75:1 for the site in Sydney LEP. The proposal has an allowable FSR of 2.25:1 under the Sydney LEP and Housing SEPP. The revised proposal is compliant with an FSR of 1.85:1.

The proposal will facilitate the provision of 43 affordable housing dwellings on the site. The proposal exceeds the maximum building height due to design measures to accommodate the bonus floor space provided by the Housing SEPP, to facilitate increased affordable housing on the site, and to accommodate the 1% AEP flood level requirements for the site. A very minor height exceedance is also required to accommodate the lift over run.

The proposed floorspace is below the maximum allowable FSR available. The proposed floorspace is appropriately accommodated on the site through a minor variation to height, rather than accommodating the additional floorspace within the 12m height limit which would result in increased bulk, scale, and amenity impacts.

The building height non-compliance is also required to accommodate the lift overrun and required flood planning levels along Wentworth Park Road which is subject to the 1% AEP flood event. The level established to comply with flood level requirements is the 1% AEP level at the site of RL2.77 +0.5m. This is a level of RL3.27, which ranges from 0.6 to 1m above ground level across the site. The need for additional height to accommodate the required flood planning levels was acknowledged by Council in the pre-DA advice (dated 30 March 2021).

In response to a Request for Information (RFI) received in June 2023, the proposal was revised to include clerestory skylights to improve solar access and cross ventilation to upper-level units. To accommodate the recommended clerestory skylights a minor variation to the height control is required. The extent of variation is minor and limited to 3% of the total roof area. The revised proposal will deliver better outcomes, including improved amenity outcomes, and does not result in any significant impacts to surrounding properties.

As part of the revised plans provided in response to the RFI in June 2023, the need for a minor increase to the lift overrun was also identified. The minor increase is required to provide sufficient allowance for the lift overrun. The minor exceedance for the lift overrun is no greater than 1.35m (noting a minor increase of 200mm was identified as part of the RFI response in June 2023 which resulted in an increase from RL 16.22 in the exhibited proposal to RL 16.42 in the revised proposal). The minor increase does not result in any impacts.

The proposal has been further revised in response to an RFI received in October 2023, to provide a 2m setback between the building and the existing retaining wall on Bellevue Street. The revised proposal



includes minor changes to the building and apartment layout but does not result in any change to the proposed building height and results in a minor reduction to the proposed FSR (a reduction from 1.93:1 to 1.85:1 in the revised proposal).

The proposal provides significant public benefit in the form of new and increased affordable housing. Despite the non-compliance, the proposed development does not result in any unreasonable amenity impacts to adjoining properties, heritage conservation area, or public domain.

The proposal is consistent with the objectives of Clause 4.3 'Height of Buildings', and the zone objectives of the R1 General Residential zone in the Sydney LEP. As such compliance is considered unnecessary or unreasonable in the circumstances and there are sufficient environmental planning grounds to justify the departure from the height control.

Clause 4.6 of the Sydney LEP includes provisions that allow for variation of development standards in certain circumstances where compliance with the standard is unreasonable or unnecessary and there are sufficient environmental planning grounds to justify contravening the development standard.

Clause 4.6 requires the concurrence of the Secretary of the Department of Planning, Industry and Environment. However, all consent authorities have been granted assumed concurrence under *Planning Circular PS 20-002 Variations to Development Standards* (5 May 2020). The assumed concurrence includes a condition that numerical standards (such as height of buildings) cannot be varied by greater than 10% if determined by a delegated authority. It is noted that this restriction does not apply where the Council or Planning Panel is the decision maker. Accordingly, the assumed concurrence applies.

The proposed height variation is justified for the following reasons.

- The extent of the building height non-compliance is minor with the majority of the building height variance generally 1.2m or less (10%), with a small portion of the proposed building exceeding the height limit by 2.2m (18.3%) for a small portion of building to accommodate clerestory skylights. The extent of the height exceedance for the skylights is limited to 3% of the roof area.
- The building height non-compliance is required to accommodate the lift overrun and required flood planning levels along Wentworth Park Road which is subject to the 1% AEP flood event.
- The proposed non-compliance is contained in a recessed upper level that will not impact on the adjoining residential properties to the southwest or southeast of the site. The clerestory skylights have been carefully located and integrated with the roof design to minimise impacts, such as views and overshadowing.
- The proposal will not significantly impact views from properties on Bellevue Street, or public views from Wentworth Park.
- The proposal represents an appropriate built form on the site and is compatible with surrounding built form character and does not impact the significance of the heritage conservation area.
- The proposal accommodates new and increased affordable housing on the site essential social
 infrastructure and is consistent with the objectives of the Housing SEPP and the City of Sydney's
 LSPS. The minor height variation facilitates an additional 11 affordable housing apartments on the
 site within a wholly affordable housing development.
- Visual and streetscape impacts will be negligible as the building is designed to appear as 3-storeys from Wentworth Park Road, with the upper-level setback and rooftop landscaping. The proposed skylights have been carefully designed and integrated with the roof to ensure no impacts to surrounding properties.
- Any additional overshadowing impacts will be minor and there would be no significant increased overshadowing to adjoining dwellings. All adjoining dwellings maintain a minimum of 2 hours of solar access in mid-winter.



The proposal is in the public interest as it will increase the amount of affordable housing on the site. The proposal contributes to the housing needs of the community through renewal and provision of increased affordable housing in a highly accessible location, close to transport, open space, and services.

On this basis the variation is considered to be appropriate, justified and in the public interest.



1 Introduction

This report has been prepared to request a variation to a development standard subject to Clause 4.6 of the *Sydney Local Environmental Plan 2012* (Sydney LEP) in connection with a development application for development of residential flat building for affordable housing at 82 Wentworth Park Road, Glebe.

The site is currently zoned R1 General Residential under the Sydney LEP and the following built form controls apply:

- FSR of 1.75:1 (Figure 1)
- Maximum height of 12m (Figure 2)

The State Environmental Planning Policy (Housing) 2021 (Housing SEPP) provides for an additional 0.5:1 FSR for providing more than 20% affordable housing as part of a development. This allows the development to exceed the mapped FSR control of 1.75:1 for the site in Sydney LEP. The proposal has an allowable FSR of 2.25:1 under the Sydney LEP and Housing SEPP, with the revised development proposing a compliant FSR of 1.85:1.

The proposal exceeds the maximum building height due to design measures to accommodate the bonus floor space provided by the Housing SEPP and to facilitate increased affordable housing on the site.

The proposed floorspace is below the maximum allowable FSR available. The proposed floorspace is appropriately accommodated on the site through a minor variation to height, rather than accommodating the additional floorspace within the 12m height limit which would result in increased bulk, scale, and amenity impacts.

The height exceedance generally does not exceed more than 1.2m (10%) except in limited circumstances where the building height non-compliance is 2.2m (18%) for a small part of the building. This exceedance is limited to a 3% of the roof area and is required to accommodate clerestory skylights in the revised proposal.

The proposed skylights will achieve better outcomes for the site including cross ventilation and amenity outcomes, while not resulting in any significant impacts to surrounding properties. The skylights have been carefully designed and located to minimise any potential impacts on neighbours including views and overshadowing.

A minor height increase is also required to provide sufficient allowance to accommodate the lift overrun. The minor height exceedance for the lift overrun is no greater than 1.35m. The minor increase does not result in any impacts.

Clause 4.6 of the Sydney LEP includes provisions that allow Council to vary development standards in certain circumstances. The objectives of clause 4.6 are:

- To provide an appropriate degree of flexibility in applying certain development standards to particular development
- To achieve better outcomes for and from development by allowing flexibility in particular circumstances.

Clause 4.6 requires Council to consider a written request from the applicant that seeks to justify the contravention of the development standard by demonstrating that:

- Compliance with the development standard is unreasonable or unnecessary in the circumstances
- There are sufficient environmental planning grounds to justify contravening the development standard.



In making its determination Council must also consider whether the proposed development will be in the public interest because it is consistent with the objectives of the particular standard and the objectives for development within the zone in which the development is proposed to be carried out.

Clause 4.6 requires the concurrence of the Secretary of the Department of Planning, Industry and Environment. However, all consent authorities have been granted assumed concurrence under *Planning Circular PS 20-002 Variations to Development Standards* (5 May 2020). The assumed concurrence includes a condition that numerical standards (such as height of buildings) cannot be varied by greater than 10% if determined by a delegated authority. It is noted that this restriction does not apply where the Council or Planning Panel is the decision maker. Accordingly, the assumed concurrence applies.

The Department of Planning, Industry and Environment has issued Varying Development Standards – A Guide 2011 to assist applicants in applying to vary development standards. The guide sets out a 'five part test' which has been established by the NSW Land and Environment Court which may be considered in applying Clause 4.6 to determine whether the objection to the development standard is well founded.

The matters outlined above have been considered and addressed by this report.



Figure 1: Maximum floor space ratio

FPDplanning





2 Site location and context

2.1 The site

The site is located at 82 Wentworth Park Road, Glebe, and is legally described as Lot 1- 4 DP82924. The site has an approximate site area of 1,633sqm.

The site is bound by Wentworth Park Road to the east, Bellevue Street to the west, Cardigan Street to the south and the Glebe and Wentworth Park railway viaducts to the north. The site is directly opposite Wentworth Park, a significant regional open space asset.

The site is occupied by 17 social housing dwellings comprising semi-detached dwellings and townhouses. The site has numerous trees within the boundary, particularly along on the northern and western boundary, and mature heritage-listed street trees are located along Wentworth Park Road.

To the rear of the site is a steep rock shelf between 3-10 metres high resulting in a significant level change to Bellevue Street in this location. Two to three storey residential terraces and Thomas Portley Reserve, a small local park and playground, are located on Bellevue Street.

To the south of the site is Cardigan Street and the carpark of the neighbouring commercial uses which are located in two storey buildings located between Cardigan Lane and Bellevue Street. A series of two storey terraces front Wentworth Park Road to the south of the site. The surrounding residential uses are predominantly low scale Victorian terraces and semi-detached housing or converted warehouse apartments.



Figure 3: Subject site



3 The proposal

The proposed development is for a four-storey residential apartment building providing 43 affordable housing dwellings. Key aspects of the proposal are described in further detail below.

3.1 Yield and dwelling mix

The revised proposed development will provide an FSR of 1.85:1, complying with the FSR control of 2.25:1 (1.75:1 + 0.5:1) available under the Sydney LEP and Housing SEPP. The proposal includes 43 new apartments to renew and increase affordable housing supply (a significant increase from the 17 existing social housing dwellings on site). The following apartment mix is proposed in the revised proposal:

- 4 x studio (9.3%)
- 29 x 1 bedroom (67.4%)
- 10 x 2 bedroom (23.3%)

3.2 Built form and design

The proposed development has been designed to respond to the local context and the proposal is in keeping with the existing scale and grain of the streetscape of the heritage conservation area. The proposal responds to the 2-3 storey terraces in the surrounding area, presenting as a 3 storey building along Wentworth Park Road, with the 4th storey setback and articulated with lighter materials to minimise the scale of the built form and mimimse impacts on views from surrounding properties.

The proposal includes terrace-style apartments and a stagged setback along Wentworth Park Road, with alternating projecting and recessive bays to also articulate and modulate the façade and break up building mass.



Figure 4: View from Wentworth Park Road





Figure 5: View from the north of the site on Bellevue Street



Figure 6: North Elevation (Wentworth Park Road)



4 Extent of variation to development standard

This clause 4.6 Variation Request seeks a variation to the 12m height control for the site.

This building height non-compliance results in a minor variation to the building height control to facilitate the renewal and increase in affordable housing on the site. The proposal will facilitate the provision of 43 affordable housing dwellings on the site.

The proposal has an allowable FSR of 2.25:1 under the Sydney LEP and Housing SEPP, with the revised development proposing an FSR of 1.85:1. The Housing SEPP provides for an additional 0.5:1 FSR for providing affordable housing as part of a development. This allows the development to exceed the mapped FSR control of 1.75:1 for the site in Sydney LEP.

The proposal exceeds the maximum building height due to design measures to accommodate the bonus floor space provided by the Housing SEPP to facilitate increased affordable housing on the site and to accommodate the 1% AEP flood level requirements for the site.

The building height non-compliance is required to accommodate the required flood planning levels along Wentworth Park Road which is subject to the 1% AEP flood level. The proposal addresses the required flood planning levels, which results in the need for additional building height, particularly at the front of the site where the site slopes to Wentworth Park Road.

In response to the RFI received on 21 June 2023, the proposal was revised to include clerestory skylights to improve solar access and cross ventilation to upper-level units. A minor height exceedance is required to accommodate the skylights. The extent of variation is limited to 3% of the total roof area and does not result in any significant impacts to surrounding properties.

The proposed skylights will achieve better outcomes for the site including improved cross ventilation and amenity outcomes, while not resulting in any significant impacts to surrounding properties. The skylights have been carefully designed and located to minimise any potential impacts, such as views and overshadowing.

A minor height increase is also required to provide sufficient allowance to accommodate the lift overrun. The minor height exceedance for the lift overrun is no greater than 1.35m. The minor increase does not result in any impacts.

The proposed floorspace is below the maximum allowable FSR available. The bonus floorspace is appropriately accommodated on the site through a minor variation to height, rather than accommodating the additional floorspace within the 12m height limit which would result in increased bulk, scale, and amenity impacts. proposal also appropriately responds to the required flood planning levels, which necessitates the need for additional height on the site to accommodate the higher ground floor levels.

The proposal provides significant public benefit in the form of new and increased affordable housing. Despite the non-compliance, the proposed development does not result in any unreasonable amenity impacts to adjoining properties, heritage conservation area, or public domain.

The height exceedance generally does not exceed more than 10% (1.2m) except in limited circumstances where the building height non-compliance is 2.2m (18%) for a small part of the building. This exceedance is limited to 3% of the building area and results from inclusion of clerestory skylights as recommended in the RFI received in June 2023.

The extent of the variation is illustrated in Figure 7, 8 and 9 and at Appendix A.



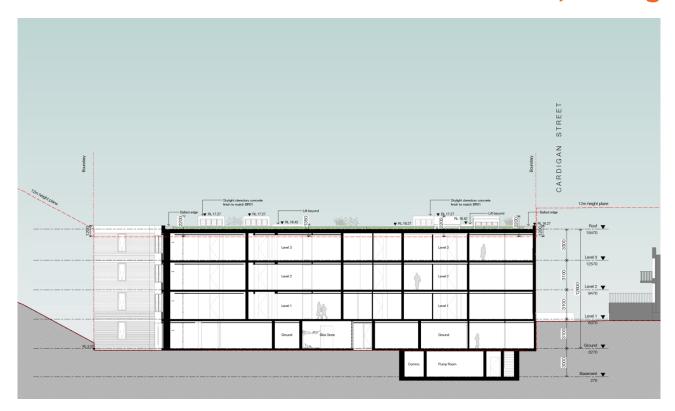


Figure 7: Extent of variation – cross section

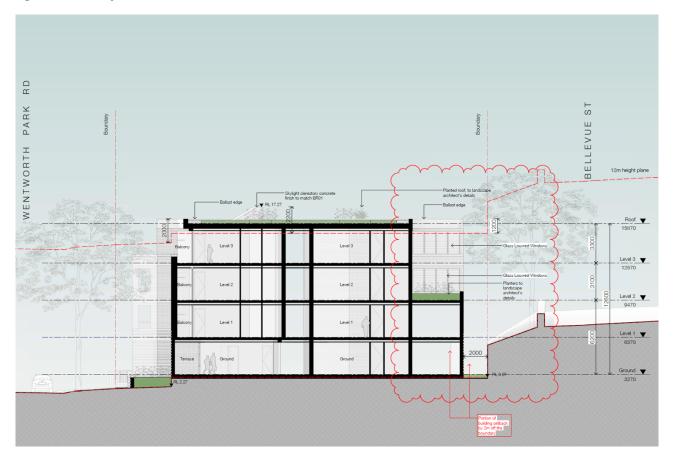


Figure 8: Extent of variation – cross section



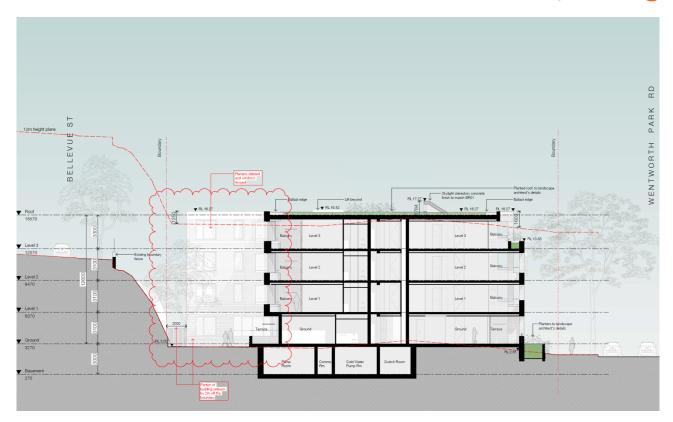


Figure 9: Extent of variation – cross section



5 Justification of variation

This section of the report provides consideration of the requirements of Clause 4.6 as well as the 'five part test' set out in *Varying Development Standards – A Guide 2011*.

5.1 Consideration of Clause 4.6 requirements

Clause 4.6(3)(a): compliance with the development standard is unreasonable or unnecessary in the circumstances of the case

Compliance with the development standard is considered unreasonable and unnecessary in this instance.

As demonstrated in the sections at Figure 7, Figure 8 and Figure 9 the variation will have negligible impact on the amenity of the surrounding area and will not impact on the ability of the proposal to achieve the relevant objectives of the Sydney LEP as set out in Clause 4.3 – Height of Buildings and for the R1 General Residential zone which applies to the site.

Clause 4.6(3)(a): there are sufficient environmental planning grounds to justify contravening the development standard

There are sufficient environmental planning grounds to justify the proposed variation as outlined below.

The proposal exceeds the maximum building height due to design measures to accommodate the bonus floor space provided by the Housing SEPP to facilitate increased affordable housing on the site and to accommodate the 1% AEP flood level requirements for the site.

The building height non-compliance is required to accommodate the required flood planning levels for the site which is subject to the 1% AEP flood event. The level established to comply with flood level requirements is RL +2.77 +0.5m (RL + 3.27). The proposal includes the required flood planning levels, which results in the need for additional building height, particularly at the front of the site where the site slopes to Wentworth Park Road.

The proposed height exceedance is required to accommodate clerestory skylights as recommended in the RFI received in June 2023 to improve solar access and cross ventilation to upper-level units. A minor height exceedance is required to accommodate the skylights; however, the extent of variation is limited to 3% of the total roof area and does not result in any significant impacts to surrounding properties.

The proposed skylights will achieve better outcomes for the site including improved cross ventilation and amenity outcomes, while not resulting in any significant impacts to surrounding properties. The skylights have been carefully designed and located to minimise any potential impacts, such as views and overshadowing.

A minor height increase is also required to provide sufficient allowance to accommodate the lift overrun. The minor height exceedance for the lift overrun is no greater than 1.35m. The minor increase does not result in any impacts.

The proposed floorspace is below the maximum allowable FSR available. The bonus floorspace is appropriately accommodated on the site through a minor variation to height, rather than accommodating the additional floorspace within the 12m height limit which would result in increased bulk, scale, and amenity impacts. The proposal also appropriately responds to the required flood planning levels, which necessitates the need for additional height on the site to accommodate the higher ground floor levels.



The proposal provides significant public benefit in the form of new and increased affordable housing. Despite the non-compliance, the proposed development does not result in any unreasonable amenity impacts to adjoining properties, heritage conservation area, or public domain.

The height exceedance generally does not exceed more than 10% (1.2m) except in limited circumstances where the building height non-compliance is 2.2m (18.3%) for a small part of the building. This exceedance is limited to 3% of the roof area and is required to accommodate the proposed clerestory skylights in the revised proposal.

The building height non-compliance is justified by the provision of new and increased affordable housing (critical social infrastructure) on the site, the need to respond to the required flood planning levels and providing better outcomes through improved amenity for residents. The minor building height non-compliance provides for an additional 11 affordable housing apartments on the upper level and supports increased affordable housing supply in the local area.

The building height non-compliance will not result in any adverse amenity impacts. From a visual and streetscape point of view the minor extent of the variation means that the impacts would be negligible from the public domain or when viewed from surrounding properties.

In summary the variation will result in negligible environmental impacts, whilst enhancing affordable housing supply, responding to flood planning requirements on the site and delivering better amenity outcomes.

Clause 4.6(4)(a)(ii) the proposed development will be in the public interest because it is consistent with the objectives of the particular standard and the objectives for development within the zone in which the development is proposed to be carried out

The proposed development is consistent with the objectives of Clause 4.3 Height of Buildings as shown in Table 1 and the objectives of the R1 General Residential zone which applies to the site as shown in Table 2. *Table 1: Consideration of Clause 4.3 Height of Buildings objectives*

Objective	Consideration			
To ensure the height of development is appropriate to the condition of the site and its context	The building height non-compliance is compatible with the will the surrounding built form context. The building design seeks to respond to and enhance the local character through high quality building design and use of materials consistent with the local character. The proposed building provides terrace style dwellings along Wentworth Park Road and provides staggered building setbacks to reduce bulk and scale and align with surrounding developments.			
To ensure appropriate height transitions between new development and heritage items and buildings in heritage conservation areas or special character areas	The proposed development provides an appropriate height transition to heritage items and does not impact the significance of the heritage conservation area. The proposed building is appropriately scaled and setback to reduce bulk and scale and minimise impacts.			
To promote the sharing of views outside Central Sydney	The building height non-compliance will not impact on significant views and promotes view sharing. The proposed building has been designed to minimise impacts to views. Views to Wentworth Park Road Underbridge and viaduct, Wentworth Park, Sydney CBD (from Bellevue Street) and views within the Lyndhurst Conservation Area will be retained.			

Table 2: Consideration of objectives of the R1 General Residential zone

Objective	Consideration				
To provide for the housing needs of the community	The proposal will provide the housing needs of the community through the delivery of 43 new affordable housing dwellings (an increase from the 17 social housing dwellings currently on the site). The building height noncompliance will support additional affordable housing supply without resulting in any significant additional amenity impacts to surrounding properties.				
To provide a variety of housing types and densities	The proposal will enhance the variety of housing types in the area providing increased affordable housing in the local area.				
To enable other land uses that provide facilities or services to meet the day to day needs of residents	Not applicable.				
To maintain the existing land use pattern of predominately residential uses	The proposal is for a residential flat building to be used for the purpose of affordable housing.				

The proposed variation also arises due to the provision of increased affordable housing on the site, and additional FSR available for this purpose, under the Housing SEPP. The proposal will facilitate a significant increase in affordable housing on the site.

Clause 4.6(4)(b) the concurrence of the Secretary has been obtained

Clause 4.6 requires the concurrence of the Secretary of the Department of Planning, Industry and Environment. However, all consent authorities have been granted assumed concurrence under *Planning Circular PS 20-002 Variations to Development Standards* (5 May 2020). The assumed concurrence includes a condition that numerical standards (such as height of buildings) cannot be varied by greater than 10% if determined by a delegated authority. It is noted that this restriction does not apply where the Council or Planning Panel is the decision maker. Accordingly, the assumed concurrence applies, and the concurrence of the Secretary is not required.

5.2 Consideration of the 'five part test'

The Department of Planning, Industry and Environment has issued Varying Development Standards – A Guide 2011 to assist applicants applying to vary development standards. The guide sets out a 'five part test' which has been established by the NSW Land and Environment Court which may be considered in applying Clause 4.6 to determine whether the objection to the development standard is well founded. The 'five part test' establishes a number of ways that variations to development standards can be justified. A Clause 4.6 application is not required to meet all of the tests.

Table 3: Consideration of 'five part test'

Objective	Consideration				
The objectives of the standard are achieved notwithstanding non-compliance with the standard	The objectives of Clause 4.3 Height of Buildings can still be achieved, as outlined at Table 1, notwithstanding the noncompliance.				



The underlying objective or purpose of the standard is not relevant to the development and therefore compliance is unnecessary	This test is not applicable in this instance.
The underlying object of purpose would be defeated or thwarted if compliance was required and therefore compliance is unreasonable	This test is not applicable in this instance.
The development standard has been virtually abandoned or destroyed by council's own actions in granting consents departing from the standard.	This test is not applicable in this instance.
The compliance with the development standard is unreasonable or inappropriate due to the existing use of the land and current character of the particular parcel of land. That is, the particular parcel of land should not have been included in the zone.	Compliance with the standard is unreasonable in this instance as minor variation results from the provision of increased public benefit through additional affordable housing on the site and does not result in any significant impacts. The building height non-compliance does not result in an exceedance of the maximum 2.25:1: FSR under the Sydney LEP and Housing SEPP.



6 Conclusion

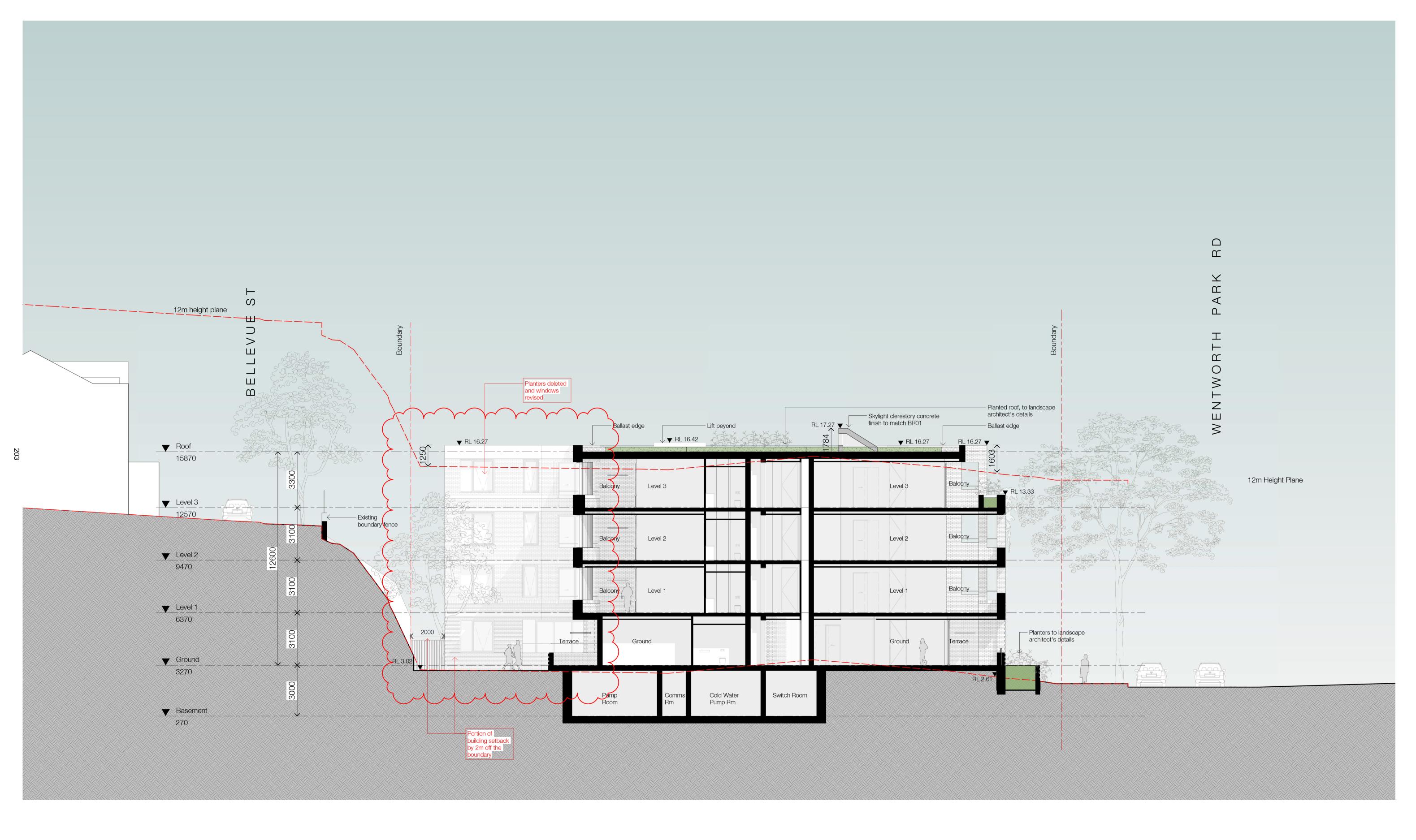
In summary the proposed variation to the maximum height of buildings control to allow a four-storey building on the site is justified on the basis that:

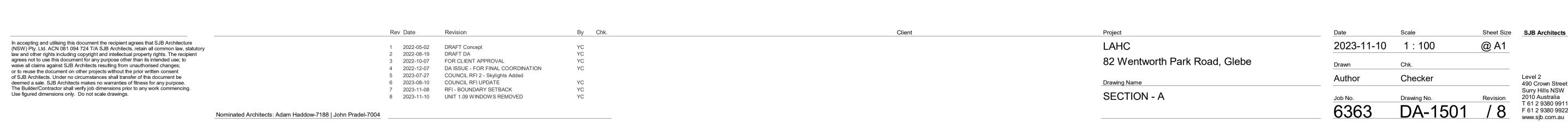
- The extent of the building height non-compliance is minor with the building height variance generally 1.2m (10%), with a small portion of at highest point of the proposed building exceeding the height limit by not more than 2.2m (18.3%) for a small portion of the building.
- The building height non-compliance is required to accommodate the required flood planning levels along Wentworth Park Road which is subject to the 1% AEP flood event.
- The proposed non-compliance is contained in a recessed upper level that will not impact on the
 adjoining residential properties to the southwest or southeast of the site. The clerestory skylights
 have been carefully located and integrated with the roof design to minimise impacts, such as views
 and overshadowing.
- The proposal will not significantly impact views from properties on Bellevue Street, or public views from Wentworth Park.
- The proposal represents an appropriate built form on the site and is compatible with surrounding built form character and does not impact the significance of the heritage conservation area.
- The proposal accommodates new and increased affordable housing on the site essential social
 infrastructure and is consistent with the objectives of the Housing SEPP and the City of Sydney's
 LSPS. The minor height variation facilitates an additional 11 affordable housing dwellings on the site
 within a wholly affordable housing development.
- Visual and streetscape impacts will be negligible as the building is designed to appear as 3-storeys from Wentworth Park Road, with the upper-level setback and rooftop landscaping.
- Any additional overshadowing impacts will be minor and there would be no significant increased overshadowing to adjoining dwellings. All adjoining dwellings maintain a minimum of 2 hours of solar access in mid-winter.

On this basis the variation is considered to be appropriate, justified and in the public interest.

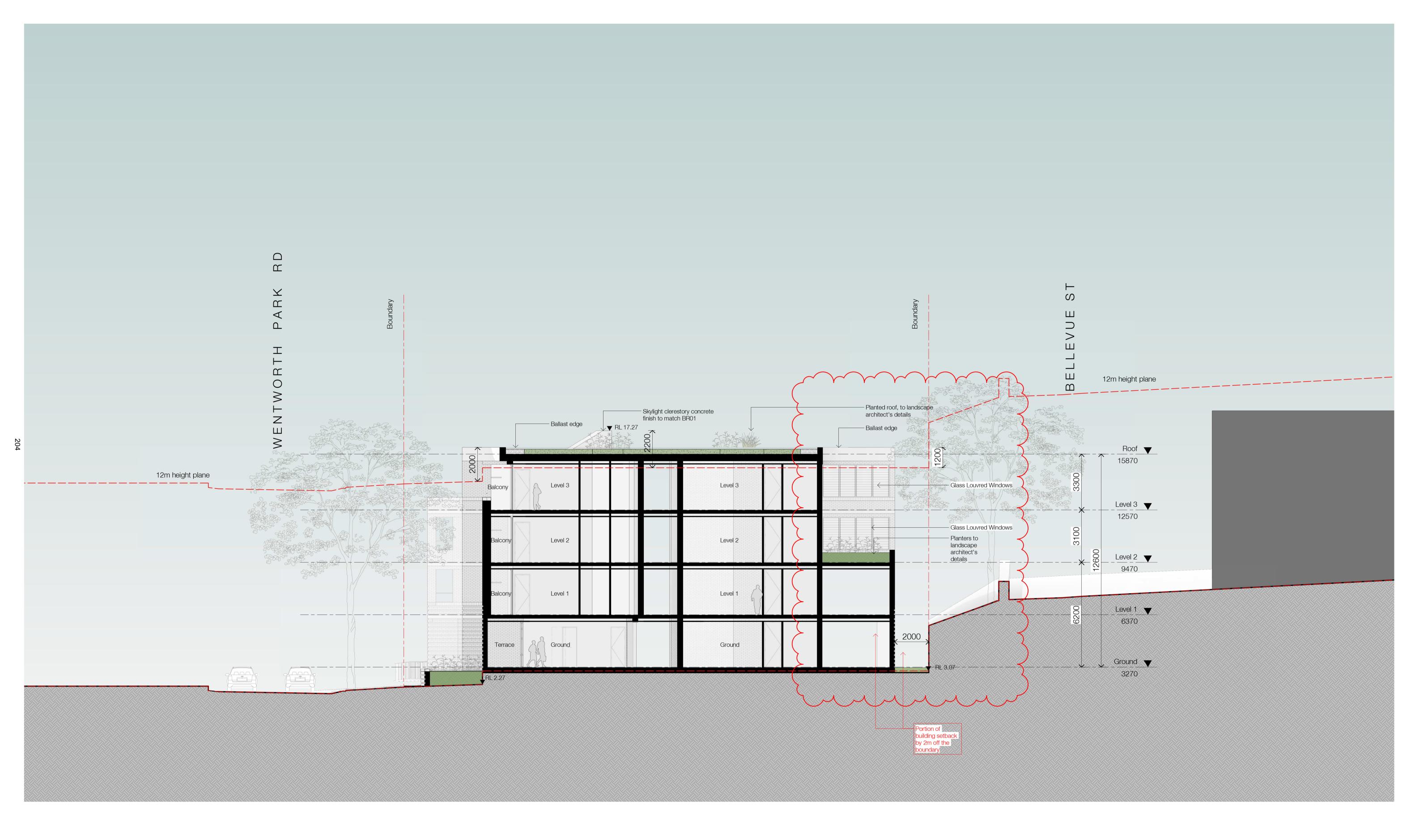


Appendix A Cross sections



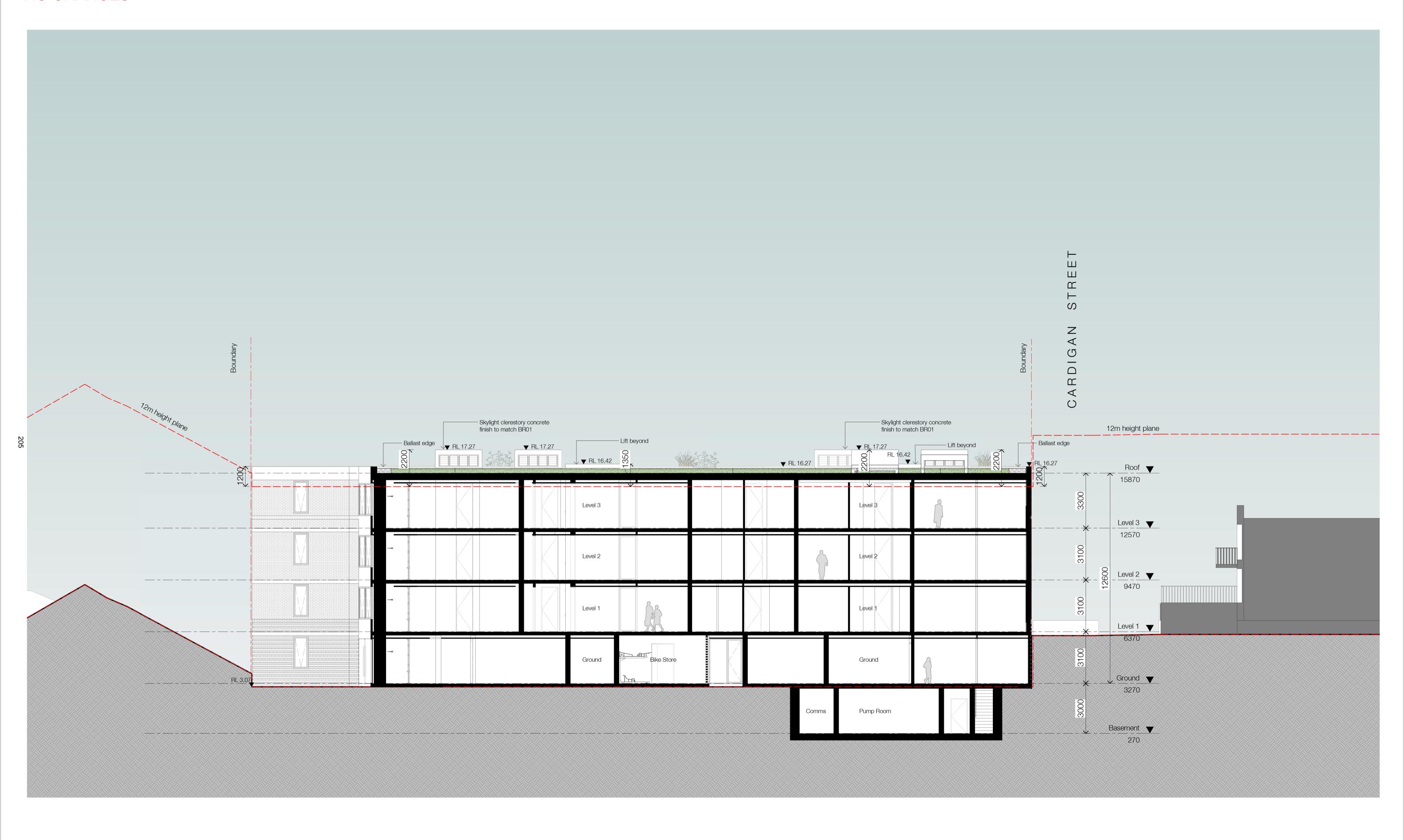


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NO CHANGES



	Rev Date	Revision	By Chk.	Client	Project	Date	Scale She	et Size SJB Architects	
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