

30 September 2025

Department of Planning, Housing and Infrastructure
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

ATTN: Adela Murimba

Dear Adela,

Re: Request for Additional Information – Mixed-use development with affordable housing at 57-61 Archer Street and 34 Albert Avenue, Chatswood (SSD-72891212)

This letter has been prepared by Mecone on behalf of Chatswood Property Pty Ltd c/o Coronation Property Co. Pty Ltd. (Coronation) (the **applicant**) in relation to the State Significant Development Application (**SSDA**) SSD-72891212 at 57-61 Archer Street and 34 Albert Avenue, Chatswood (the **site**).

This letter has been prepared as a formal response to the Department of Planning Housing and Infrastructure's (**DPHI**) letter dated on 29 August 2025, as well as the previously provided responses to Willoughby City Council (**Council**) and other Government Agencies comments.

This letter should be read in conjunction with **Table 1** and **Table 2** below and the accompanying attachments outlined below:

- **Attachment A:** Updated Architectural Plans
- **Attachment B:** Updated HRV Swept Paths
- **Attachment C:** Updated Clause 4.6
- **Attachment D:** Updated Flood Impact and Risk Assessment
- **Attachment E:** Flood Emergency Response Plan
- **Attachment F:** Updated Stormwater Management Report
- **Attachment G:** Flood Planning Levels letter
- **Attachment H:** Substation Studies
- **Attachment I:** Updated Landscape Plans
- **Attachment J:** Updated Arboricultural Impact Assessment

This letter also provides a response to ongoing discussions with DPHI in relation to refinements required to the design in order to address structural aspects of the development. Pleasingly, these changes have not resulted in any notable changes to the proposal from a planning compliance or architectural perspective.



DEPARTMENT OF PLANNING, HOUSING AND INFRASTRUCTURE

The sections below outline DPHI's key issues as identified in the Key Issues Letter issued on 29 August 2025. The below sections provide details, analysis and justification of how the applicant has addressed the requirements of the DPHI.

Issue 1: Provide an updated Flood Impact and Risk Assessment, which addresses the key flooding concerns raised by CPHR, NSW SES and Council in their responses to the RtS

In response to Council's request, and to address the matters raised by CPHR, NSW SES and Council in their respective submissions, an updated Flood Impact and Risk Assessment has been prepared by AT&L and is provided at **Attachment D**

This updated assessment comprehensively reviews the potential flood impacts on the site and incorporates a number of additional investigations and refinements, including:

- additional hydraulic modelling undertaken both with and without consideration of climate change, to ensure the assessment captures a robust range of possible scenarios;
- detailed analysis of changes in flood hazard during the PMF, providing a clearer understanding of site safety and resilience in an extreme flood event;
- afflux mapping, to demonstrate that the proposal does not result in any unacceptable increase in flood levels on surrounding properties; and
- confirmation of sewer diversion plans, which have now been approved by Sydney Water and are therefore no longer a matter of uncertainty.

To provide greater clarity on site-specific conditions, confirmation of Flood Planning Levels has been sought and is provided at **Attachment G**. Given the natural slope of the site, two distinct sets of flood planning levels apply for Bertram Street (basement entry) and for Archer Street lobby frontage. These levels are summarised in the table below:

Bertram Street Basement Entry		Archer Street Lobby	
Flood Event	Level (m AHD)	Flood Event	Level (m AHD)
1% AEP	88.08	1% AEP	88.41
1% AEP (Climate Change)	88.08	1% AEP	88.42
PMF	88.29	PMF	88.69
Flood Planning Level	88.38	Flood Planning Level	88.71

In accordance with Willoughby's Development Control Plan (WDCP), freeboard has been applied to the above levels to ensure a conservative approach to risk mitigation. Specifically, a 300 mm freeboard is proposed for flood levels at Bertram Street and Archer Street, while a 500 mm freeboard is proposed for basement entries at 32 Bertram Street and Albert Avenue. These freeboard allowances ensure the development is protected against all reasonably foreseeable flood risks, including climate change, and are consistent with best practice in floodplain risk management.

Importantly, this design approach balances flood resilience with broader planning objectives. The adoption of freeboard has been carefully integrated with the design to ensure that street-level connections and active frontages are maintained, thereby supporting the urban design principles and mixed-use precinct outcomes sought by the planning framework. The adjusted RLs for the proposed, based on the updated flood planning levels, are demonstrated in the revised Architectural Drawings at **Attachment A**.

As part of the design refinement process, the basement entry ramp has also been relocated further north. This adjustment has been made to accommodate the new culvert along the southern property boundary, ensuring compatibility between stormwater management infrastructure and vehicle access without compromising flood performance or accessibility.

Additionally, and in response to the comments of CPHR, NSW SES and Council, an updated Flood Emergency Response Plan and Updated Stormwater Management Report has been prepared by AT&L and is provided at **Attachment E** and **Attachment F** respectively.

The Plan outlines site-specific measures for the safe and effective management of flood events, including evacuation protocols, communication strategies, and coordination with emergency services. Its preparation reflects a proactive commitment to ensuring occupant safety during extreme events, consistent with the principles of the NSW Flood Risk Management Manual (2023)

Issue 2: The Department notes that private waste collection is proposed, however it has not been demonstrated that Council's residential waste collection is not feasible due to site or other constraints.

Explore options, including design amendments (such as rearranging the basement layout/reduction of parking) to demonstrate how the proposal could accommodate onsite residential waste collection by Council's waste vehicles (10.5m length and 4.5m clearance) in accordance with Council's waste management policy.

This should also include details and justification for options which have been considered but are not feasible.

The Department has requested that the feasibility of accommodating Council's standard residential waste collection be further explored, including potential design amendments (such as reconfiguration of the basement layout or reduction in parking). In response, additional options analysis has been undertaken to examine whether the proposal could support onsite collection by Council's standard heavy rigid waste vehicle (HRV) with a length of 10.5 metres and clearance of 4.5 metres, consistent with Council's Waste Management Policy.

As part of this review, detailed swept path testing has been undertaken using Council's specified vehicle dimensions. The results, provided at **Attachment B**, demonstrate that HRV access to the basement is not feasible due to a number of physical and design constraints. Specifically:

- Flooding constraints - The relocation of the basement access ramp further north was required to accommodate the new stormwater culvert along the southern property boundary. This adjustment has had flow-on effects on ramp geometry and access clearances, which now prevent a HRV from safely manoeuvring into or within the basement.
- Basement clearance - The structural clearance of 4.5 metres required to accommodate Council's HRV cannot be reasonably achieved within the proposed basement design. The necessary structural adjustments would create unacceptable design inefficiencies and would conflict with both flood planning levels and structural feasibility.
- Swept path conflicts - As demonstrated in the modelling provided at **Attachment B**, HRV turning paths overlap with basement walls and structural columns. This results in unsafe and impractical manoeuvres that cannot be resolved without significant and disproportionate design compromises.

Further design options were considered, including rearrangement of the basement layout and reductions in parking to create additional space for HRV manoeuvring. However, these options were found to be unworkable, as they either failed to resolve the clearance and swept path conflicts; or created unacceptable impacts on parking supply and building efficiency, undermining the feasibility of the project and conflicting with the competition-winning scheme objectives.

Given these constraints, the design competition brief and subsequent endorsed scheme explicitly allowed for a non-compliant collection arrangement utilising an 8.5-metre. This approach recognises the site-specific limitations associated with flooding, basement access and clearance requirements, while balancing the broader design and urban outcomes sought through the competitive design process.

Further to this, the proposed MRV-based waste collection arrangement:

- is consistent with Pre-DA advice issued by Council, which confirmed that a minimum of an MRV would be acceptable for this site;
- provides safe and efficient servicing, with swept path analysis confirming that MRV vehicles can adequately manoeuvre on site; and
- preserves the integrity of the endorsed design, avoiding disproportionate structural changes that would compromise parking, active frontages and broader urban design outcomes.

The proposal has carefully explored the feasibility of accommodating Council’s standard waste collection vehicles on site. Due to flood-related constraints, ramp relocation, clearance limitations, and swept path conflicts, onsite HRV servicing is not feasible without creating significant and disproportionate design impacts.

The proposed use of a private MRV-based collection arrangement represents a practical and policy-consistent solution that ensures safe and regular servicing, while maintaining the design integrity of the endorsed scheme. As an additional contingency, HRV on-street collection remains available as a fallback option.

Issue 3: The Department notes that the RtS outlines that the substation is required in the proposed location to meet Ausgrid requirements. As requested in the Department’s previous letter dated 20 February 2025, provide further analysis of alternative substation locations, which have/can be considered. This should also include details and justification for locations which are not feasible, to support the substation location.

It is important to reiterate that the substation is already situated on the site as existing infrastructure and is required to be retained in its current location and upgraded in accordance with Ausgrid’s operational standards. Ausgrid did not request for it to be relocated. Its location must therefore balance technical and servicing requirements with urban design, heritage and amenity considerations.

Despite this and in response to the Department’s request, an options analysis was undertaken in collaboration with the project architects, and the outcomes are summarised in the annotated plans at **Attachment H** and **Figure 1**. Four potential substation locations (including the current location) were explored outlined in the image and table below.

Options	Analysis
<i>Option 01 – Within the building at ground level</i>	During the competitive design process, the substation was initially shown within the building footprint at ground level. This option would require the loss of valuable commercial floor space, lobby areas, and/or the loading dock, thereby reducing the efficiency, activation, and functionality of the building. It would also compromise site planning principles established through the endorsed design competition scheme.
<i>Previous Option 02 – Within the pocket park</i>	Consideration was given to locating the substation kiosk within the pocket park adjoining the site. However, this option would diminish the size and usability of the park and reduce the required deep soil area under the Apartment Design Guide (ADG). It would also conflict with key urban design outcomes and compromise the delivery of high-quality public open space envisaged as part of the project.
<i>Option 03 – South-west laneway</i>	Consideration of placing the substation within the south-western laneway. This location was found to have significant clash issues with piling below and would have compromised large vehicle circulation due to reduced lane width. In addition, this location required design setbacks for the substation which would not align with the boundary line step, resulting in inefficient use of space and conflicts with Ausgrid’s servicing requirements.
<i>Option 04 – Adjacent to heritage building (within existing hardstand area)</i>	The current proposal is to site the substation adjacent to the heritage house, within the existing hardstand parking area at the front of the site. This location aligns with the property boundary, avoids obstruction of the main ground plane, and integrates with the natural site elevation. Importantly, it represents the least obstructive option while ensuring compliance with Ausgrid’s technical and servicing requirements.

As iterated in the previous RTS the proposed substation location is considered the most appropriate outcome for the following reasons:

- **Heritage Considerations** - As detailed in the Heritage Impact Statement (Appendix AH of the EIS), the substation has been located to ensure no significant heritage fabric is disturbed. Adequate separation is provided between the kiosk and the heritage item, while high-quality landscaping ensures the substation remains visually recessive. The HIS confirms that primary views to and from the heritage item are retained, with the setting and curtilage of the heritage building protected.
- **Visual and Urban Design Considerations** - The kiosk is modest in scale and will be screened by landscaping treatments, mitigating visual impact on the public domain. Its placement outside of key open space and activation areas ensures that urban design outcomes such as deep soil planting, active street frontages, and pocket park provision are not compromised. The siting avoids intrusion into development massing and ensures compliance with FSR and height controls.
- **Servicing and Operational Requirements** - The location enables 24-hour access for Ausgrid for both routine servicing and emergency maintenance, consistent with network safety and reliability requirements. Its placement also ensures the substation can continue to service the broader local network, not just the proposed development.

Based on the detailed options analysis and as illustrated in the attached plans, the current location of the substation represents the optimal balance between technical feasibility, heritage protection, visual integration, and urban design objectives. Other locations considered would result in unacceptable impacts on building functionality, public open space, servicing arrangements, or heritage outcomes.

The proposal therefore demonstrates that the existing siting of the substation has been carefully tested and retained to deliver the most appropriate and sustainable reuse of existing infrastructure.

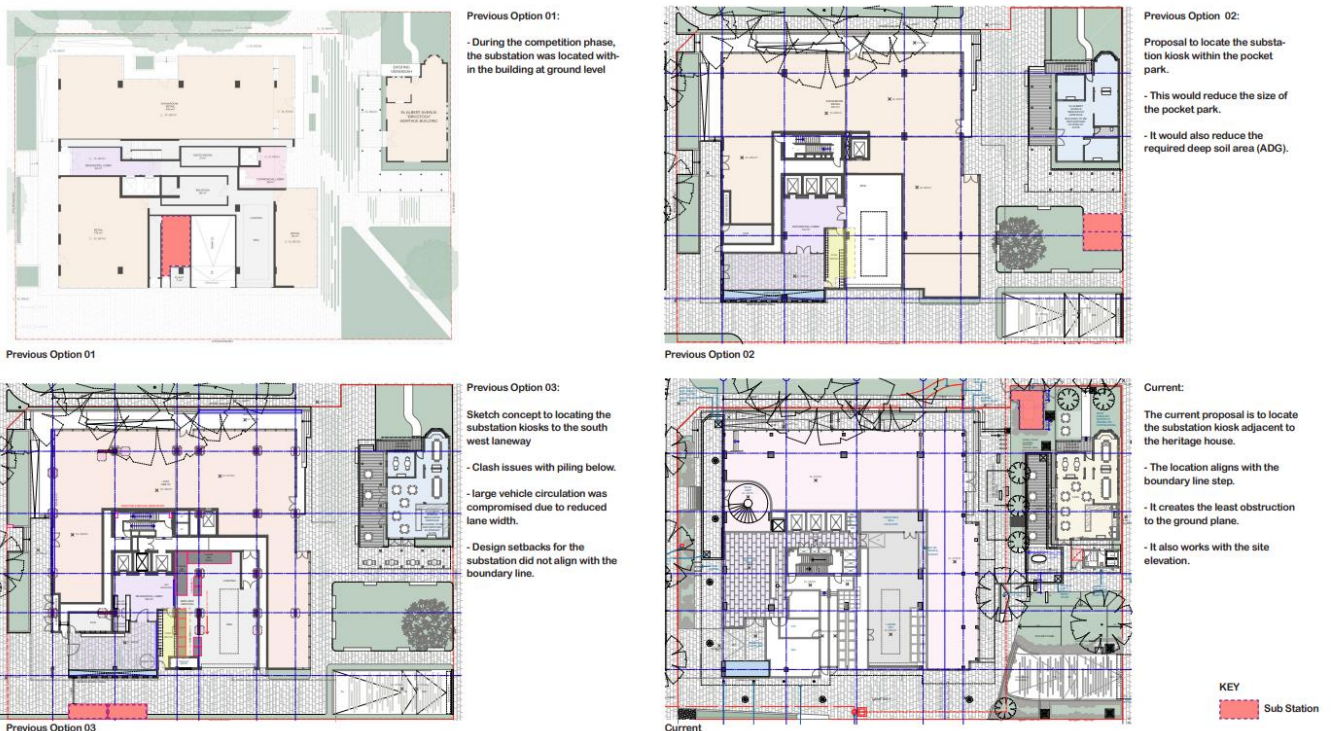


Figure 1: Options Analysis for Substation Location

Source: Woods Bagot

Issue 5: Provide an updated Clause 4.6 variation request relating to non-residential floor space to exclude the 'residential amenity' area on Level 1

An updated Clause 4.6 has been prepared by Mecone and provided at **Attachment F**. The Clause 4.6 variation now excludes the 'residential amenity' area on Level 1.

Issue 6: Provide an updated ADG compliance schedule (DA-8001) which:

- sets out the ADG information for all 150 apartments. Note: the two unit information tables in DA-8001 appear to be duplicates.
- confirms the size (in sqm) of all master bedrooms*
 - Using the width and depth dimensions provided, approximately 32 master bedrooms appear to be below the ADG 10sqm recommendation. Provide justification for any shortfalls in minimum size.

Woods Bagot has provided updated Architectural Plans, which specifically include an updated version of the DA-8001 plan. This plan outlines the solar and cross ventilation consistency with the ADG in **Attachment A**.

Following a review of the proposal's consistency with the ADG, we do note that some master bedrooms are lower than the ADG recommendation of 10sqm.

The proposed master bedroom sizes still provide sufficient space for an adequate bedding, circulation and storage. The rooms have direct access to ventilation and daylight through a full height glazed opening, ensuring a high level of amenity. the marginal variation does not result in any loss of functionality or liveability and achieves the objectives of Part 4D of the ADG by delivering a well-planned, efficient apartment layout within the site's unique structural and design constraints.

Issue 7: Provide an updated Tree Impact Plan which details the trees to be retained and removed under this application only. The Tree Impact Plan in the EIS Arboricultural Impact Assessment identifies tree removal approved under Council DAs.

An updated Tree Impact Plan has been prepared by Sidrat Verda at **Attachment J**.

Issue 8: Provide the number operational jobs to be created by the development

The proposed operational jobs for the proposal are expected to be 50 full-time equivalent positions.

ADDITIONAL DESIGN AMENDMENTS

Coronation has advised DPHI on separate occasions that design refinements would be required to respond to structural advice received from their construction team.

As part of this RFI response, and following updated flood modelling and design coordination, a series of minor architectural amendments have been made. These refinements have been informed by both technical requirements and early procurement considerations, with Coronation actively preparing to mobilise contractors upon approval.

The adjustments ensure that the development remains constructible, efficient, and consistent with the endorsed design intent, while not altering the overall built form, yield, or planning outcomes previously assessed.

The changes do not result in any notable changes or departures from the submitted scheme from a planning compliance perspective.

The amendments include:

- Relocation of the vehicular basement ramp further north to facilitate improved flood performance and integration with stormwater management.
- Minor adjustment of landscaping plans to accommodate the associated changes at ground level.

- Adjustment of the lift core to accommodate updated lift technology, optimise structural and service layouts, and ensure efficient construction.
- Mirroring of the core to improve lift operation, residential lobby layout, and egress arrangements.
- Reconfiguration of the loading bay and waste collection area to respond to revised flood planning levels and the reorientation of the core.
- Lowering of the basement RL to maintain required clearance in light of the relocated entry ramp.
- Realignment of the internal ramp to the west, to optimise basement circulation.
- Adjustment of storage units, fire pump and tank room to suit the revised basement layout.
- Minor repositioning of corridor glazing and associated western apartment layouts, arising from the adjusted core position.
- Slight reduction of the western communal open space to maintain verticality within the alcove, with overall communal space objectives retained.
- Adjustment of the eastern corridor alignment to reflect the updated eastern core wall position.
- Minor ground level modifications based on updated flooding levels, lobby and exiting adjustments from the flipped core.
- Slight reduction of parking, specifically the reduction of 4 market car parking spaces from 169 to 165 car parking spaces. A car parking breakdown is provided below.

Parking Type	Number of car parks
Affordable Housing	17
Market Housing	135
Non-Residential uses	12
Total	165 car parking spaces

Collectively, these changes represent marginal, construction-focused refinements that respond to updated technical requirements and ensure the development can be efficiently delivered. They do not materially alter the architectural design intent, public domain interface, or compliance outcomes previously considered in the assessment of the application.

Overall, all key issues raised in regard to the Request for Additional Information have been sufficiently addressed in the above as well as the attached documentation, with further refinements to the proposal as outlined above. We'd appreciate to meet with the Department with the objective to finalise the assessment of this proposal, obtain draft condition for review and to move quickly to development approval.

Should you have any queries please do not hesitate to contact the undersigned or via email at aharvey@mecone.com.au.

Yours sincerely,



Amanda Harvey
Director