

Chrisanthy Semertzidis
Senior Planner, Development Approvals and Design
Department of Transport and Planning

Uploaded via DELWP online portal

2 February 2024

**This copied document to be made available
for the sole purpose of enabling
its consideration and review as
part of a planning process under the
Planning and Environment Act 1987.
The document must not be used for any
purpose which may breach any
copyright**

**ADVERTISED
PLAN**

**Re: Application for Planning Permit No.PA2302457
437 St Kilda Road, Melbourne
Response to Request for Further Information and Referrals**

Dear Chrisanthy

We continue to act on behalf Boulevard Properties Pty Ltd, the permit applicant in respect of the land at 437 St Kilda Road, Melbourne.

INTRODUCTION

We refer to correspondence from the Department of Transport and Planning (DoTP) dated 08 September 2023, requesting further information in respect of our client's planning application. In accordance with Section 54 of the *Planning and Environment Act 1987* (the Act), we are pleased to provide a detailed response to the request below.

We also take this opportunity to respond to the referral comments authored by City of Melbourne and made at our in-person meeting and urban design discussion on 18 December 2023. Our response to these comments is addressed under sub-headings addressing City Design, Traffic, Land Survey, Waste and ESD. Accordingly, the enclosed material explains consequential changes to the design and layout of the development.

These changes (amongst others) enhance building articulation along the Slater Street podium façade (including reconfiguration of apartments at Levels 1-4 to provide rhythmic breaks), increase the ground floor setback along Slater Street to 4.5 metres (except at the eastern end of the facade), introduce a secondary resident access in Slater Street, provide additional design detail for the St Kilda Road frontage and porte cohere, and reconfigure the loading bay to accommodate Council's waste collection vehicle.

LIST OF ENCLOSURES

We are pleased to enclose the following updated application material:

- A copy of Certificates of Title with new landowner details (to be sent be separate cover).
- Letter prepared by Gadens dated 01 February 2024.

ADVERTISED PLAN

- Updated Planning Submission prepared by UPco.
- Updated Architectural Plans and Town Planning Report prepared by Bates Smart.
- Updated Landscape Plans and Supporting Design Report prepared by Barber.
- Updated Traffic Engineering Assessment prepared by Traffix Group.
- Updated Waste Management Plan prepared by Traffix Group.
- Updated Sustainable Management Plan prepared by IGS.
- Letter prepared by Li Huan, IGS, dated 01 February 2024.
- Updated 3D model.

This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright

REQUEST FOR FURTHER INFORMATION

No.	RFI Request	Response
1	Confirm whether Boulevard Properties Pty Ltd owns all lots in Plan of Subdivision 523280A. Only the title for Lot 1 of Plan of Subdivision has been provided.	We refer to the letter prepared by Gadens outlining the change in landowner for all the lots in Plan of Subdivision 523280A. A copy of the updated title will be provided when it is registered (expected in 7-14 days). Boulevard Properties Pty Ltd will remain as the permit applicant.
2	Confirm whether land within 30 metres of the site is used as a hospital or education centre. This may determine whether notice is triggered under the Commercial 1 Zone for buildings and works.	We refer to Attachment 1 which provides an aerial map showing 30 metres from the subject site (not including road). Occupation of these properties have been checked and, accordingly, we advise there is no known hospital/education centre land use(s) within 30 metres of the subject site.
3	A comprehensive material and finishes schedule for all elevations. Minimal details are provided on page 32 of the architectural set of plans and page 33 of the Urban Context Report	A comprehensive material and finishes schedule is included with all elevations, in addition to the additional description included on the material and finishes schedule included at Page 32 of the architectural plans and Appendix C of the Urban Context Report.
4	A response to Clause 53.18 Stormwater Management in Urban Development of the Melbourne Planning Scheme.	We refer to the enclosed updated SMP prepared by IGS. It explains stormwater management is in line with the Melbourne Planning Scheme Clause 53.18 'Stormwater Management in Urban Development' and Clause 19.03-3L 'Stormwater Management (Water sensitive urban design)'.



These measures are outlined at Appendix E of the accompanying SMP.

- 5 Amend architectural plans to show:
- Location of rainwater tank(s) that address Clause 53.18.
 - Dimensions of the basement car parking area, including but not limited to, car parking spaces, column locations and clearances from walls.
 - Dimensioned width of the porte cochere accessway and entry to basement vehicle ramps on the ground floor plan.
 - Dimensions of the clearance height of the underside of the porte cochere.
 - Height of proposed fences along the boundaries. It is difficult to distinguish between the fence and balcony along the northern boundary. Perhaps these could be more clearly shown.

We refer to the enclosed updated architectural plans which include responses to Items a)-e), as required. See Statement of Changes prepared by Bates Smart for more details.

ADVERTISED PLAN

- 6 For Area 42, the plot ratio is 4:1.
- The definition of plot ratio within DDO19 is as follows:
- For the purpose of this requirement, plot ratio is defined as the gross floor area of all buildings on a site divided by the area of the site, but excluding the area of stairs, loading bays, access ways or car parking areas, or any area occupied by machinery required for air conditioning, heating, power supply or lifts.*
- Can you please provide calculations of the gross floor area, excluding the areas listed above.

We refer to Development Summary – Area Schedule which confirms the plot ratio of 5.57. We recognise that the proposed plot ratio exceeds the DDO19 preferred rate of 4:1 but consider the exceedance acceptable for the following reasons:

- The nearby developments at 493 St Kilda Road has a plot ratio of 7:1, and the refurbished building (not new build) at 499 St Kilda Road has a plot ratio of 5:1.
- The proposal satisfies the DDO19 discretionary maximum building height, being less than 60 metres (except for the plant which is permitted to exceed the limitation).
- The proposal also satisfies the preferred side and rear setbacks of 4.5m metres, except for a minor encroachment of rear terraces at Level 1 (at the northeast corner of the building).
- The proposal adopts the nominated 13.7m street setback from St Kilda Road, as per DDO19.
- The proposal is designed wholly within the DDO17 Shrine Vista envelope as required by this specific planning control.
- The building envelope and mass will not result in any additional overshadowing to Fawkner Park, in accordance with

This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright



This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright

Amendment C278 and notwithstanding the future of this proposed control is uncertain.

Accordingly, we submit that the proposal has been carefully designed with a very high level of regard for and compliance with building height, setback and other envelope parameters expressed in DDOs17 and 19. The proposed plot ratio is a reasonable outcome in the context of the St Kilda Road boulevard environment and has regard to the established built form character, of large buildings, in the immediate surrounds.

CITY OF MELBOURNE REFERRALS

We provide a detailed response to the referral comments below or, in some instances, defer to the responses prepared directly by the relevant project team consultant on behalf of the permit applicant.

Urban Design Referral	Response
1 Site Layout	
<p><u>Porte Cochere</u></p> <ul style="list-style-type: none"> We do not support the proposed vehicle drop off zone along St Kilda Road. The prioritisation of vehicle access along the buildings frontage promotes the cross over on St Kilda Road which is not a desirable public outcome. Concerns arise also around the scale, depth to height proportions, of the Porte Cohere. The depth of the Porte Cohere results in limiting views through and daylight to the foyer area, and reduces the legibility between the public and private realm. Such generous allocation of street frontage for vehicle movement diminishes the pedestrian experience along this edge and introduces unsafe junction points between the vehicular driveways and pedestrian footpath areas. Configuration of the vehicle access should be reconsidered to remove from frontage and prioritise pedestrian entry. 	<p>We have had regard to the Council’s urban design concerns of the vehicle drop off zone along St Kilda Road and we have reviewed the policy guidelines at Section 2 (Movement Network) of the <i>Urban Design Guidelines for Victoria</i> and respond accordingly:</p> <ul style="list-style-type: none"> The proposal utilises the existing St Kilda Road crossover, with no changes proposed to the alignment, kerb or crossover. The referral response from The Head, Transport for Victoria does not object to the application, and the crossover arrangement to St Kilda Road is under their jurisdiction. Due to the layout of the site and fully directional vehicle access from the signalised intersection of St Kilda Road and Slater Street, it is expected that the majority of traffic generated by future residents will be to/from Slater Street, as the more direct access to the basement is provided from Slater Street on all approaches and removes the need for residents to ‘double-back’ through the porte cohere.

**ADVERTISED
PLAN**



ADVERTISED PLAN

This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright

- The porte cohere has been carefully designed to accommodate taxi/car share drop off/pick up etc to allow for a greater level of residential convenience and sense of address. The proposal is commensurate with the prestige intended for the building and which is entirely appropriate for this grand boulevard address.
- Whilst it is evident the most direct access for residents will be via Slater Street, there may be an occasional preference for residents to use the porte cochere.
- The updated ground floor plan prepared by Bates Smart includes an extended traffic island, to discourage residents turning into the basement from the porte cohere.
- Based on the analysis undertaken by Traffic Group, it is expected that limited traffic movements will utilise the porte cohere, with approximately three (3) movement in AM peak and 3 movements in PM peak.
- This is significantly less than the current traffic movements of the existing office building, noting that the St Kilda Road crossover presently provides access to 60-office car parking spaces and the building's loading bay.
- The vehicle access to the loading bay/waste collection has been redesigned to ensure Council waste vehicles can exit to St Kilda Road in a forward direction.
- Given the planned meaningful reduction in vehicle movements, and that waste vehicles will exit to St Kilda Road in a forward direction, we are satisfied that the proposal prioritises the safety of pedestrian and cyclists on vehicle crossovers, as per the Urban Design Guidelines for Victoria.

Details of the porte cohere/colonnade design and interface between the public and private realm is discussed in the next row of this table.

Colonnades

- We note that that low height colonnades should generally be avoided as they provide a low level of daylight and provide an inappropriate sense of enclosure for an external, publicly accessible space. We do not see the benefit of the addition of a colonnade along St Kilda Road in the current proposal, however, the design has the
- We refer to our meeting on 18 December 2023 and the pre-circulated presentation package prepared by Bates Smart. As presented and discussed at the meeting, Bates Smart reviewed the typical heights of lobbies and arrivals of residential buildings in the immediate surrounds along St Kilda Road and observed a clear pattern



potential to be successful should the following parameters be met:

- The colonnade should be double height to allow for better solar access and perception of openness from St Kilda Road. Aim to achieve a height that is double in proportion to the colonnade depth.
- The colonnade activates the pedestrian or resident experience. Further information should be provided to describe the amenity provided by the colonnade.
- The colonnade should provide high quality design detail for a visually rich pedestrian experience

ADVERTISED PLAN

of single storey and often discreet residential arrival experiences.

The proposed arrival experience includes a generously landscaped forecourt to St Kilda Road, serving as a natural extension of the public realm, and conveying a strong sense of St Kilda Road address. The colonnade has a height of 3.7 metres offering a pedestrian-scale and protected arrival experience, with opportunity for dappled northern light to illuminate the lobby.

We consider that the proposed double-storey porte cohere height (ie. at 3.7 metres) offers a more appropriate scale in the immediate context than the “double height” encouraged by Council which we submit would result in a four storey colonnade outcome and a design we consider would be at odds with the local context and pedestrian scale.

The forecourt design and landscape opportunities, as detailed in the Urban Context Report at Pages 48–55 and landscape package, will realise “a high quality, visually rich pedestrian experience” as sought by Council.

Deliver a well-defined public realm

- As discussed, the current proposal prioritises vehicle access to the detriment to the sense of address along St Kilda Road and the sense of pedestrian entry along Slater Street.
- The proposal should provide visual interest along the ground level that enhances the public realm and the pedestrian experience.
- We would recommend relocating drop off to occur along Slater Street, or reconsidering the vehicle drop off zone to allow for visually rich and engaging design details along the pedestrian networks and built form frontage along St Kilda Road.

As raised at our pre-application and recent urban design meeting, the relocation of the drop off zone to Slater Street is highly constrained due to the change in levels along this interface and will result in an undesirable subterranean arrival experience.

The drop off zone accessible from the existing crossover in St Kilda Road provides a desirable sense of address and wayfinding for residents, visitors and for taxi/car share drop off/pick-ups. Vehicle movements utilising the drop off zone are expected to be limited, with an estimate of only six movements at peak AM or PM (see page 56 of the UCR).

As previously discussed, the vehicle drop off zone is well set back from St Kilda Road (ie. 16.7 metres) and is located behind the landscape forecourt offering over 200sqm of landscape cover. We are confident the St Kilda Road

This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright



forecourt will ensure a well-designed extension of the public realm offering a beautifully landscaped and rich green setting and an inviting pedestrian space that is well connected with the St Kilda Road boulevard environs.

2 Building mass

Compliance with DDO heights & setbacks

- As noted above, the development appears to comply with DDO17 Shrine Visa.
- The development requires amendments to respond to the DDO19. For example the roof plant exceeds the 60 metres, large/ generous balconies/ terraces encroach into the 4.5 metres side/ rear setbacks and internal driveways exceed 4.5 metres.

The development has been designed to comply with DDO17 Shrine Vista as demonstrated in the previously submitted report from Veris dated 22 May 2023. We understand that compliance with DDO17 is a mandatory requirement. This requirement is met.

The plans confirm a maximum roof parapet height below the DDO19 preferred 60 metre maximum height. We recognise that the proposed plant exceeds the 60 metres discretionary height control by three (3) metres. We consider this a reasonable outcome given the limited size of the plant, the plant screening with light bronze metal horizontal louvres to its perimeter, the modest increase above a discretionary height along the St Kilda Road boulevard, and limited visibility of the plant.

The ground floor has been reconfigured to increase the setback of the communal amenity rooms (ie. lounge/dining spaces) to a setback of 4.5 metres in accordance with the preferred 4.5 metre setback nominated in DDO19. The plant room and pool, while located on the Slater Street boundary, are effectively subterranean.

At first floor, the north-east corner of the development provides for a single terrace located on the Slater Street boundary, albeit, adjacent to the existing street landscaped planter (Refer to Page 69 of the Bates Smart report – Slater Street Interface).

At this location, the pedestrian footpath terminates at the landscaped kerb outstand, with intensively planted vegetation in the order 1.6-1.8 metres in height. Accordingly, the Level 1 terrace will be substantially obscured by the vegetated outstand, at the approach to Fawkner

This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright

**ADVERTISED
PLAN**



This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright

Park. We are satisfied that the minor non-compliance with the discretionary 4.5m setback in this location is acceptable and can be approved.

The varied setback of the rear terraces is minimal and does not include the substantive building envelope which is composed behind the preferred 4.5 metre setbacks. The minor encroachments of the rear terraces will result in no direct visual impacts to the public or private interfaces and certainly none which could be justified as unreasonable or unacceptable.

Reinforce the fine grain and vertical rhythm of the streetscapes

- The wide frontage along Slater Street results in an excessive visual bulk when viewed from the public realm.
- The development would benefit from further articulating the mass along the Slater Street interface to establish an expressive vertical grain.
- Opportunities to provide a sense of address along Slater Street from this articulation.

The Slater Street façade has been reconfigured to amplify the planter breaks into three more distinct elements which, in turn, delivers a finer grain and demonstrably vertical rhythm to the façade. The sculptural balcony planters draw the landscape up the building podium, while the change in apartment types at the lower levels bring the central balcony breaks down to the street.

This revised Slater Street façade detail offers a refined expression to the adjacent public realm and embodies the Streamline Moderne architectural language, which is entirely respectful of the St Kilda Road boulevard surrounds.

The revised proposal also introduces a side resident access between the two cores, providing direct access to Slater Street and nearby Fawkner Park. This offers greater activation to Slater Street and provides meaningful interaction between the public and private realm and sense of address.

ADVERTISED PLAN

Respect adjoining heritage place and Special Character Area

- The development is affected by the DDO19-A42 St Kilda Road Area 42 overlay of which a key objective is to:
 - Ensure that any new development or redevelopment is at a scale that protects the visual amenity of Fawkner Park.

We refer to our meeting on 18 December 2023 and the circulated presentation package prepared by Bates Smart. As explored by Bates Smart, the development is set back between 4.95 and 7.1 metres from Fawkner Park, which not only meets and exceeds the 4.5m DDO19 preferred setback, but also exceeds the rear



- We note that the proximity of the development to the Park and caretaker's cottage poses a potentially problematic relationship, and would recommend reconsidering the building set backs on the East to facilitate the protected visual amenity of Fawkner Park and Caretakers Cottage.

This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright

setbacks of other buildings adjacent to Fawkner Park (in the order of 3.8m at 4 Slater Street, 4.24m at 505-507 St Kilda Road, and 4.5m at 509 St Kilda Road).

The development has been designed with a podium rear setback of 4.95m and the tower rear setback at 7.1m which results in a scaling down of the built form at the park interface. This approach ensures a calm and high quality backdrop to the Caretaker's Cottage and park environs which in part is characterised by an western interface of taller, intensive development. The composition has also been carefully crafted to ensure no additional shadows are cast to the park – including complying with the Council's more onerous expectations which are yet to be endorsed by the Minister.

We are satisfied that the proposal is a more than acceptable response to the objective of DDO19-Area 42 that anticipates a scale of development that protects and respects the visual amenity of Fawkner Park and we submit that it also offers an outcome superior to many of the other buildings with rear interface/s to the park.

3 Building program

Maximise activation of public realm

- Provide sense of address along St Kilda Road (see above notes on Porte Cohere and Colonnades) We refer to the above discussion and Urban Context Report prepared by Bates Smart.

Provide generous ceiling heights that allow for adaptation over time

- The current proposal proposes ceiling heights of 2700mm. We would question if the ceiling height fits the aspirations of the development, and the aspirations of St Kilda Road more broadly. Ceiling heights should remain generous to allow for better adaptability of the building over time. The proposed floor to ceiling height meets the requirements of Clause 58. We submit that the demand for residential accommodation along St Kilda Road is likely to remain in perpetuity, therefore is no demonstrable need to design for adaptability of ceiling heights for this building.

**ADVERTISED
PLAN**



4 Public interface

Activation and interface quality

- We continue to recommend measures to ensure the diverse street level activation offering is legible, permeable, and contributes to the vibrancy of St Kilda Road.
- Further exploration into the ground floor layout is needed with the intent to provide heightened amenity to the public realm.
- 1:50 street level elevations are required to ensure a high quality urban design response is achieved to the buildings public interfaces, including existing and new streets, and the new publically accessible plaza.

We refer to the more detailed renders and imagery included in the updated Urban Context Report prepared by Bates Smart. We consider that the proposal envisages a very attractive and highly desirable St Kilda Road forecourt and Slater Street landscape outcome to the public realm. Any further level of detailed design can be required by permit condition.

5 Design Detail

Tower Design

- The concept and design narrative are generally supported. However, at current, the expression of the Art Deco and Streamline Moderne motifs contributes visual bulk of the development.
- The application of the repeated façade treatment over the street wall, and tower façade creates the impression extruded mass which doesn't differentiate from the pedestrian experience or distant views. Horizontal breaks to the façade treatment, potentially to differentiate sense of address along St Kilda Road and Slater Street, should be investigated in refining the overall tower form.
- We recommend that further design investigations be undertaken to consider a greater amount of articulation to the façade, and testing the expression of the Art Deco and Streamline Moderne principles.

As described above, the now updated design introduces an additional layer of fine grain and vertical articulation along Slater Street. Based on the incorporation of these design changes, as evident in the current submission, it was our understanding from the urban design meeting in December 2023, that the Council and Department officers were satisfied with the streamlined Moderne design outcome.

This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright

Waste Referral

Response

- 1 It is a mandatory requirement for residential waste to be collected by Council. The on-site loading area must be designed to accommodate a Council MRV.

Waste collection is proposed to be undertaken onsite within the loading dock on ground floor via Council collection using the 8.8m long waste collection vehicle. We refer to the updated architectural plans.

**ADVERTISED
PLAN**



ADVERTISED PLAN

2 Table 5 needs to be recalculated to show that organic waste is 25% of the total garbage stream, not 35%, in accordance with Table 1 of the CoM 2021 Guidelines for Waste Management Plans. We refer to the updated Waste Management Plan (WMP) prepared by Traffix Group. Table 5 has been recalculated, as required.

3 Council will ultimately collect glass as a separate waste stream. Generation rates for the interim stage where glass will be collected as part of the commingled stream (i.e. no separate glass bins using Table 1 in the CoM Waste Management Guidelines) are to be provided, as well as generation rates for the final stage (with separate glass bins, using Table 2 in the Guidelines). The floor plan is only required to show the bin arrangement for the final stage given that this configuration will require the most space. We refer to the WMP and plans which can accommodate the glass collection.

This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright

4 Council requires the use of the largest bins practical to minimise collections times i.e. 1100L bins for garbage and recycling, 660L bins for glass and 240L bins for organic waste. The sizes of the glass and FOGO bins are restricted to 660L and 240L respectively due to the weight of the material. We refer to Page 5 of the updated WMP with the bin sizes, as per the Council requirements.

5 The size of the hard waste area needs to be shown on the floor plan. The development will be entitled to a monthly collection of up to 4m³ of hard waste by Council (to be specified in the WMP). A dedicated hard waste area (5.5 sqm) is illustrated on the Ground Floor plan, adjacent to the loading dock. The details of which are included in the updated WMP at Section 3.4.1.

6 Show the chute termination points on the floor plan. They are required to be fully enclosed if they are not isolated in a room from other bins and/or hard waste storage areas. The chute details are clarified on the updated Ground floor plan.

Land Survey Referral

Response

1 Removal of Easements - Prior to the commencement, excluding demolition, bulk excavation and site preparation works, or as otherwise agreed with the Responsible Authority, the owner must provide evidence to the Responsible Authority that Easements E-1 & E-2 which burden the land have been removed. Our client accepts this would be an appropriate condition but asks that the condition be amended to "prior to occupation". Our client is in a position to commence works immediately upon receiving a Planning Permit and does not want the conveyancing items/process to delay commencement.



ADVERTISED PLAN

- | | | |
|-------|--|--|
| 2 | Consolidation of Titles - Prior to the commencement of works, including demolition, all the land for the proposed development must be owned by the one entity and consolidated onto the one certificate of title to the satisfaction of the Responsible Authority. | As per above. |
| <hr/> | | |
| 3 | Access to Service Cupboards - All access leading into a service cupboard which abuts a car parking space must be dimensioned. If access into the service cupboard relies on access over an abutting car parking space, the abutting car parking space must be deleted. | We clarify that access to service cupboards does not rely on access over an abutting car parking space(s). |

Traffic Referral

Response

Referral comments from Council's Traffic Department include sub headings: car parking, bicycle parking, motorcycle parking, traffic impacts, access arrangements and loading.

We refer to the detailed response provided by Traffix Group at Table 5 of its updated Traffic Engineering Assessment which addresses each matter raised by Council in turn.

ESD Referral

Response

Referral comments from Council's ESD (department) were provided via email dated 27 November 2023.

We refer to the accompanying letter response prepared by Li Huan of IGS which provides a detailed response to each item.

CONCLUSION

We trust that the submitted material addresses the RFI items and design changes respond to the referral comments. Should you wish to discuss this application further please contact the undersigned on 8648 3500.

Yours sincerely



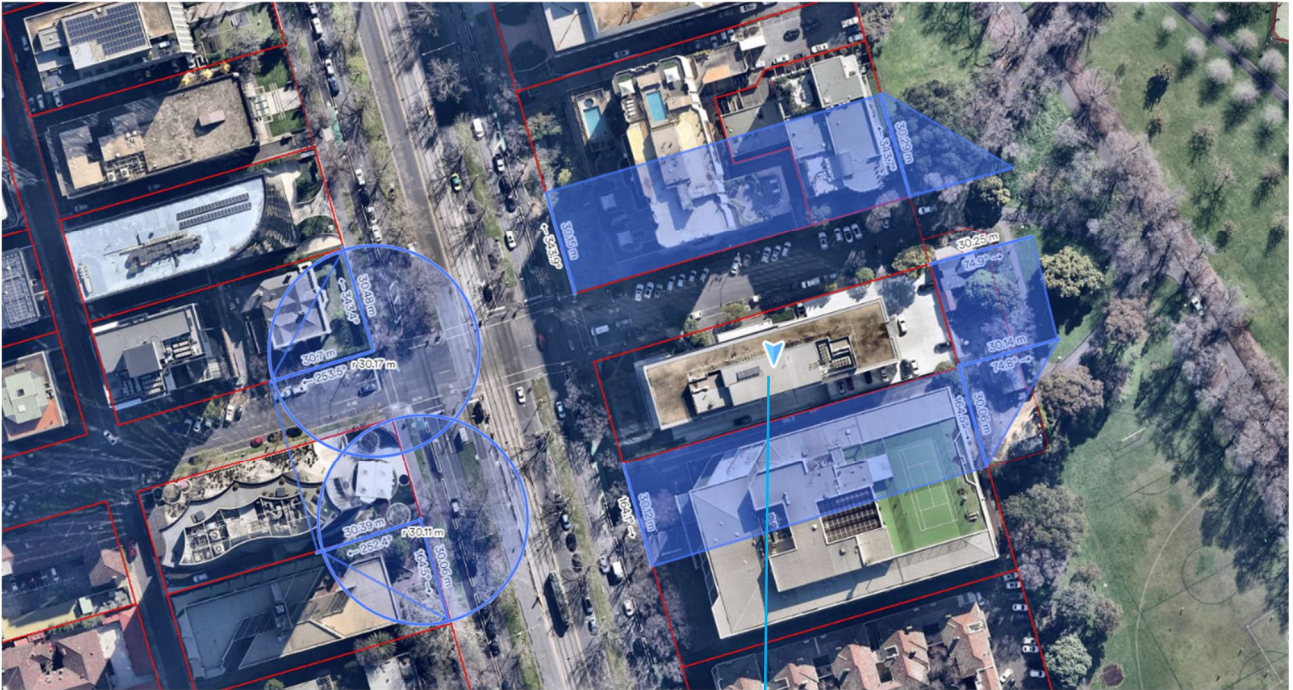
Andrea Zohar
Associate Director
azohar@upco.com.au
encl.

This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright



ATTACHMENT 1

AERIAL MAP SHOWING PROPERTIES WITHIN 30 METRES OF THE SUBJECT SITE (NOT INCLUDING A ROAD)



Source: Bates Smart

Subject site

**ADVERTISED
PLAN**

This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright