

**LEVEL 5**  
**80 GEORGE STREET**  
**PARRAMATTA NSW 2150**

URBIS.COM.AU  
Urbis Pty Ltd  
ABN 50 105 256 228

26 August 2022

Thomas Watt  
Director, Metro East & South  
Planning and Land Use Strategy  
Department of Planning and Environment

Sent via email: [thomas.watt@planning.nsw.gov.au](mailto:thomas.watt@planning.nsw.gov.au)

Dear Thomas,

## **BLACKWATTLE BAY SSP RESPONSE TO SUBMISSIONS - 31-35 BANK STREET, PYRMONT**

### **1. INTRODUCTION**

This submission has been prepared by Urbis Pty Ltd (**Urbis**) on behalf of our client, Celestino, owner of the 31-35 Bank Street, Pyrmont Site (**the site**).

Infrastructure NSW's (**INSW**) Response to Submissions (**RtS**) report for the Blackwattle Bay State Significant Precinct (**SSP**) was published on the planning portal on 29 July 2022. The report describes how INSW has responded to submissions received in 2021 during the public exhibition of the Blackwattle Bay SSP study, including making changes.

We thank the Department of Planning and Environment (**DPE**) for the opportunity to meet on 23 August, and to provide this further written submission in reply to the RtS report with final comments on the INSW proposal. We understand that DPE will consider all comments received and finalise a recommendation to the Minister for Planning for new planning controls for the study area.

#### **Celestino proposes to redevelop the 31-35 Bank Street, Pyrmont site into a world class waterfront mixed use development.**

Celestino is an Australian owned family business focused on delivering high quality, sustainable developments across Australia. Celestino is part of the Baiada Group, renowned for iconic brands Steggles and Lilydale, founded in Western Sydney by Celestino Baiada in 1916. The Baiada Group is one of Australia's largest private companies employing over 7,000 people with an annual turnover in excess of \$2 Billion.

Celestino brings this long track record with a commitment to innovation, place making and delivering excellence to the redevelopment of 31-35 Bank Street, Pyrmont. With 31-35 Bank Street, Celestino aims to make a significant contribution to the revitalisation of Blackwattle Bay.

### 31-35 Bank Street Concept Vision

*A mixed-use tower comprising activated ground floor retail, podium with a Sydney Science Park Satellite Innovation Hub, and high quality residential living above*

The establishment of the Sydney Science Park Satellite Innovation Hub at 31-35 Bank Street will merge the innovation and employment potential of research-oriented anchor institutions, high-growth firms, and tech and creative start-ups in a well-designed, amenity-rich residential and commercial environment.

Celestino supports the overarching vision and principles for Blackwattle Bay State Significant Precinct:

- The goal of developing a world class waterfront promenade and development;
- The principles for the heights of buildings; and
- The principle of a mixed-use precinct.

Key parameters required to achieve the Celestino development vision are, as follows:

- Three levels of non-residential uses including ground level retail and a maximum of 2 levels of commercial office space with a floor plate range from between 1680 sq. m and 1895 sq. m.
- Residential tower floorplates of up to a maximum 750 sq. m up to levels 6 stepping in to up to a maximum 680 sq. m above.
- Height of building RL 120 AHD
- 6.82:1 FSR

Celestino is committed to early delivery and activation of the site including the foreshore promenade and through site links between Bank Street and the waterfront; however, this is contingent on an appropriate planning framework that supports economically feasible and commercially viable development.

## 2. INSW RESPONSE TO SUBMISSION DOCUMENTS

We have reviewed the INSW RtS report, revised Explanation of Intended Effects, and Revised Design Code.

The key issues raised by Celestino in its submission during the exhibition of the Blackwattle Bay SSP Study, and Design Code are summarised, as follows:

*The overall vision and principles for Blackwattle Bay are supported however Celestino considered that several changes should be made with respect to its site at 31-35 Bank Street:*

- **Building height** – *the maximum building height should be increased from RL91.5 to RL121.1 consistent with building height principles in the SSP Study. The site is suitable and has the capacity to accommodate greater building height and still achieve acceptable amenity and design excellence outcomes.*
- **Density** – *the maximum gross floor area should be increased from 16,250sqm to 26,000sqm, commensurate with the recommended increase in building height.*
- **Non-residential floor space** – *the proposed allocation of 7,000sqm of non-residential GFA on the site does not foster an appropriate balance and there is an inequitable distribution of residential and non-residential floor space across the precinct. The site-specific built form parameters in the Design Code also do not allow appropriate sized/configured floor plates. Celestino recommends a decrease in non-residential GFA on the site to 3,000sqm.*
- **Design Code flexibility** – *greater flexibility should be allowed on the application of site-specific built form controls to encourage place-led and performance based outcomes. This is consistent with new Design and Place SEPP.*

*A detailed analysis in support of the proposed changes is included in the Celestino submission. Celestino also recommends that the planning framework be amended to allow for density and building height incentives for development that achieves design excellence through a competitive design process and provides public benefit of exceptional value. Celestino indicates its support for innovative funding mechanisms to secure additional public benefits and infrastructure however notes that a clear and transparent mechanism for identifying the public benefits to which developers must contribute must be put in place to provide certainty to investment decisions.*

The INSW RtS includes the following responses:

*Building height and density (FSR) have been determined by optimising high-quality public domain amenity outcomes with enough up-lift to spark urban renewal and achieve the vision for the precinct.*

*Non-residential floor space for the Celestino site has been reduced to approximately 4,000sqm.*

*The revised Draft Design Code provides a degree of flexibility, however it should be noted that the proposed built form controls have been determined through an extensive place-led, performance-based approach.*

*In response to the submission received, heights across the precinct have generally been lowered and gross floor areas have been reduced by 15% on average. The building height on the Celestino site has been increased to RL 100.4 AHD and the total gross floor area has been reduced to approximately 13,180sqm representing a 19% reduction. This higher reduction is reflective of applying increased separation distances and the nature of the parcel as a smaller, narrow, constrained site.*

*All built form within the precinct will be subject to design excellence, however, density and height bonuses have been removed. Information regarding infrastructure funding and delivery can be found in sections 3.5 and 4.9 above.*

*Further information regarding the changes in the revised precinct master plan can be found in the Urban Design Statement Addendum in Attachment 3.*

Celestino acknowledges that some changes have been made to the proposed planning controls for the site, in acknowledgement of the concerns raised in the Celestino submission, including:

- Increase in height to RL 100.4 AHD; and
- Reduction in the minimum non-residential floor space from 7,000 sq. m to 4,000 sq. m.

Some fundamental concerns remain with the revised suite of proposed planning controls put forward by INSW in the RtS related to:

- Building height
- Density
- Minimum non-residential floor space
- Design Code prescriptive controls and lack of flexibility
- Developer contributions for affordable housing

These fundamental concerns are described in below:

## **2. KEY CONCERNS AND RECOMMENDATIONS**

**The proposed suite of planning controls are unfeasible and will stymie urban renewal of the Blackwattle Bay waterfront.**

The proposed planning controls and development contributions in combination result in outcomes that are unfeasible. When combined with following suite of controls limit the potential for achieving high quality mixed use development of the site as they present significant challenges for commercially viable development to occur:

- Percentage of site required for new public domain foreshore promenade and through site links;
- Maximum floorplate size;
- Boundary setbacks;
- Minimum non-residential GFA;
- Design Excellence Competition; and



- State, Regional and Local Development Contributions.

### **Building envelope controls and more onerous than City of Sydney controls**

Overly prescriptive building envelope controls are onerous, and a “straight jacket” limiting the potential for design innovation. The suite of controls for building envelopes include:

- Maximum height;
- Maximum FSR;
- Maximum floorplate size;
- Minimum boundary setbacks; and
- ADG building separation distances.

The maximum 520 sq. m floor plate restriction is significantly less than City of Sydney control on maximum floor plate size for residential towers of 750 sq. m and should be removed from the Design Code altogether and instead the ADG applied, which will enable greater scope for design innovation to achieve the objectives for building separation and visual privacy.

**There is scope for greater building height whilst remaining consistent with the height of building principles established in the SSP Study and Pyrmont Peninsula Place Strategy, including:**

- No overshadowing of Glebe Foreshore;
- Lower than Obstacle Height Limitation (OSL) for Sydney Kingsford Smith Airport;
- Lower than Anzac Bridge pylon;
- Transition and differentiation achieved the proposed maximum RL 141 AHD on the Government land; and
- Not out of scale with the heights of buildings in the tower cluster identified in the Pyrmont Place Strategy for land immediately east of Anzac Bridge.

**A feasible development is possible, optimising development contributions towards local, regional and State infrastructure, if the Apartment Design Guide (ADG) is applied and the overly restrictive maximum floor plate, and building setbacks are removed.**

For Celestino to contribute to the future vision and principles of Blackwattle Bay the following four key areas should be addressed in the final planning framework, built form controls, land use mix and Design Code parameters:

1. **Building height:** **A maximum building height of RL120 AHD** should be introduced for the site. This height is consistent with the principles introduced in the SSP Study Pyrmont Peninsula Place Strategy.

2. **Density:** A maximum GFA of 20,271 sq. m can be accommodated on the site based on design testing that accompanies this submission, which equates to an FSR of 6.82:1. This GFA is commensurate with the recommended building height of RL120 AHD, and the application of SEPP 65/ADG for floorplate arrangements.
3. **Non-residential floor space:** The RtS identifies a minimum non-residential GFA of 4,000 sqm for the site. Whilst the principle to deliver employment-generating land uses across the precinct is supported, it is requested that a **non-residential GFA of 3,000 sqm** is applied to the site, which is sufficient to enable ground floor retail and two levels of commercial office space for the establishment of Sydney Science Park satellite premises.
4. **Design Code flexibility:** The Design Code should foster greater flexibility on the strict application of site-specific built form controls (such as building separation and setbacks) to encourage place-led and performance-based outcomes. **The Design Code should align with SEPP 65 and the Apartment Design Guide.** Specifically:
  - a. **Maximum floor plate restriction of 520 sq. m should be removed and compliance to ADG applied.**
  - b. **Setback to Western Distributor:** Proposed 6m minimum setback reduced to **3m**, and performance against ADG demonstrated.
  - c. **Non-residential floor plates at lower levels below RL21 should be reduced increasing solar amenity to foreshore promenade.** This is considered to offer a key public amenity improvement on the proposed building envelope controls.

**A feasible development of the site can occur that achieves the key planning and design objectives with improvements compared with the building envelope controls in the Revised Design Code in reducing building bulk at the lower podium levels, which will improve solar access to the public foreshore promenade.**

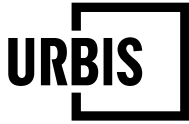
Diagrams at **Attachment A** demonstrate testing of an alternative scheme for the site with maximum height of RL 120 AHD, SEPP 65/ADG compliant floor plate design and tower shape demonstrates views and privacy is maintained with neighbouring residential towers and separation distances can result in improved outcomes for the public domain compared with the proposed controls in the Revised Design Code.

#### **Developer contributions for affordable housing**

An affordable housing contribution of 7.5% of total floor space of residential and commercial development is proposed in the RtS. This has been increased from the exhibited requirement of 5% of residential floor space.

Celestino supports the vision of affordable housing in the Blackwattle Bay precinct and are strongly of the opinion this should be aligned with the current City of Sydney policy and contribution rates for Central Sydney and on residual land:

- Non-residential rate: 1%
- Residential rate: 3%



Celestino are seeking the adoption of the current City of Sydney contributions rates for affordable housing in Central Sydney and on residual land.

### **3. CONCLUSION**

Thank you for the opportunity to provide a further submission on the NSW RtS documentation, including Revised EIE, and Revised Design Code with regard to the Celestino site at 31-35 Bank Street, Pyrmont.

The comments provided in this submission seek to ensure that the suite of planning controls that will enable the redevelopment of the site to occur, to realise the goal of developing a world class waterfront promenade and development that contributes to the broader Blackwattle Bay urban renewal.

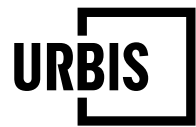
If you have any questions with regard to this submission, please do not hesitate to contact me at 0410 425 880 or [mdonaldson@urbis.com.au](mailto:mdonaldson@urbis.com.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read "M. Donaldson", with a stylized flourish at the end.

Murray Donaldson  
Director  
+61 2 8233 9953  
[mdonaldson@urbis.com.au](mailto:mdonaldson@urbis.com.au)

Attachment A – Alternative Concept Scheme, prepared by Plus Architecture.



**ATTACHMENT A – ALTERNATIVE CONCEPT SCHEME AND ANALYSIS,  
PREPARED BY PLUS ARCHITECTURE**

# 31-35 BANK STREET PYRMONT

DPIE PLANNING REVIEW &  
RECOMMENDATIONS

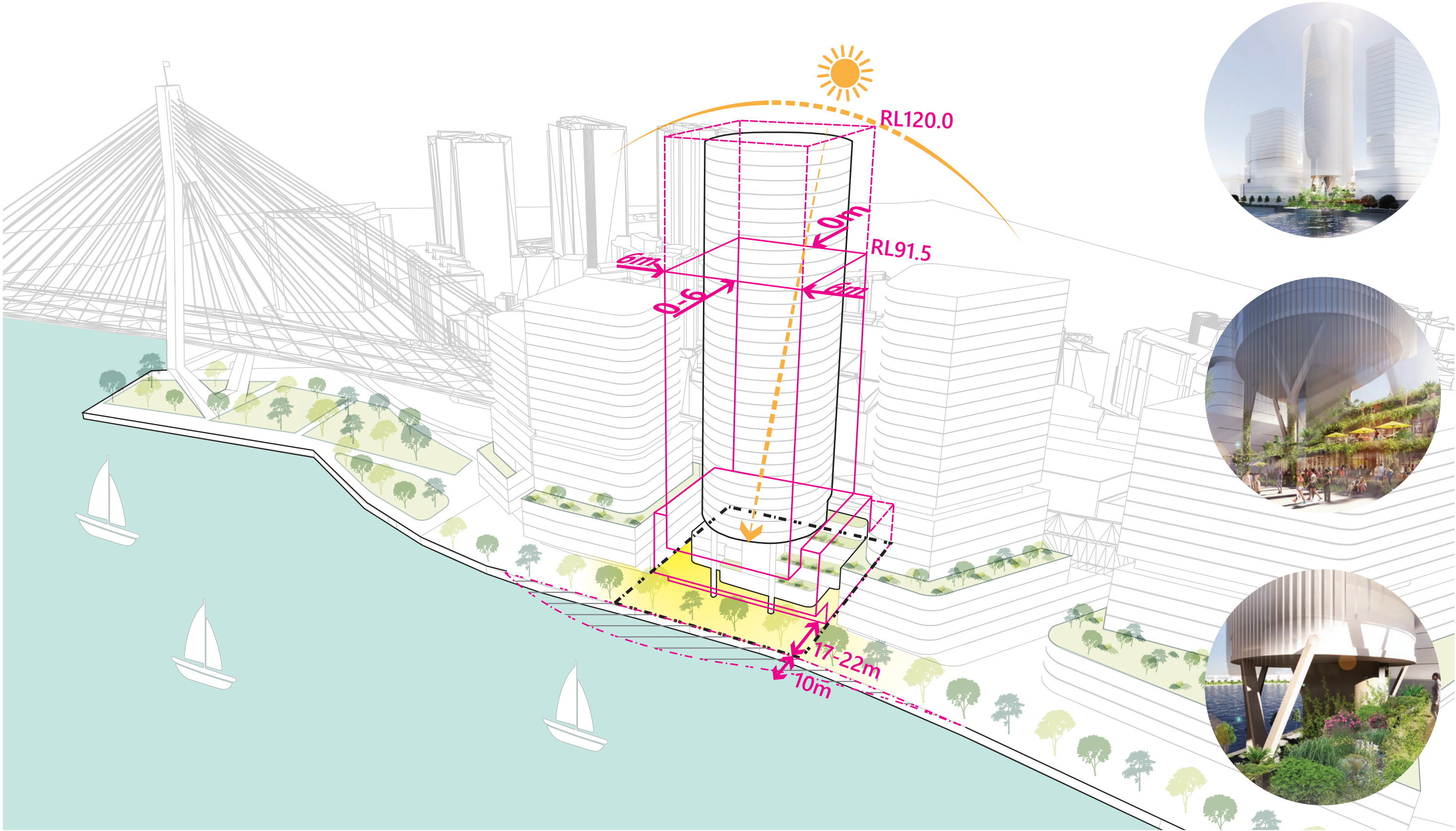
25.08.2022

# 01

## WHAT WE KNOW

WHAT WE KNOW

# CELESTINO PREVIOUS PROPOSAL





# WHAT WE KNOW

## DPIE CONTROL ENVELOPE



Figure 39 Block PLO 2 Controls

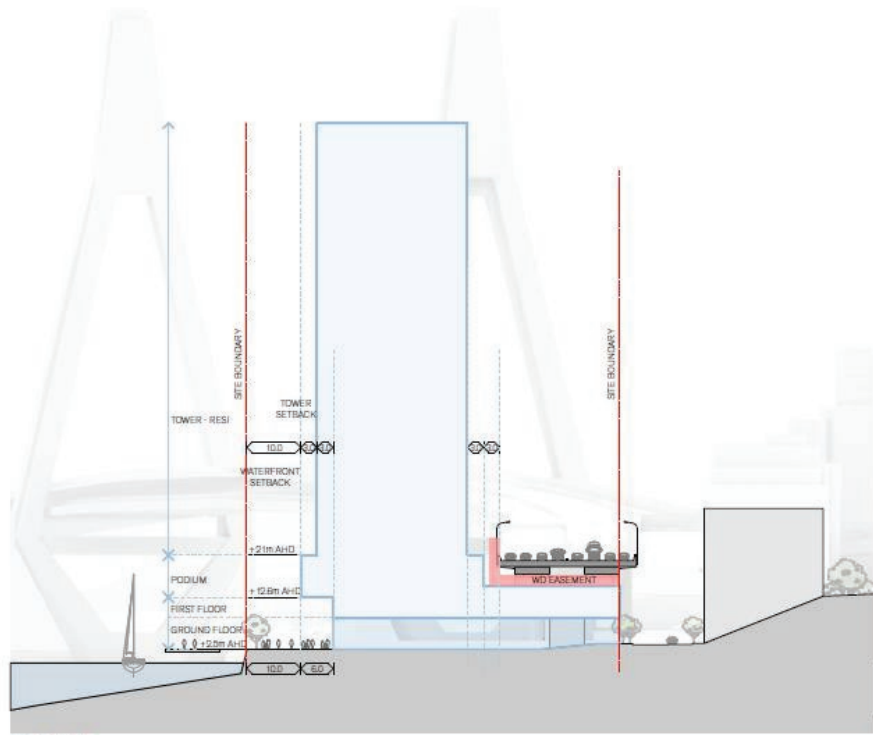
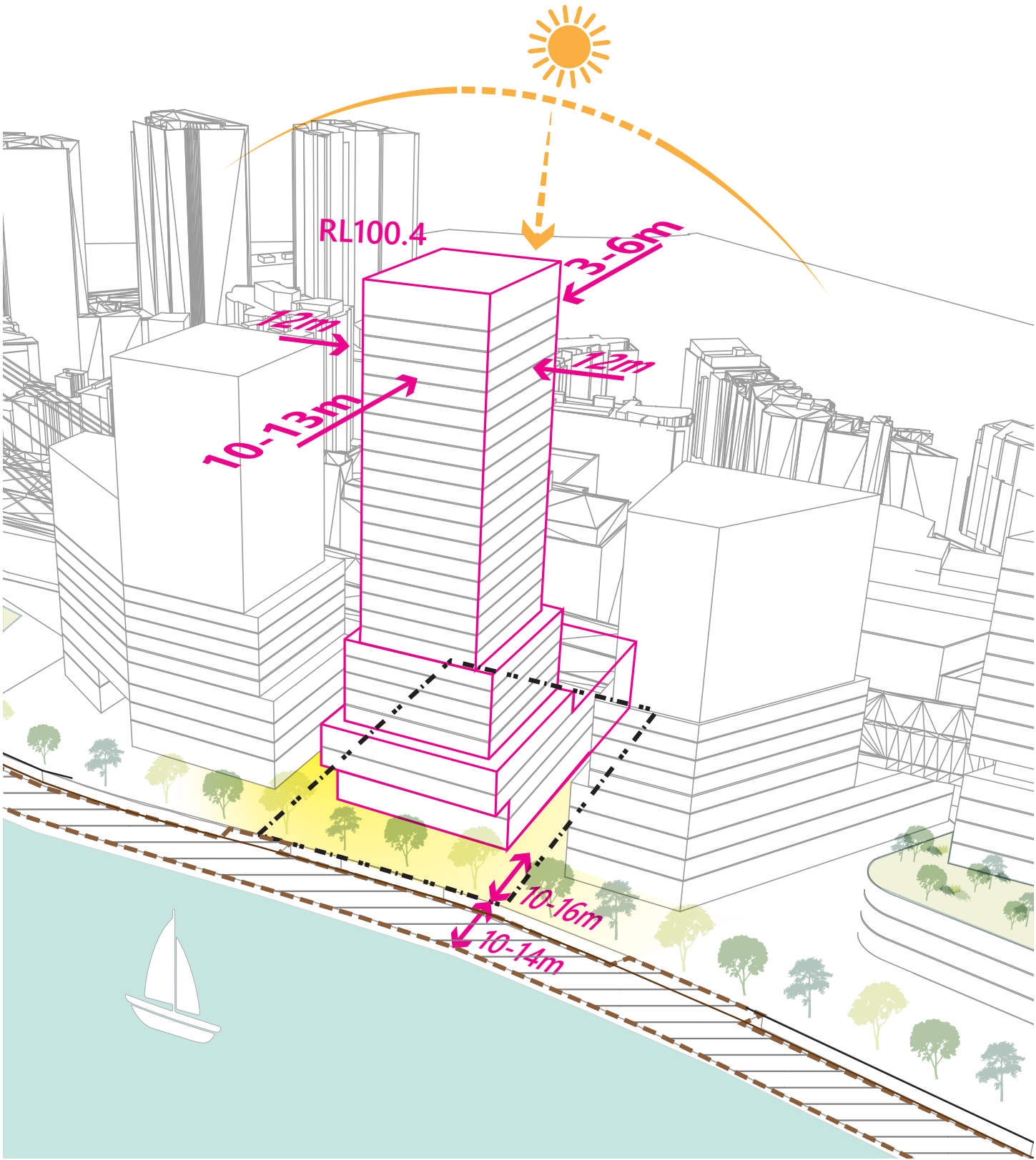


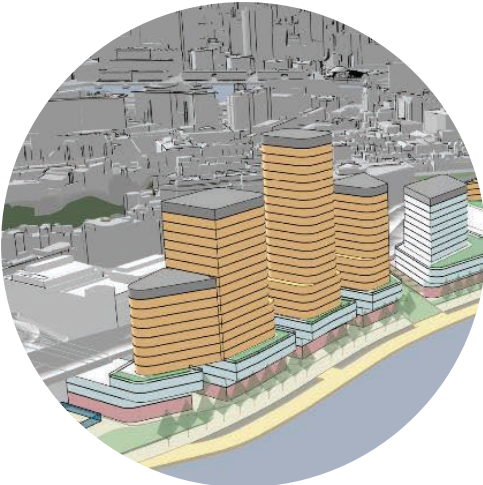
Figure 49 Section through PLO 2 (refer Figure 39)



- SUMMARY CONTROLS:**
1. AHD 100.4m height limit
  2. 13,200m2 GFA max.
  3. Setbacks per below diagrams
  4. Min. Floor to floor heights specified for us per table
  5. 520m2 floorplate maximum average over AHD 40m. (Aproximate 4-5 units)
  6. ~4,000m2 of Commercial
  7. Site area assumed as 2,971m2 (we've measured 3027m2)
  8. Solar Amenity to Promenade 12-2pm 21 June



Artistic impression (By Arterra) suggesting an articulated facade and form



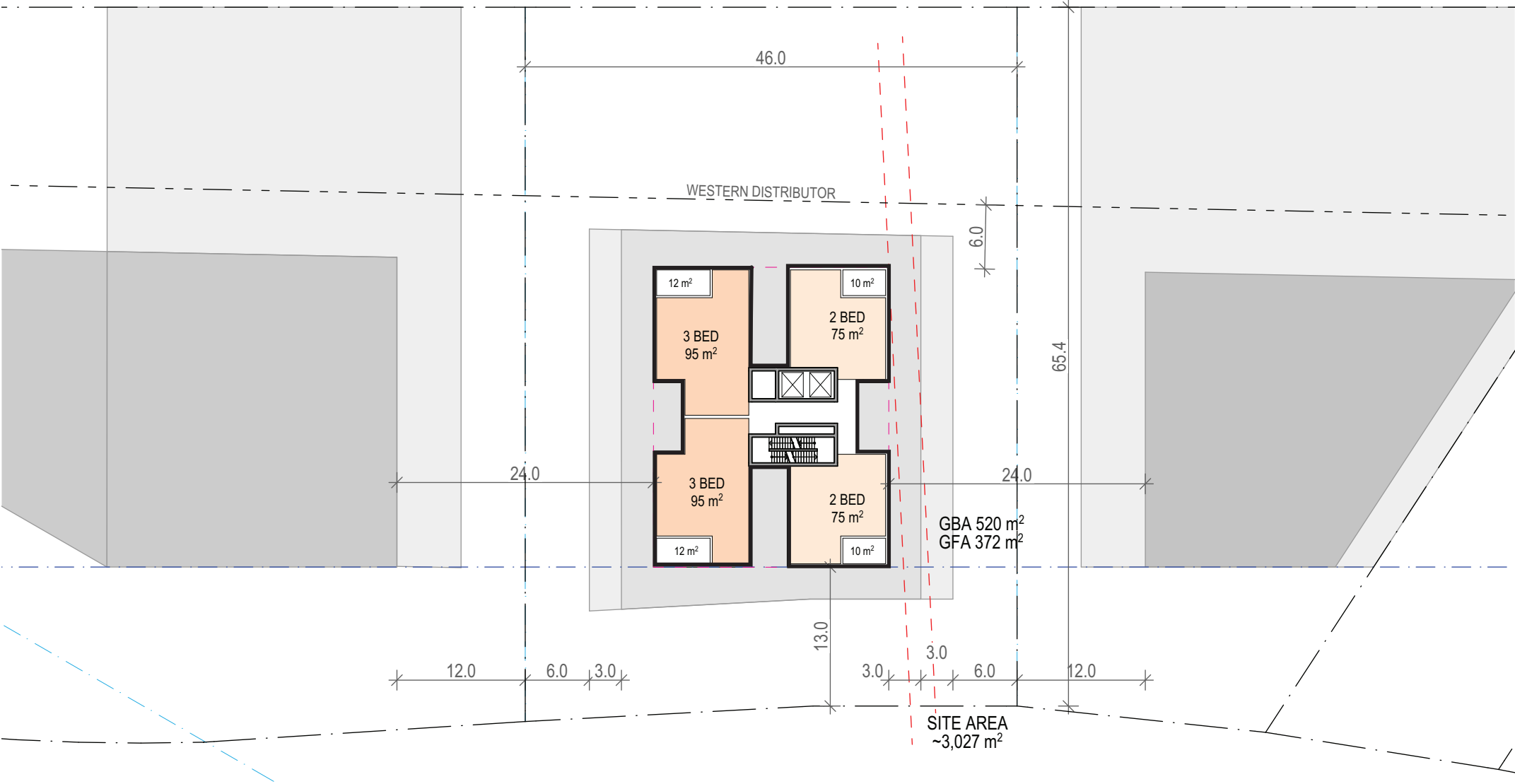
Built form Diagram (Planning Response Documents p16)



# 02

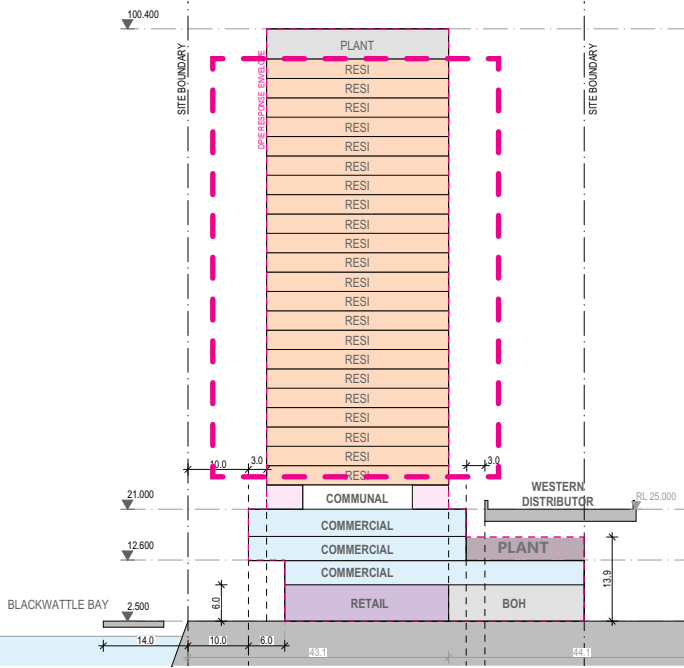
## PLANNING STUDY

DPIE Max. 520m2 FLOORPLATE REVIEW  
SETBACK & MAX FLOORPLATE COMPLIANCE



TOWER FLOORPLATE STUDY SUMMARY:

SITE AREA	2,971m2
TOTAL GBA	4,080m2
TOTAL GFA	~9,140m2 (DPIE 9,140m2)
TOTAL RESI	88 UNITS
FLOORPLATE GBA	520m2
FLOORPLATE GFA	372m2
FLOORPLATE NSA	340m2
GFA/GBA EFFICIENCY	71%
NLA/GFA	91%

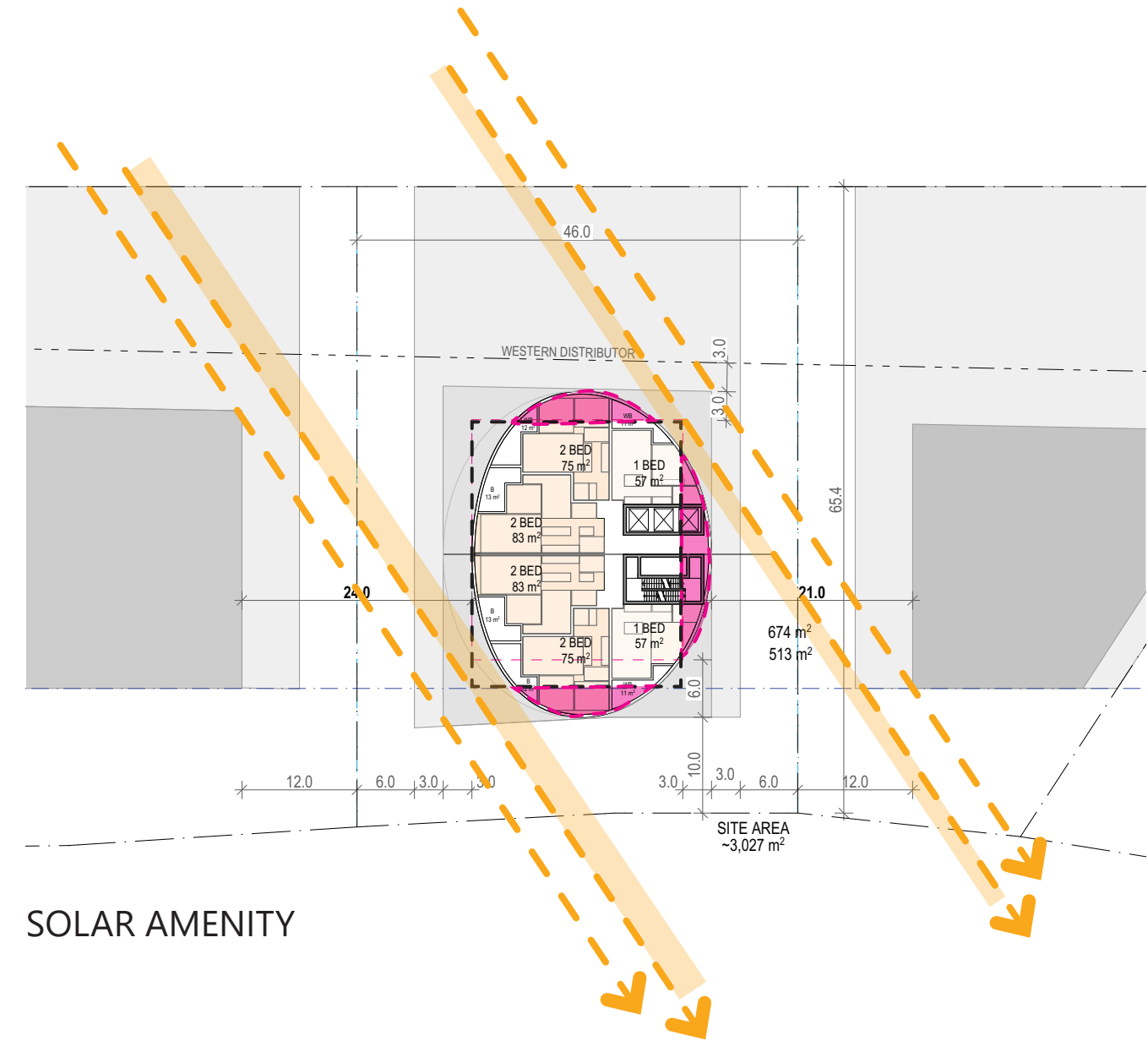


# 03

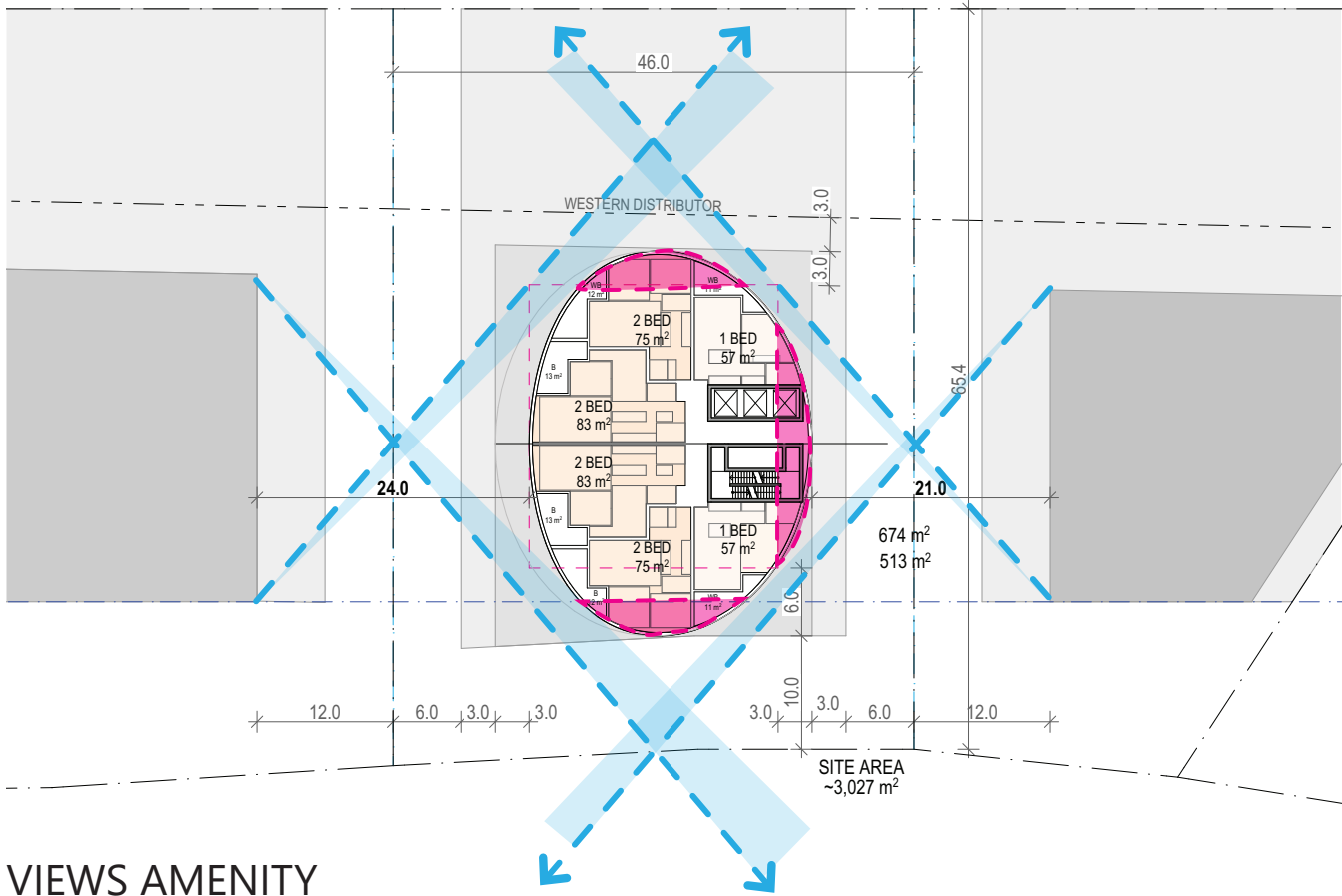
## PROPOSAL - OPTIMIZED FLOORPLATE

PROPOSAL

750M2 FLOORPLATE - AMENITIES



SOLAR AMENITY

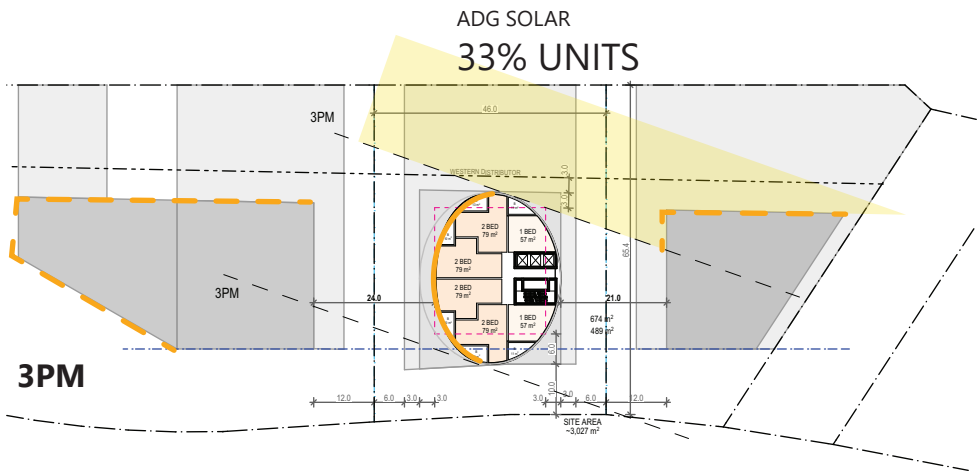
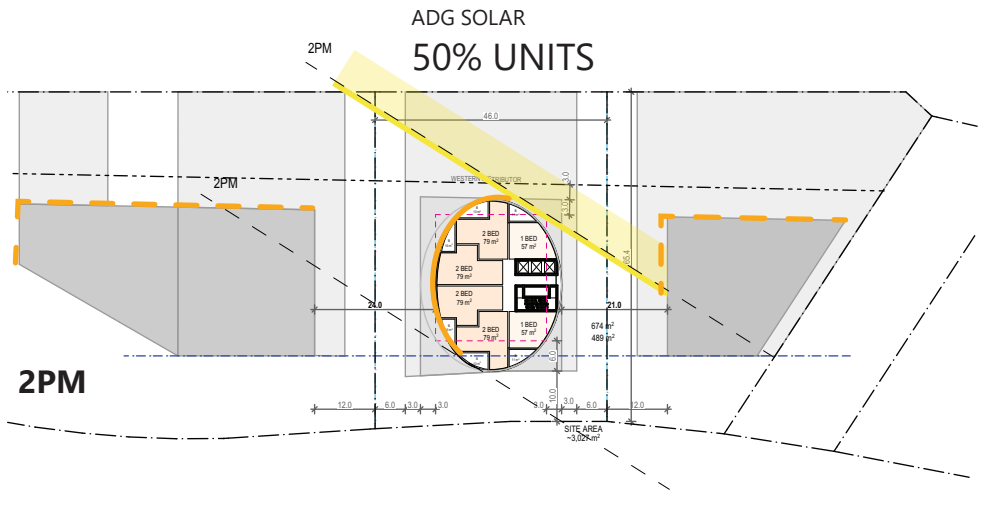
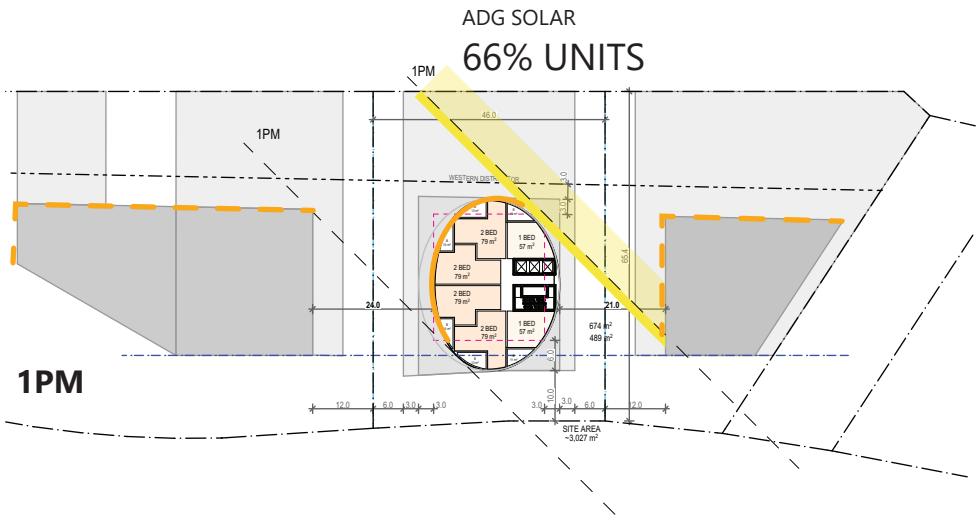
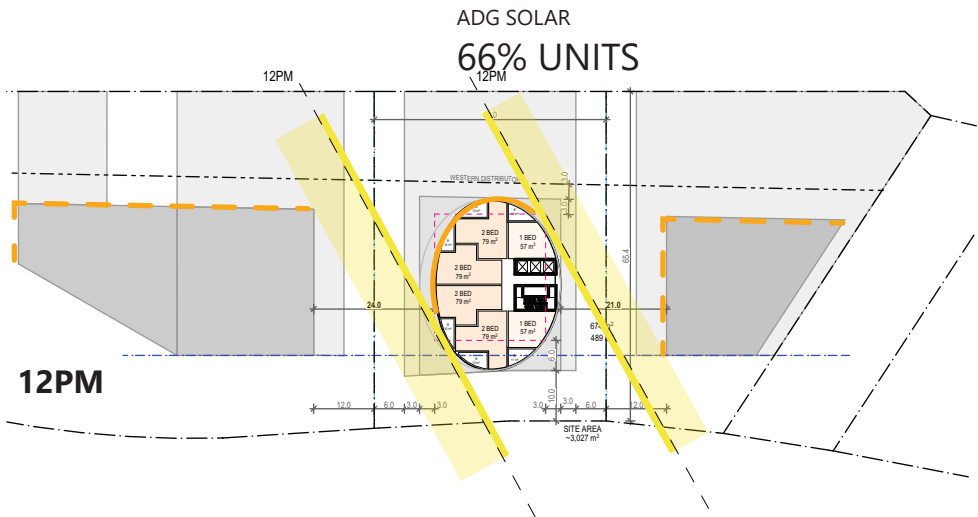
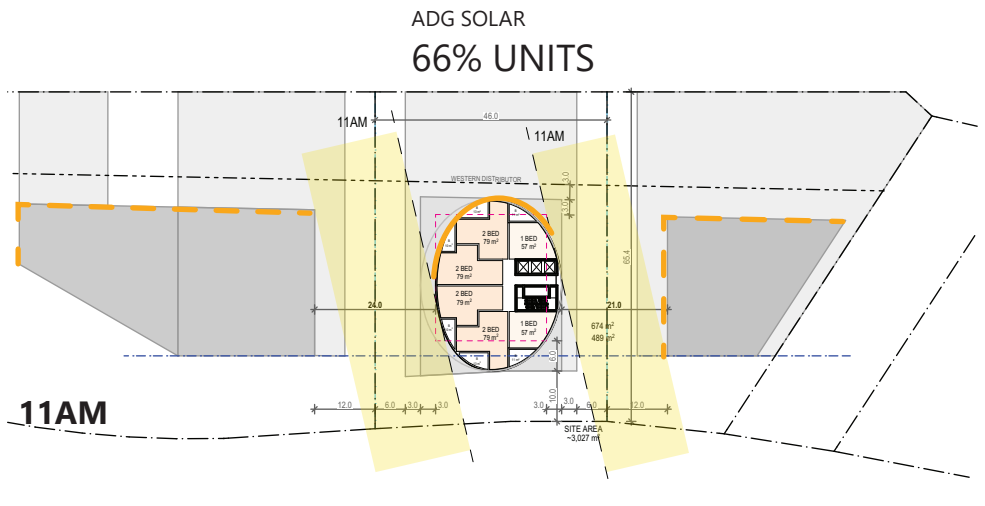
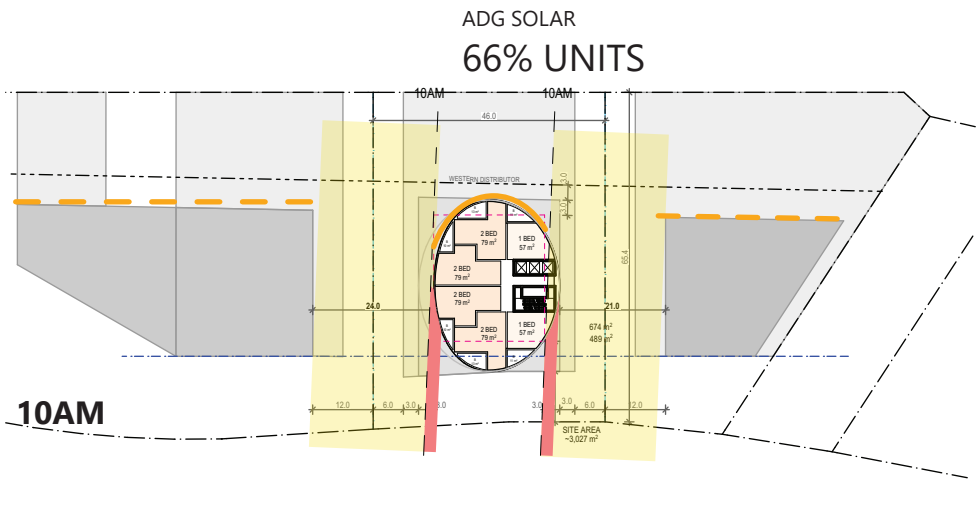
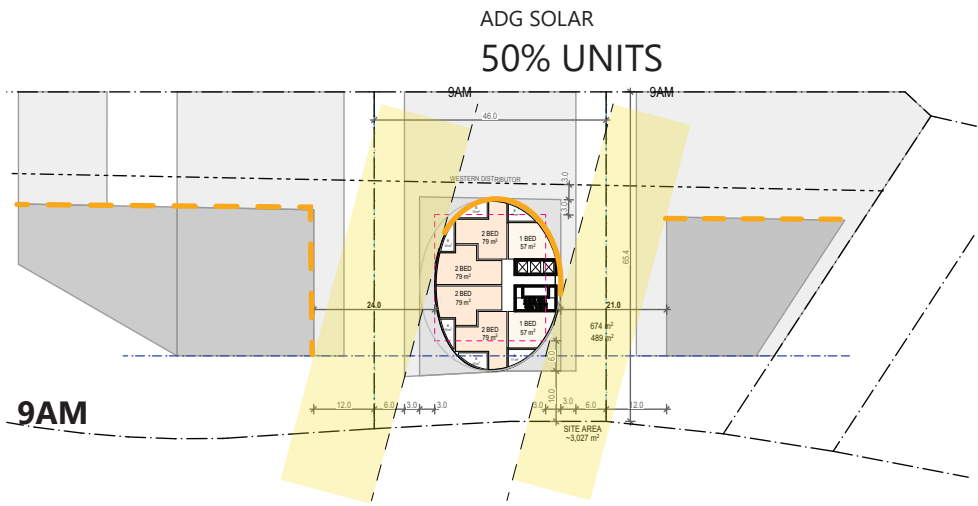


VIEWS AMENITY



PROPOSAL

# 680M2 FLOORPLATE - SOLAR AMENITIES STUDY



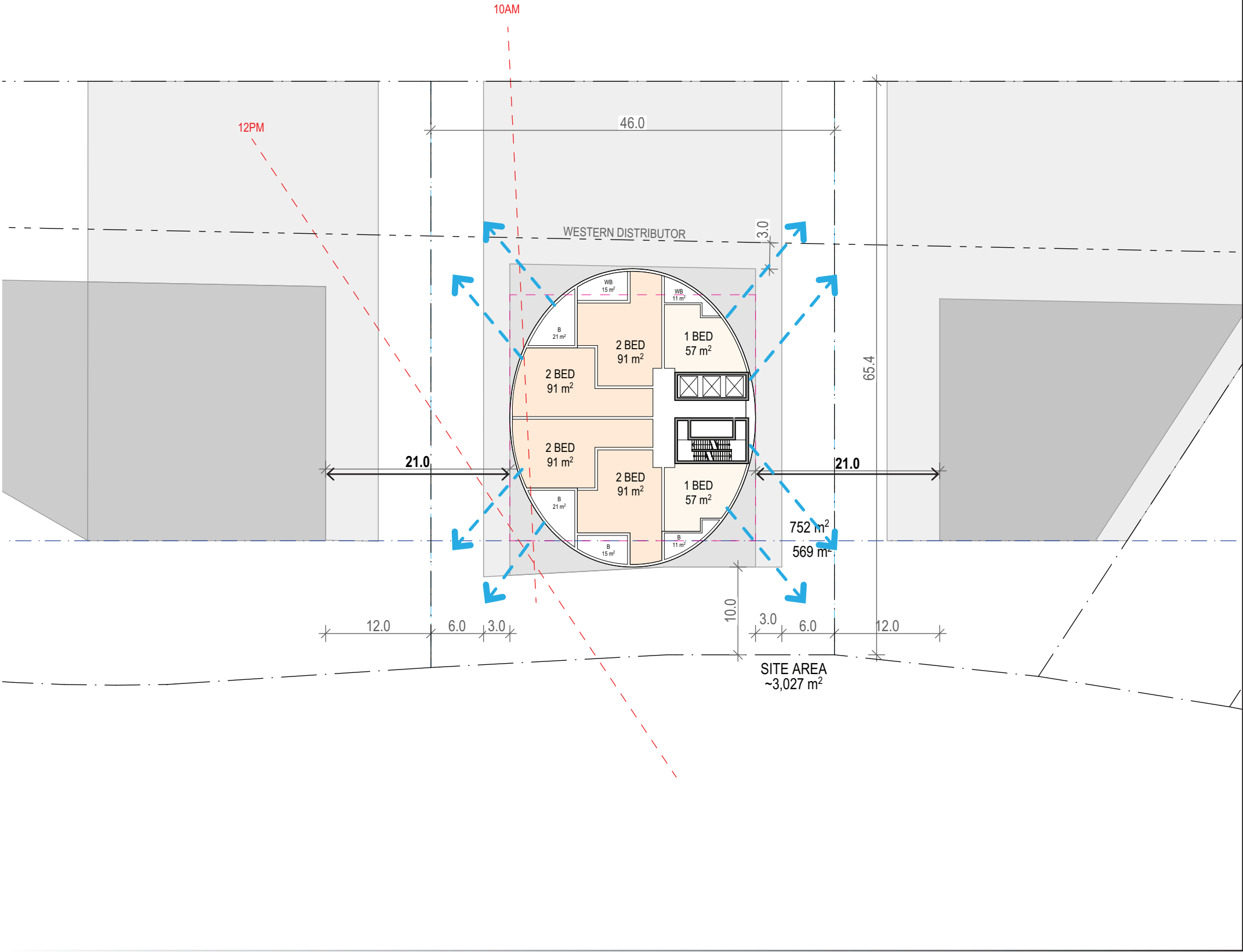
- DPIE SOLAR AMENITY
- BONUS SOLAR AMENITY
- LOSS OF SOLAR AMENITY



PROPOSAL

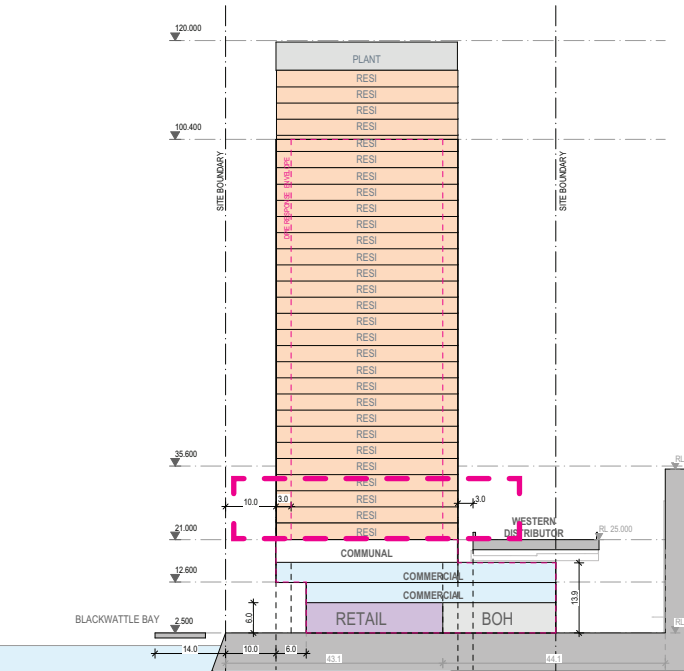
# 750M2 FLOORPLATE LOW

OPTIMIZED FLOORPLATE



TOWER FLOORPLATE STUDY SUMMARY:

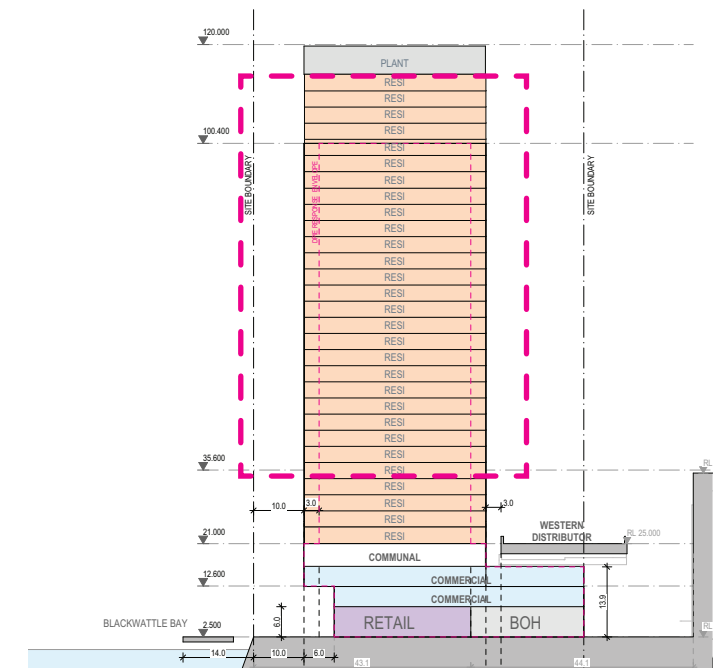
SITE AREA	2,971m2
TOTAL GBA	29,616m2
TOTAL GFA	~20,271m2 (DPIE 9,140m2)
TOTAL RESI	152 UNITS
FLOORPLATE GBA	750m2
FLOORPLATE GFA	570m2
FLOORPLATE NSA	480m2 (5-6 UNITS)
GFA/GBA EFFICIENCY	76%
NLA/GFA	84.5%





SITE AREA	2,971m2
TOTAL GBA	29,616m2
TOTAL GFA	~20,271m2 (DPIE 9,140m2)
TOTAL RESI	152 UNITS

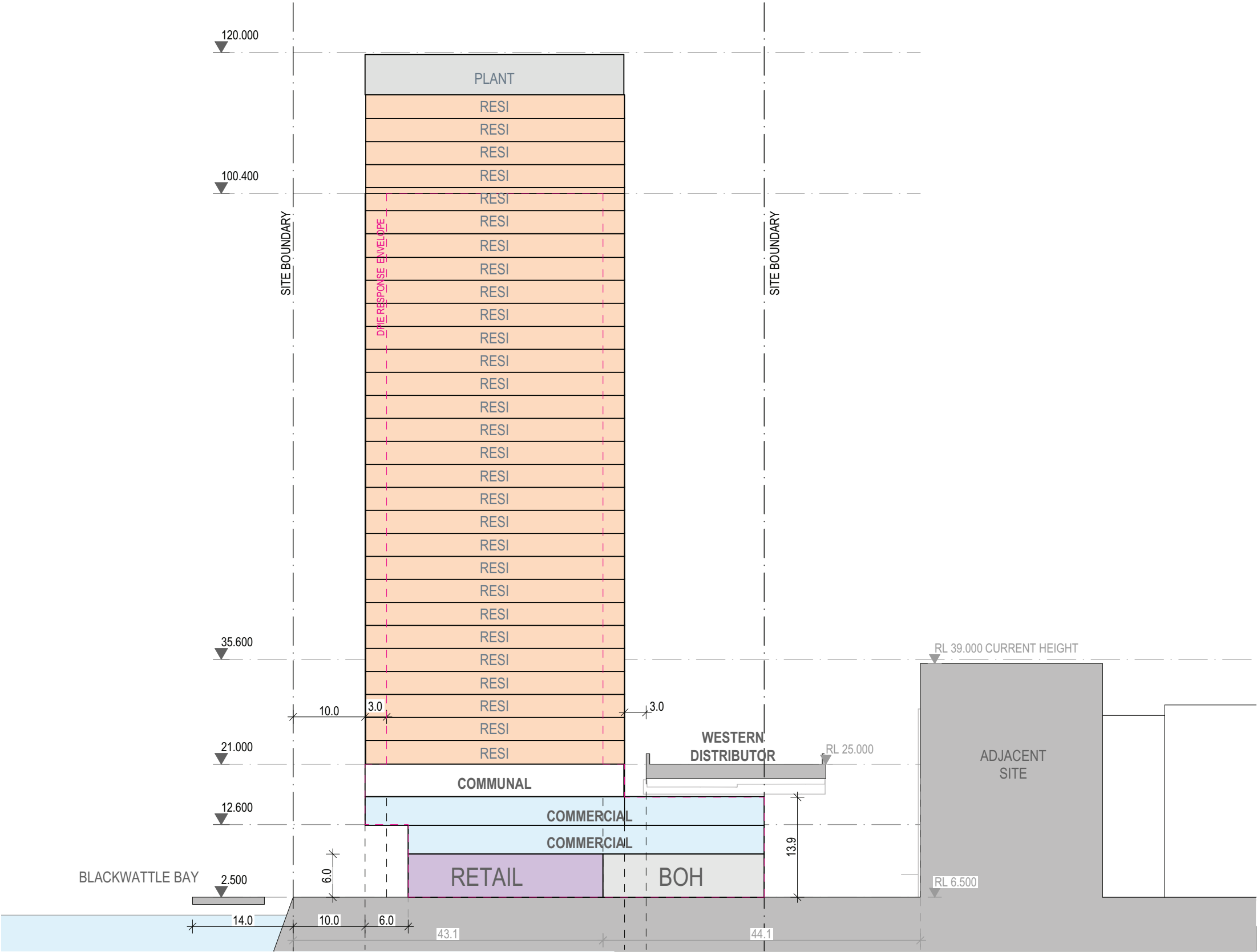
FLOORPLATE GBA	680m2
FLOORPLATE GFA	520m2
FLOORPLATE NSA	430m2 (5-6 UNITS)
GFA/GBA EFFICIENCY	76%
NLA/GFA	82.6%



PROPOSAL

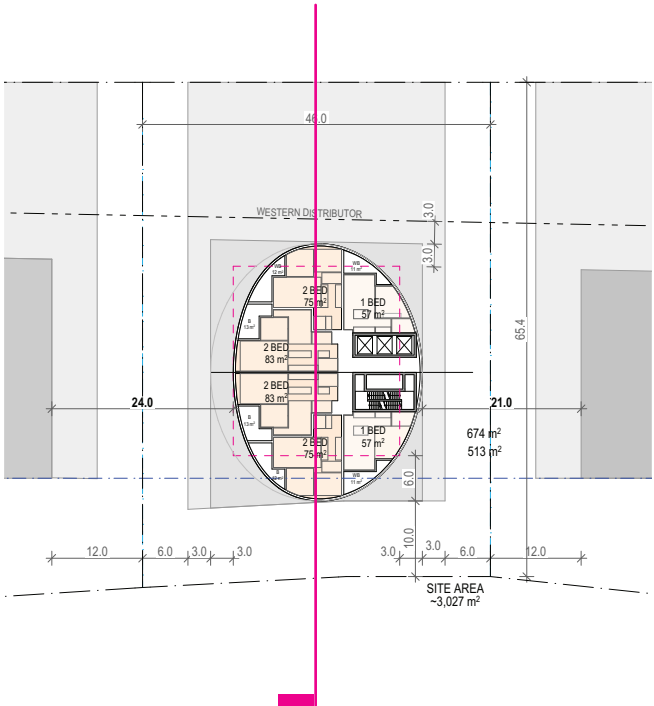
# 680M2 FLOORPLATE HIGH

RL 120 OPTIMIZED FLOORPLATE



PROPOSED DEVELOPMENT SUMMARY:

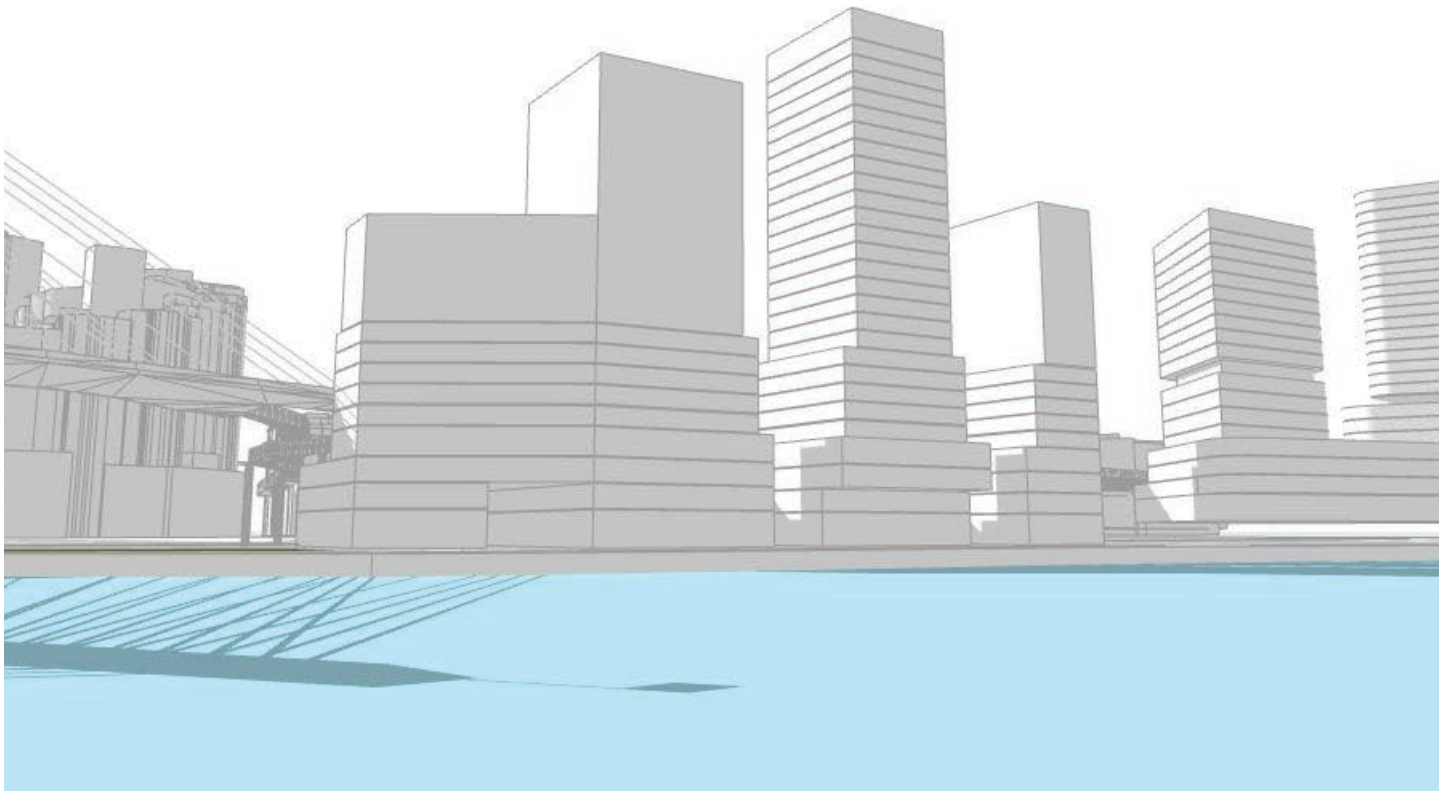
SITE SUMMARY		
SITE AREA		2,971m2
TOTAL GFA		~20,271m2 (DPIE 13,200m2)
FSR		6.82:1
Commerical		
OFFICE TOTAL GFA		3,100m2
RETAIL TOTAL GFA		940m2
Residential		
RESI TOTAL GFA		15,750m2
RESI UNITS		152 (5-6 per floor)
FLOORPLATE	GBA	680m2/750m2 (DPIE 520m2)
FLOORPLATE	GFA	520m2/570m2
FLOORPLATE RESI	NLA	~478m2
GFA/GBA EFFICIENCY		76%
NLA/GFA		84.6%



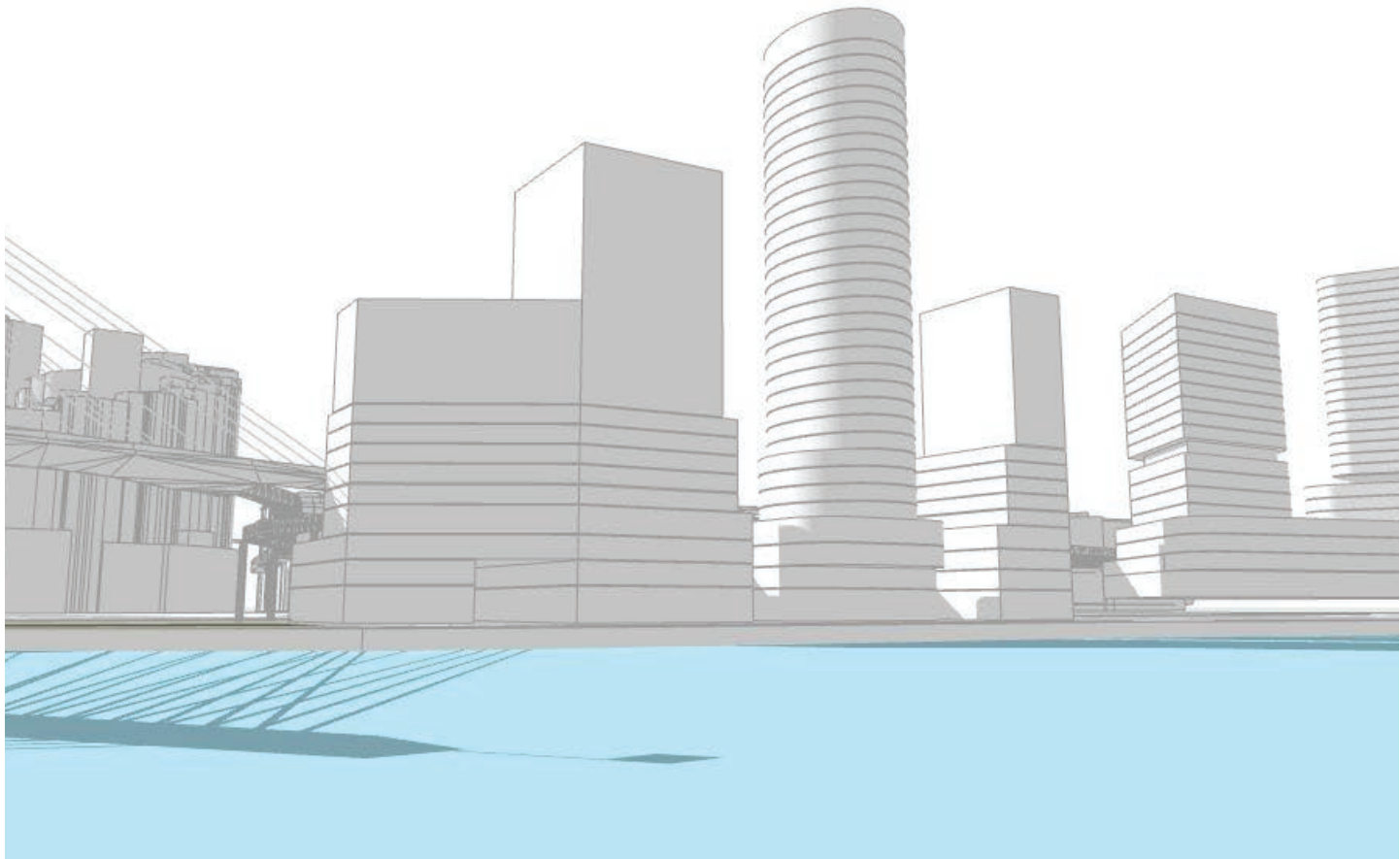


VIEW STUDIES

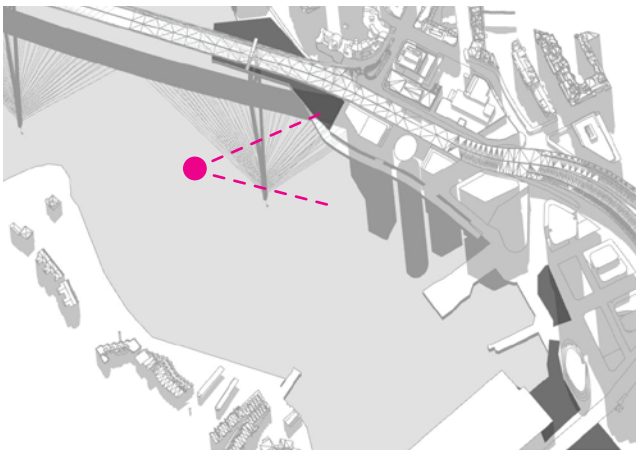
VIEW 1



DPIE CONTROL ENVELOPE



PROPOSAL - 680m2 FLOORPLATE



PLANNING STUDY

# RL120M - SCHEDULE

OPTION 10 FLOORPLATE

HEIGHT (m)	RL (m)	FTF (m)	LEVEL	G.B.A. (m <sup>2</sup> )	G.F.A. (m <sup>2</sup> )	GFA / GBA Efficiency	NO. OF APT	APRTMENT TYPE			SEPP 65 COMPLIANCE	
								1 BED	2 BED	3 BED	SOLAR	CROSS VENT.
120300	122800											
118300	120800	2000	OVER-RUN									
115100	117600	3200	PLANT									
111900	114400	3200	L33	680	520	76.5%	3			3	3	
108700	111200	3200	L32	680	520	76.5%	3			3	3	
105500	108000	3200	L31	680	520	76.5%	3			3	3	
102300	104800	3200	L30	680	520	76.5%	3			3	3	
99100	101600	3200	L29	680	520	76.5%	4		2	2	3	
95900	98400	3200	L28	680	520	76.5%	4		2	2	3	
92700	95200	3200	L27	680	520	76.5%	4		2	2	3	
89500	92000	3200	L26	680	520	76.5%	4		2	2	3	
86300	88800	3200	L25	680	520	76.5%	4		2	2	3	
83100	85600	3200	L24	680	520	76.5%	4		2	2	3	
79900	82400	3200	L23	680	520	76.5%	4		2	2	3	
76700	79200	3200	L22	680	520	76.5%	4		2	2	3	
73500	76000	3200	L21	680	520	76.5%	6	2	4		4	
70300	72800	3200	L20	680	520	76.5%	6	2	4		4	
67100	69600	3200	L19	680	520	76.5%	6	2	4		4	
63900	66400	3200	L18	680	520	76.5%	6	2	4		4	
60700	63200	3200	L17	680	520	76.5%	6	2	4		4	
57500	60000	3200	L16	680	520	76.5%	6	2	4		4	
54300	56800	3200	L15	680	520	76.5%	6	2	4		4	
51100	53600	3200	L14	680	520	76.5%	6	2	4		4	
47900	50400	3200	L13	680	520	76.5%	6	2	4		4	
44700	47200	3200	L12	680	520	76.5%	6	2	4		4	
41500	44000	3200	L11	680	520	76.5%	6	2	4		4	
38300	40800	3200	L10	680	520	76.5%	6	2	4		4	
35100	37600	3200	L9	680	520	76.5%	6	2	4		4	
31900	34400	3200	L8	680	520	76.5%	6	2	4		4	
28700	31200	3200	L7	680	520	76.5%	6	2	4		4	
25500	28000	3200	L6	750	570	76.0%	6	2	4		4	
22300	24800	3200	L5	750	570	76.0%	6	2	4		3	
18500	21000	3800	L4	750	570	76.0%	6	2	4		3	
14000	16500	4500	L3	750	500	66.7%	0					
10000	12500	4000	L2	1895	1400	73.9%	0					
6000	8500	4000	L1	1781	1681	94.4%	0					
0	2500	6000	G	1680	940	56.0%	0					
-3000	-500	3000	B1	2900								
-6000	-3500	3000	B2									
-9000	-6500	3000	B3									
TOTALS				29616	20271	75.9%	152	36	88	28	106	0

% ACHIEVED	100%	24%	58%	18%	70%	0%
TARGETS	113	15%	70%	15%	70%	60%

SITE AREA (approx.)	2971	m <sup>2</sup>
TOTAL GFA ACHIEVED	20271	m <sup>2</sup>
TOTAL FSR ACHIEVED	6.82	:1
No. of Apt. ACHIEVED	152	



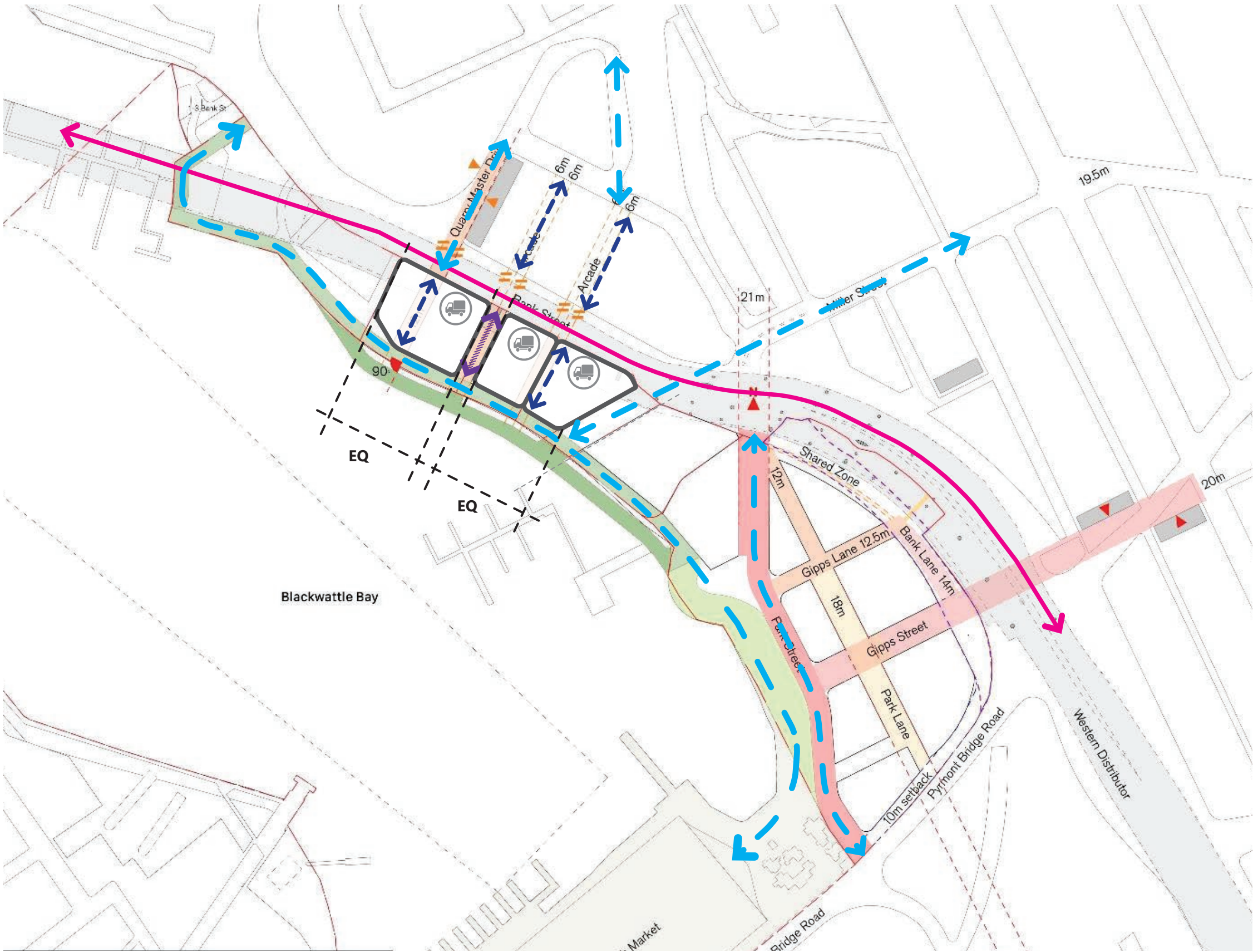
# 04

## PROPOSAL - PUBLIC DOMAIN



PLANNING STUDY

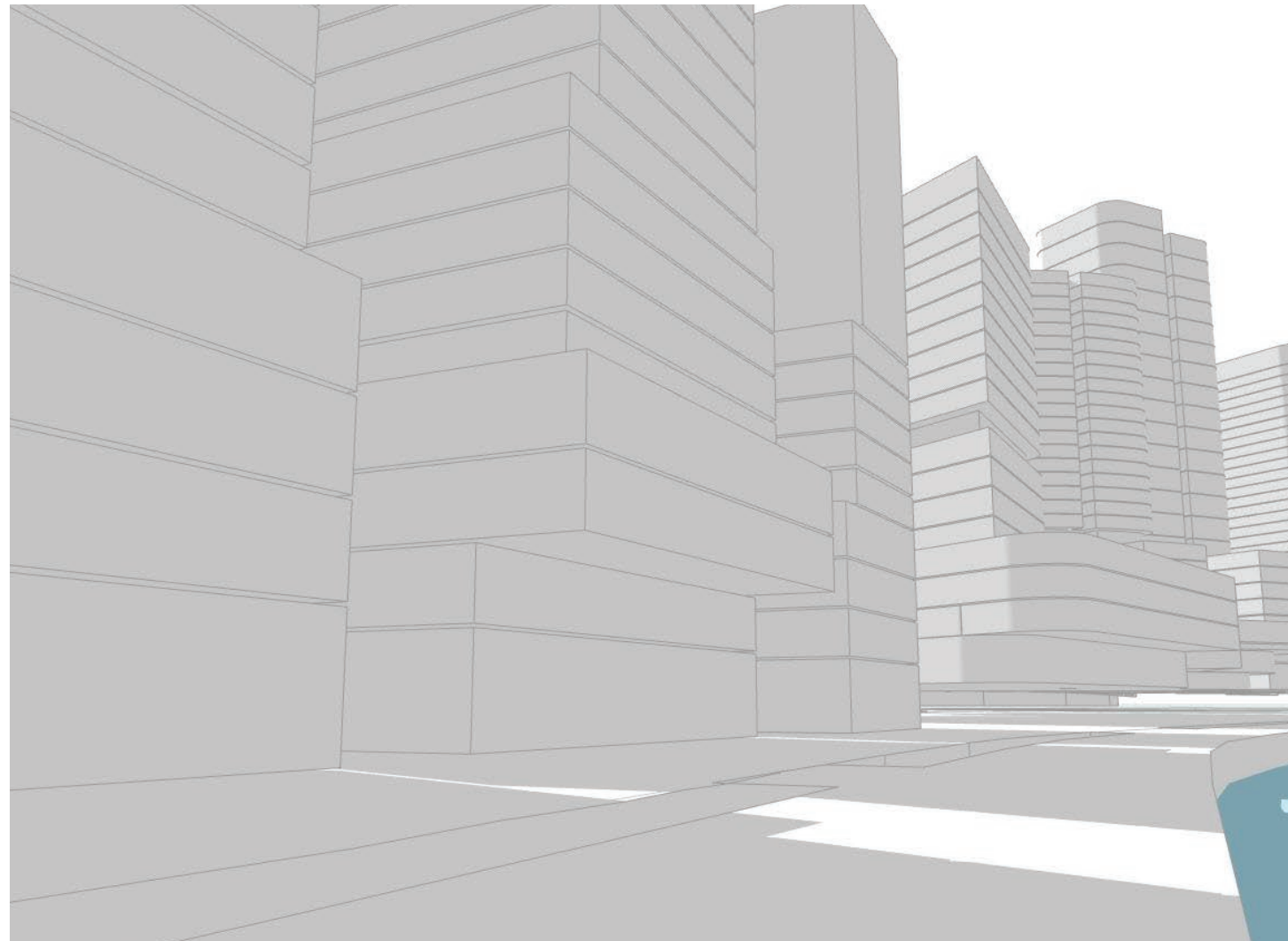
# URBAN STUDY - PROPOSED



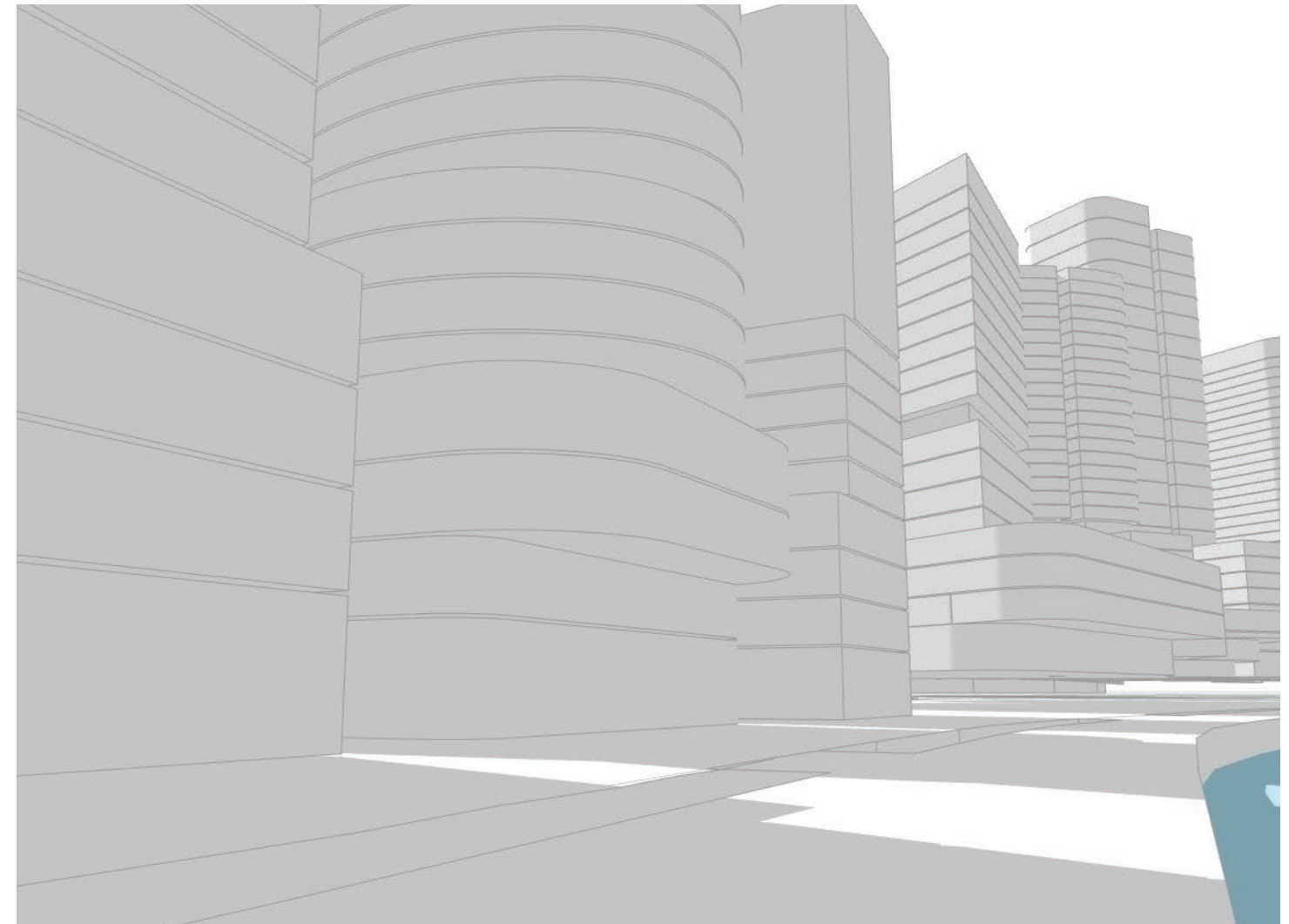
- ↔ VEHICLE
- ↔ PEDESTRIAN - WALKWAY
- ↔ PEDESTRIAN - ARCADE
- ↔ PEDESTRIAN - LANEWAYS
- 🚚 SERVICE/LOADING



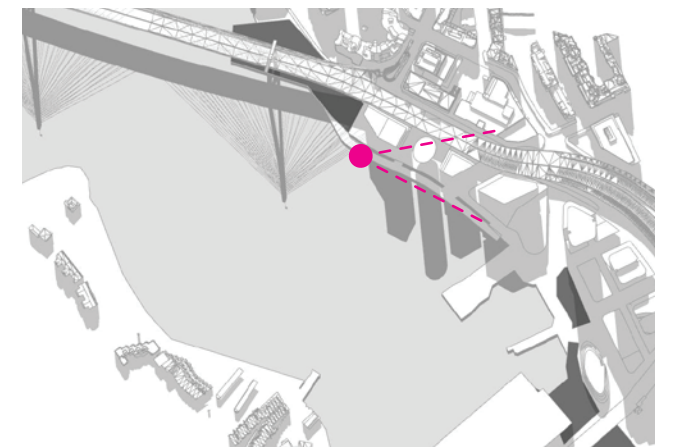
# SOLAR AMENITY - VIEW1 FROM PROMENADE SEPT 9AM



**DPIE CONTROL ENVELOPE**

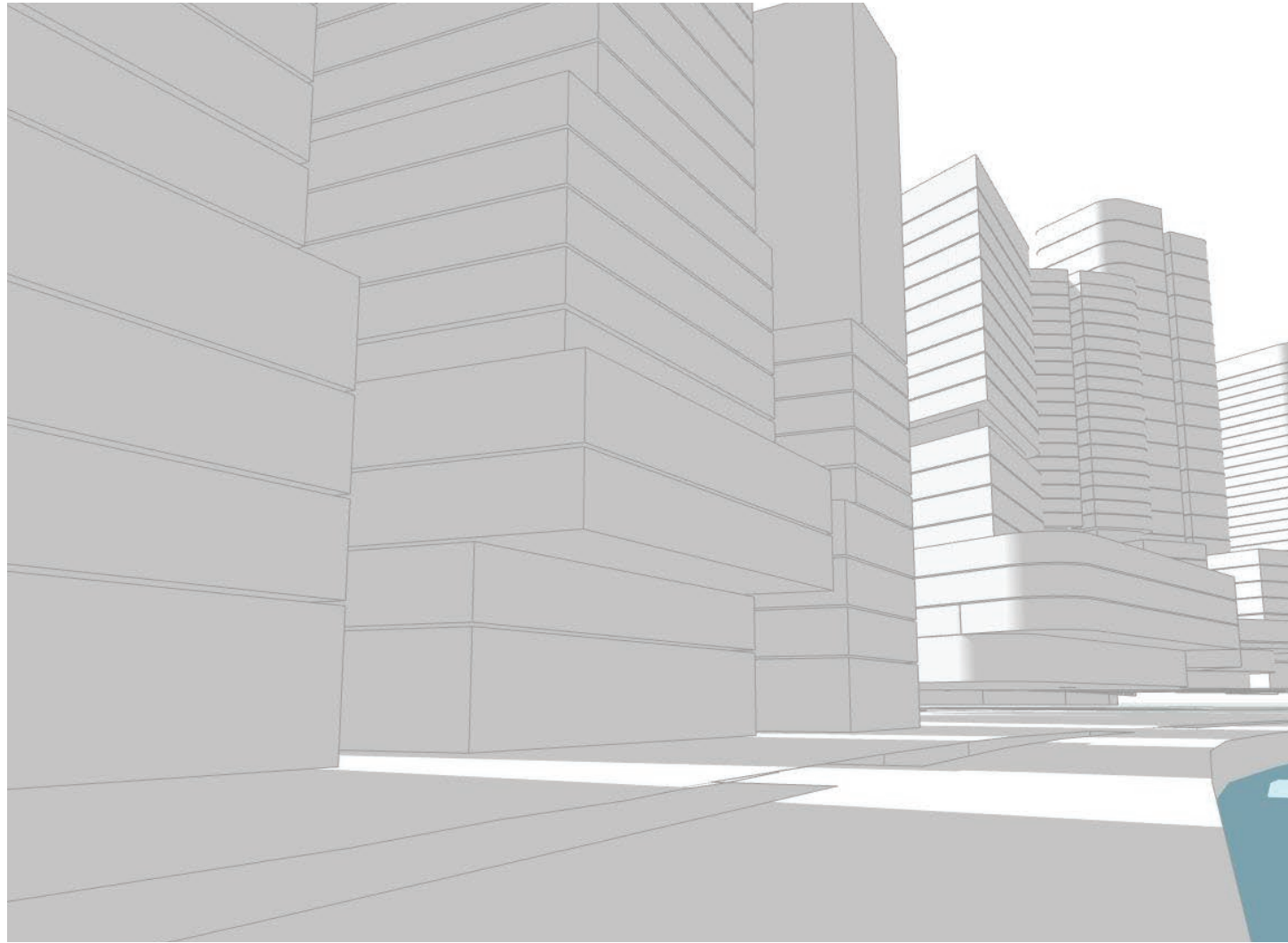


**PROPOSED 680m2 FLOORPLATE**

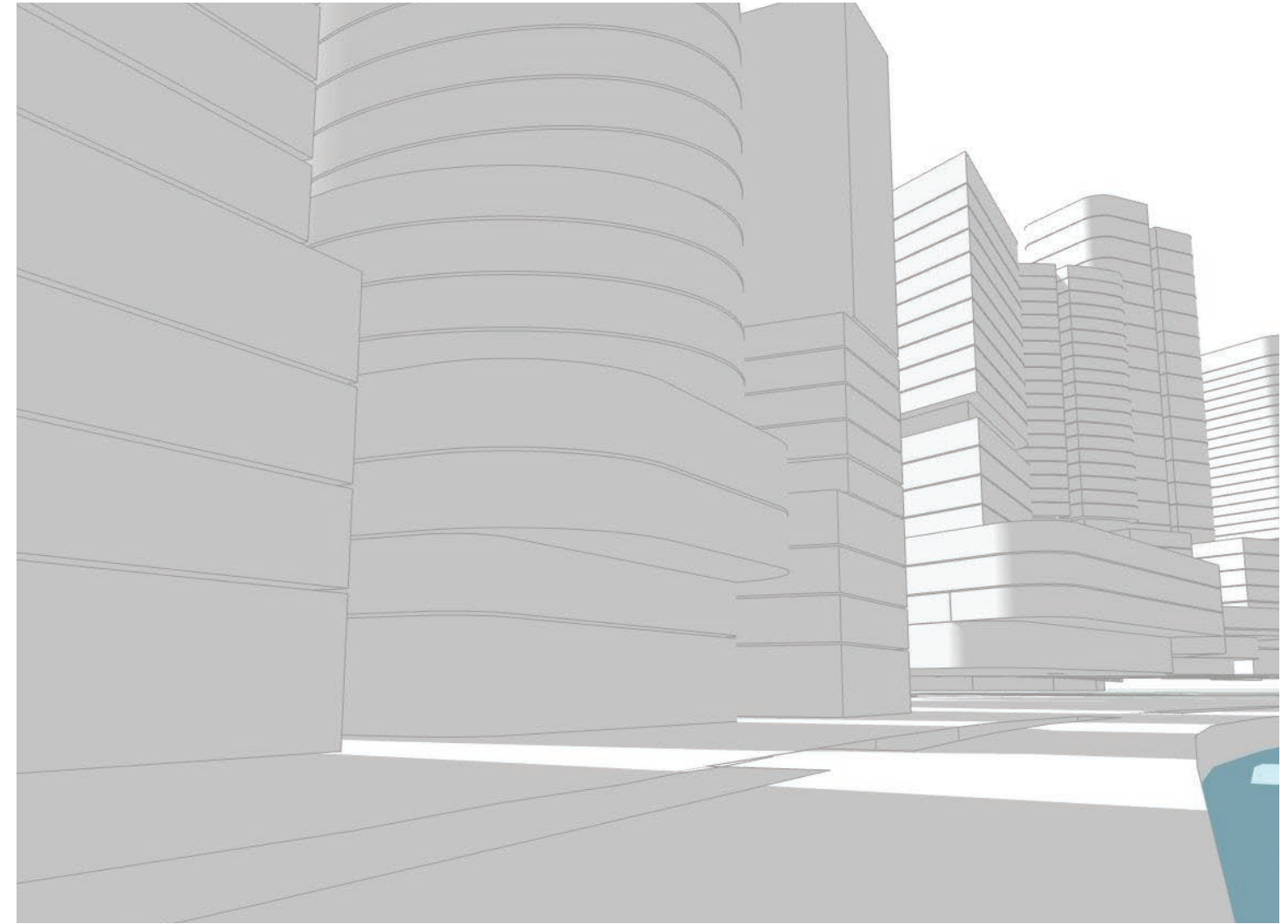




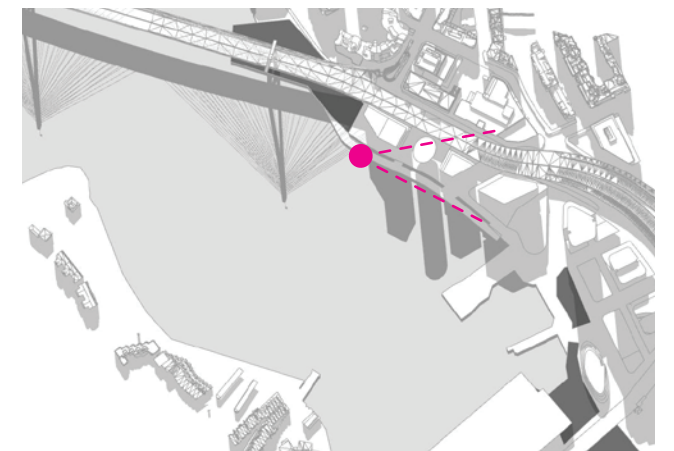
# SOLAR AMENITY - VIEW1 FROM PROMENADE SEPT 10AM



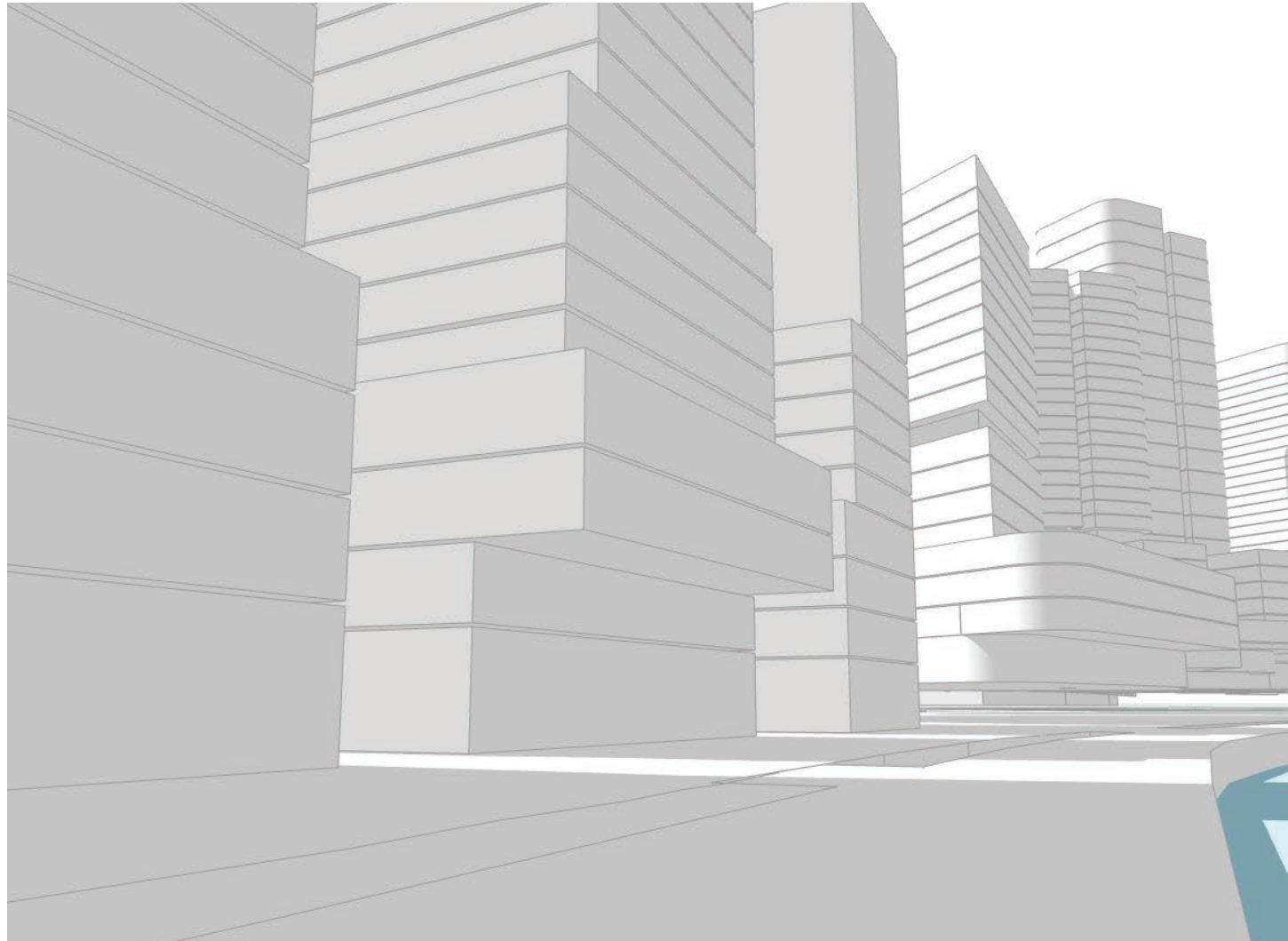
**DPIE CONTROL ENVELOPE**



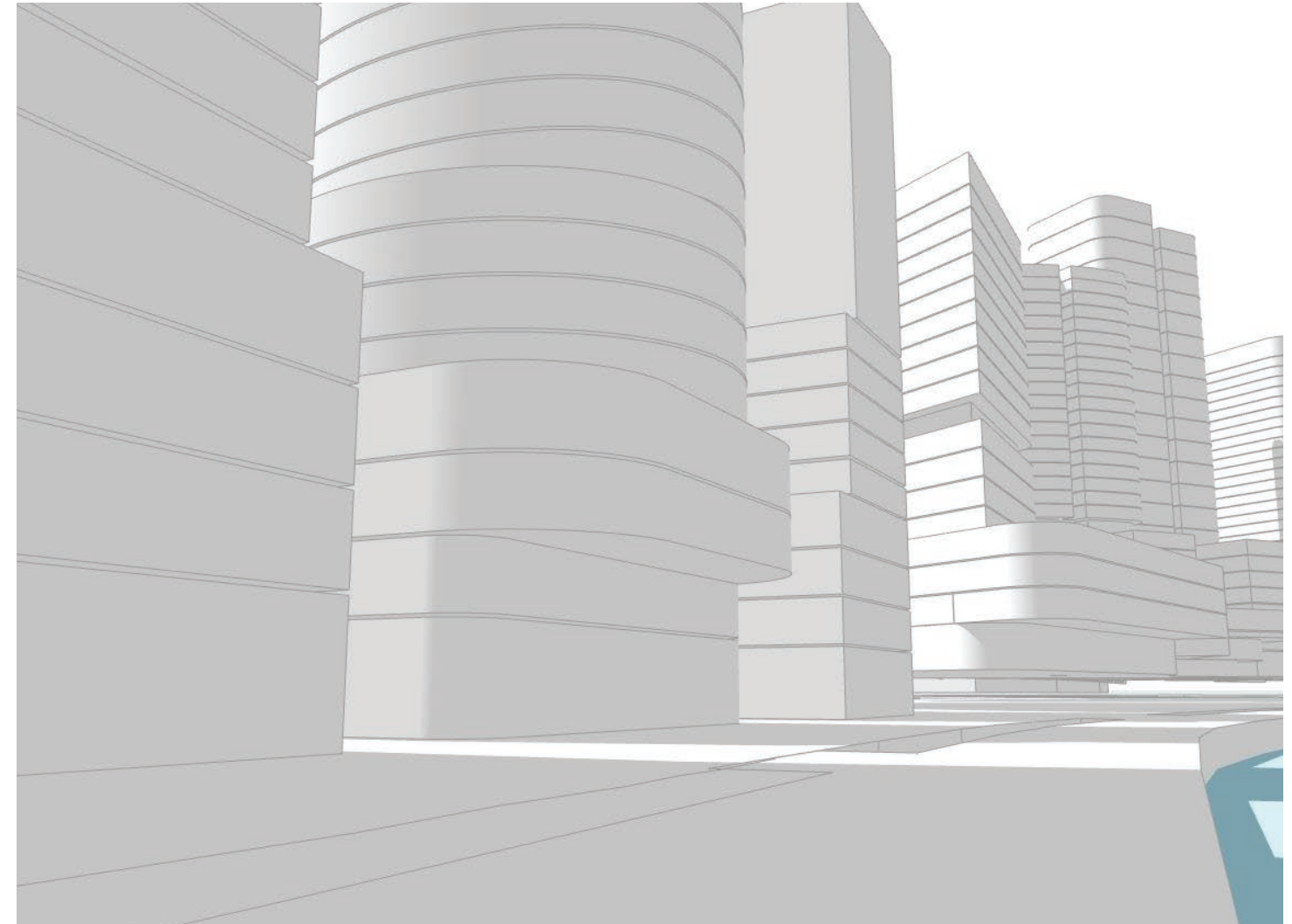
**PROPOSED 680m2 FLOORPLATE**



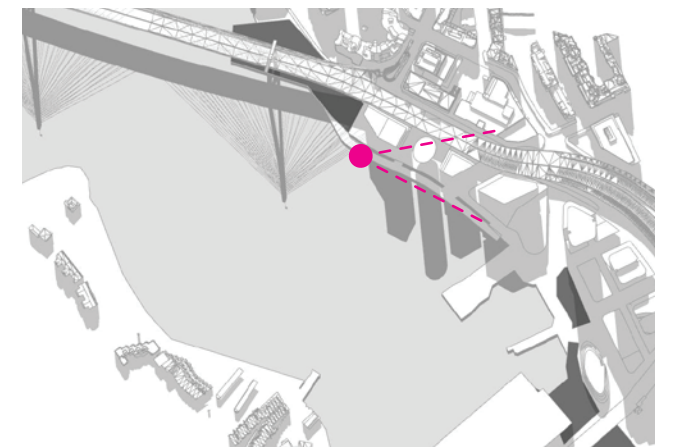
# SOLAR AMENITY - VIEW1 FROM PROMENADE SEPT 11AM



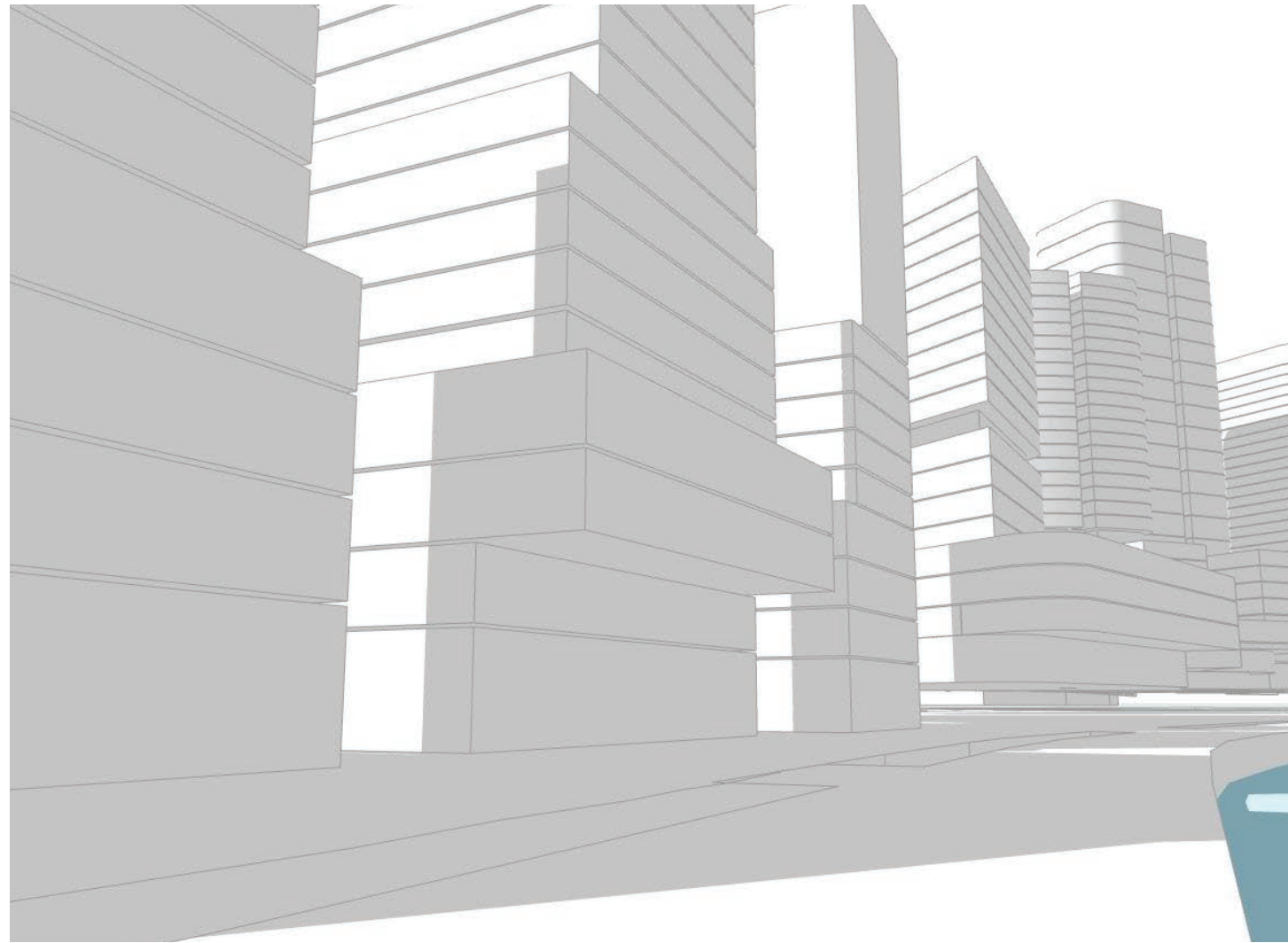
**DPIE CONTROL ENVELOPE**



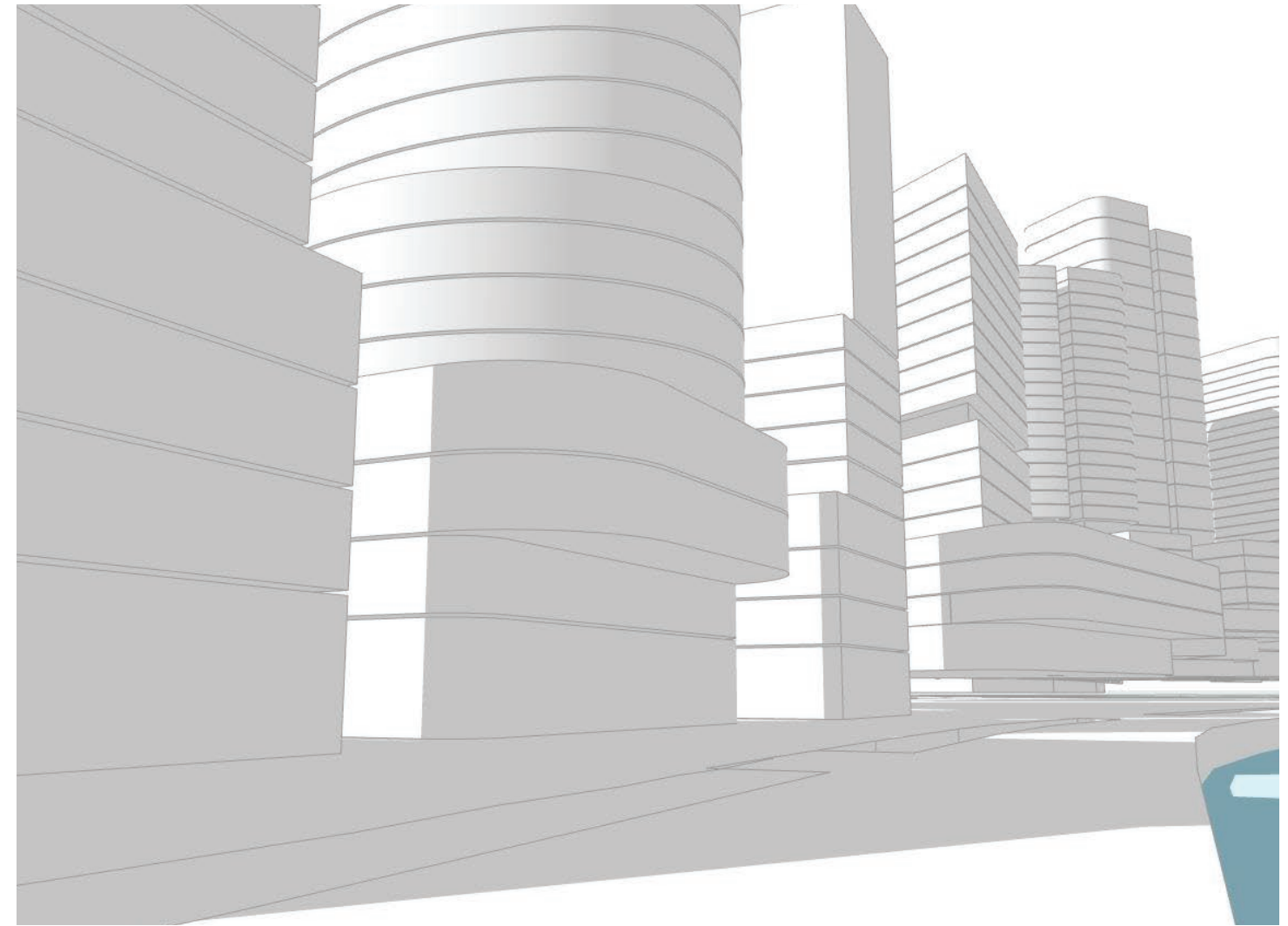
**PROPOSED 680m2 FLOORPLATE**



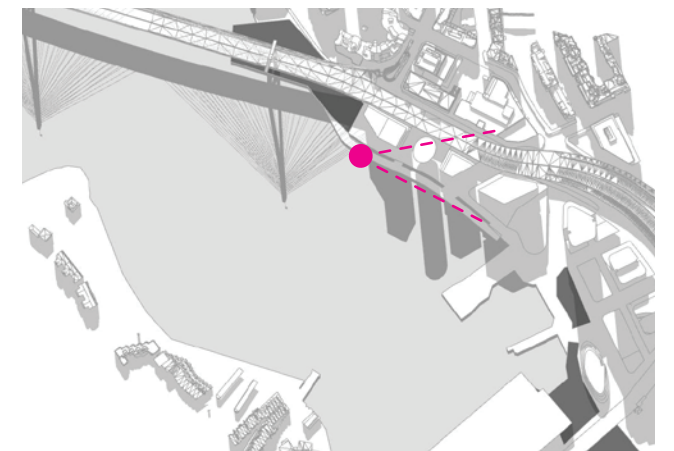
# SOLAR AMENITY - VIEW1 FROM PROMENADE SEPT 12PM



**DPIE CONTROL ENVELOPE**

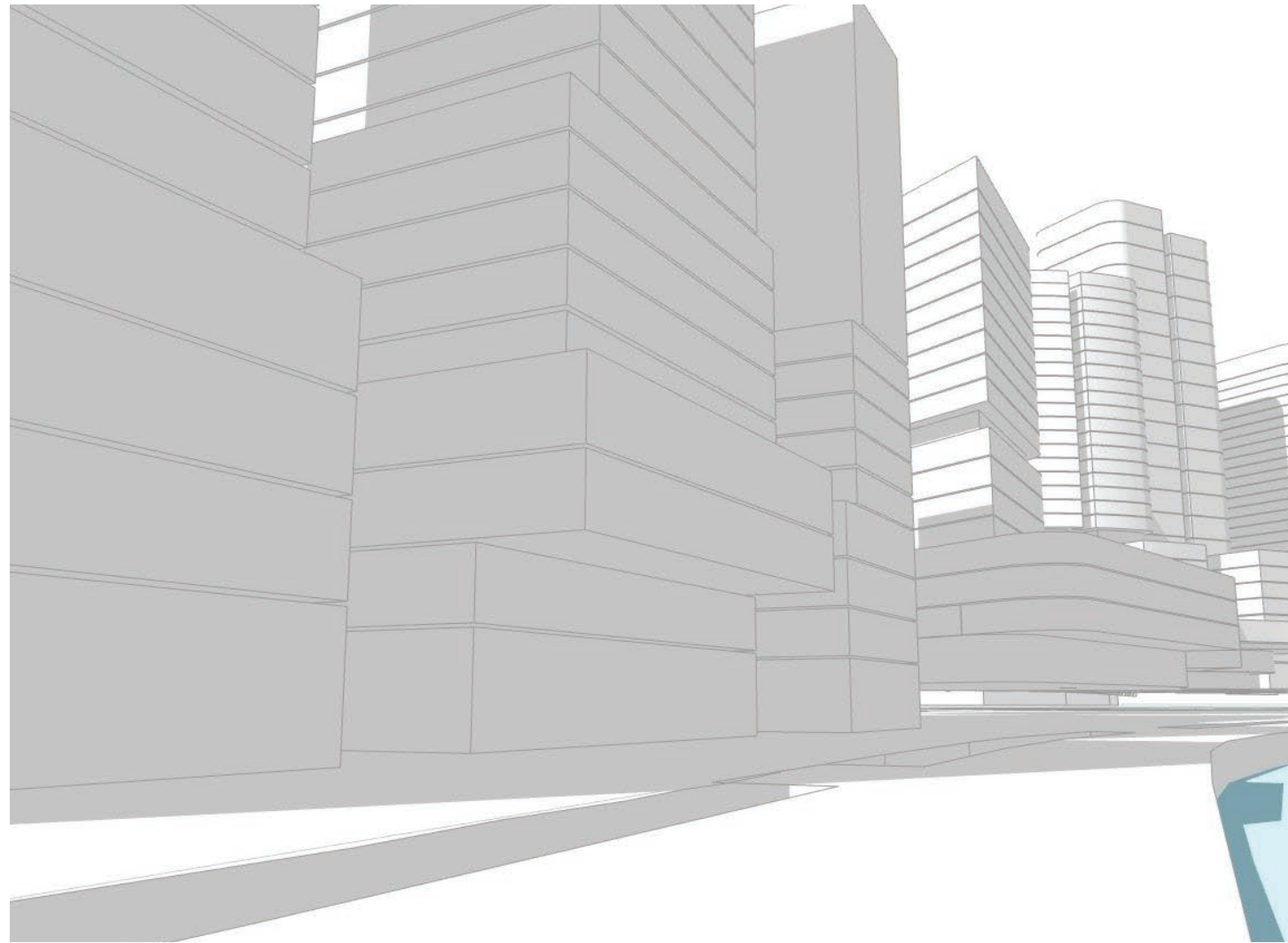


**PROPOSED 680m2 FLOORPLATE**

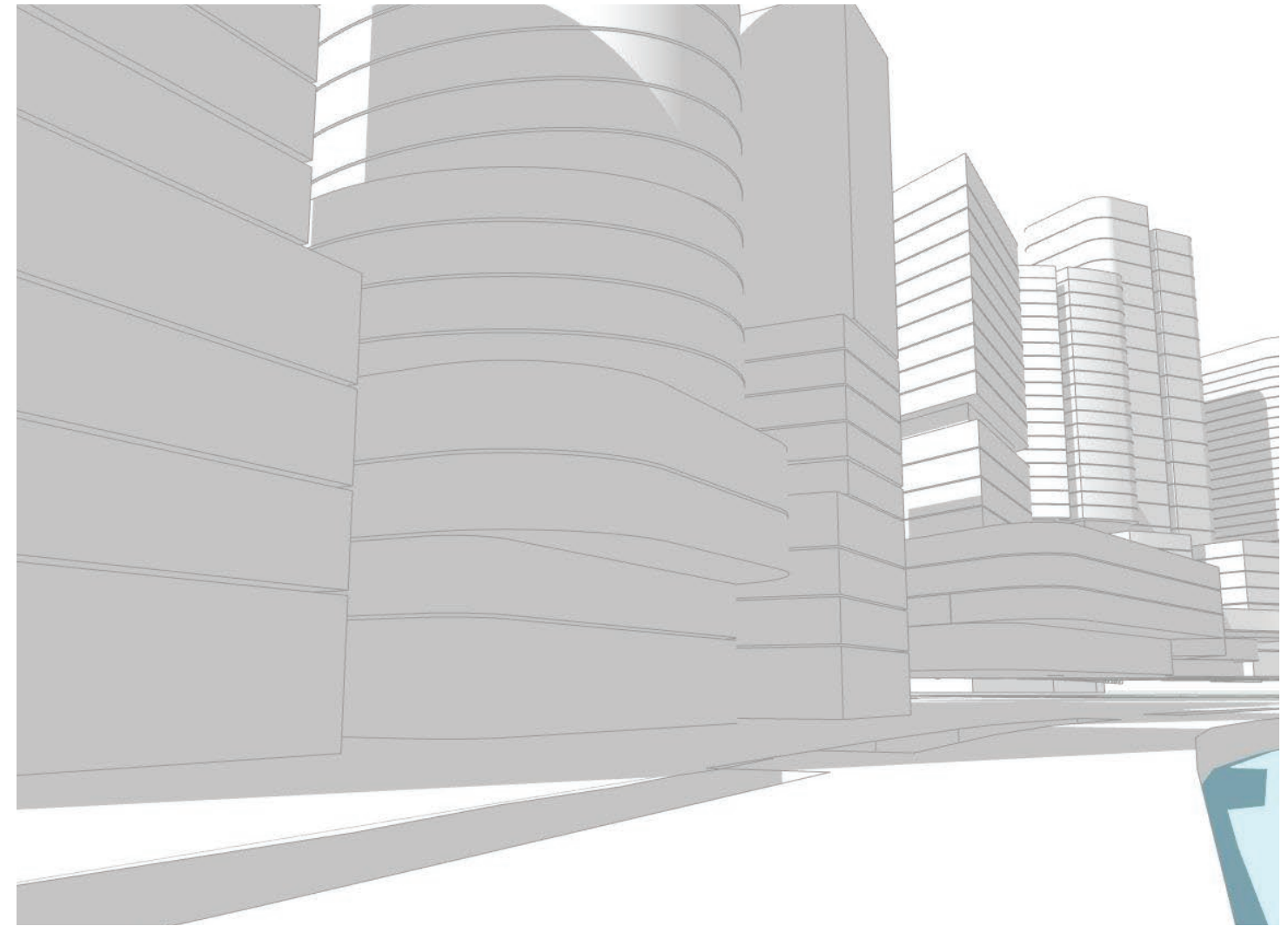




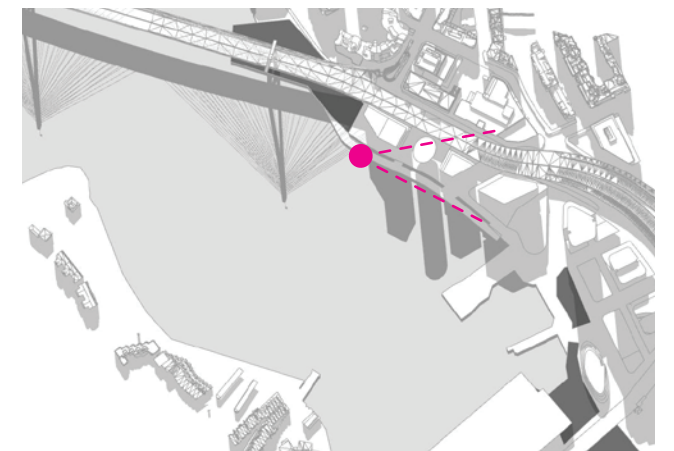
# SOLAR AMENITY - VIEW1 FROM PROMENADE SEPT 1PM



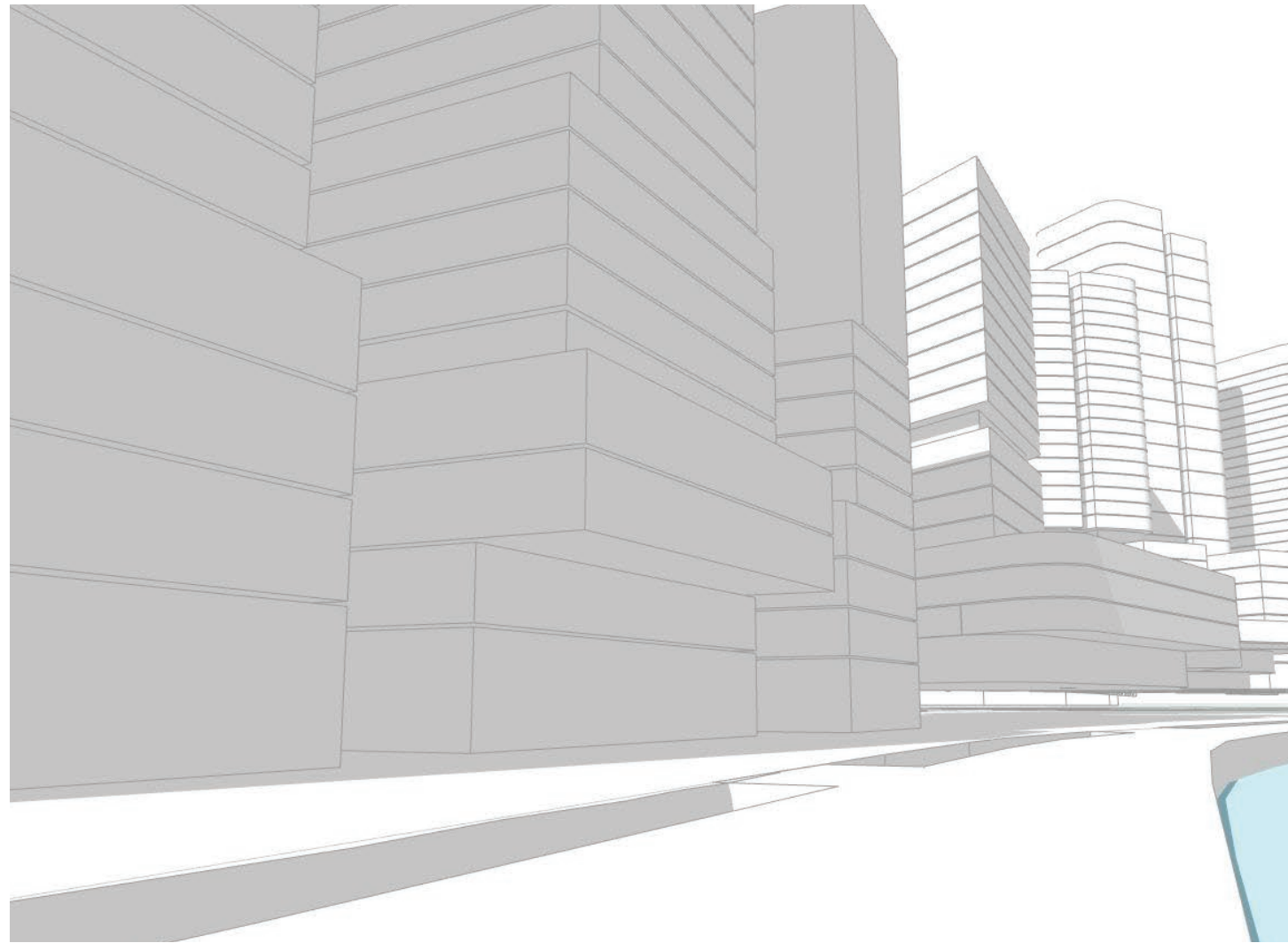
**DPIE CONTROL ENVELOPE**



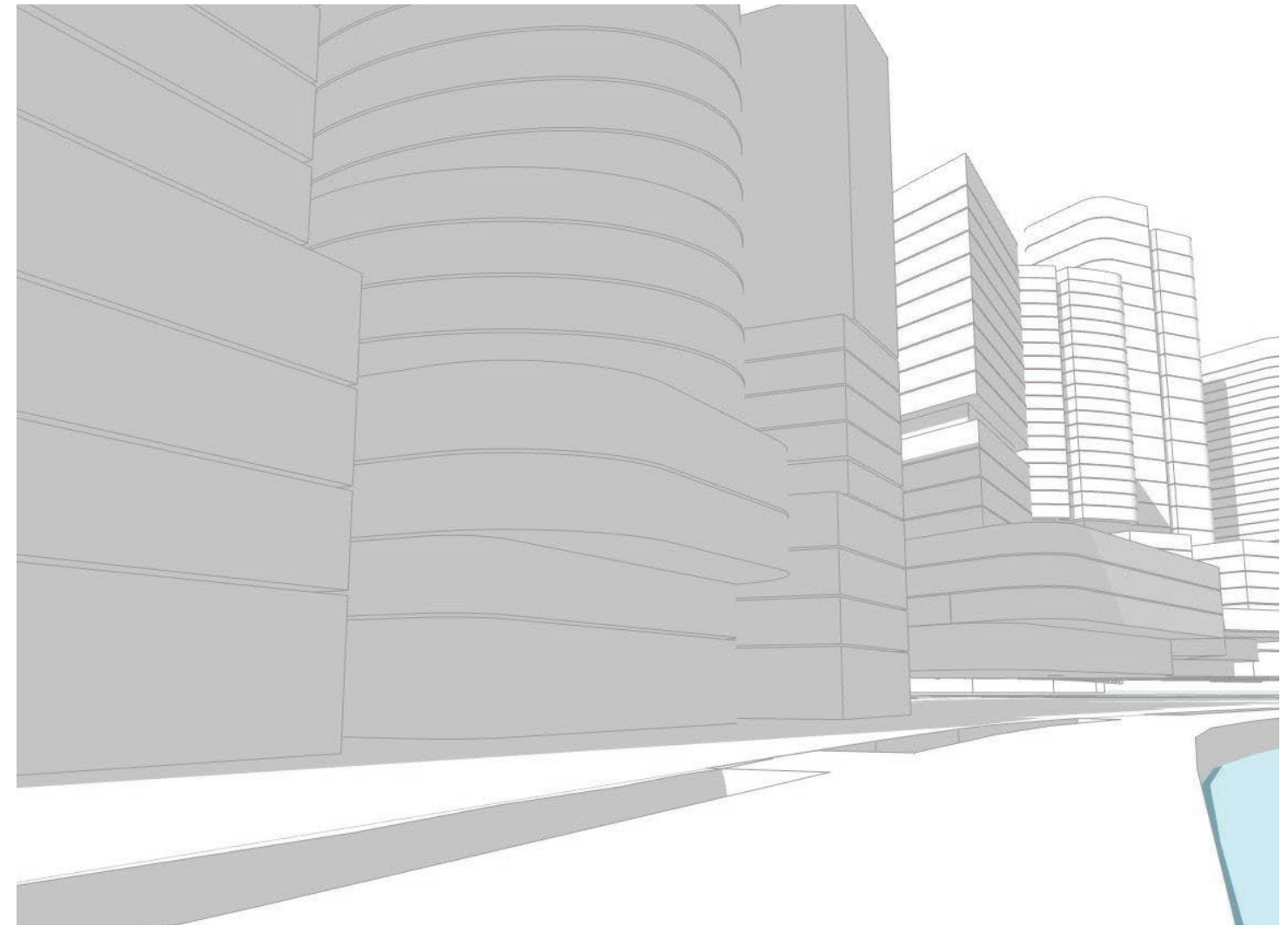
**PROPOSED 680m2 FLOORPLATE**



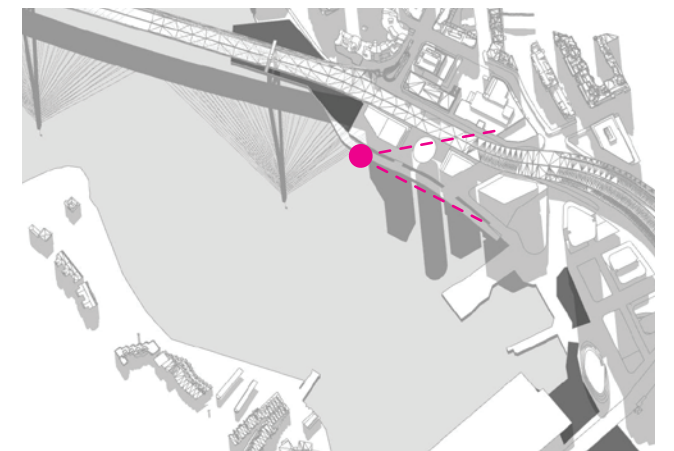
# SOLAR AMENITY - VIEW1 FROM PROMENADE SEPT 1PM



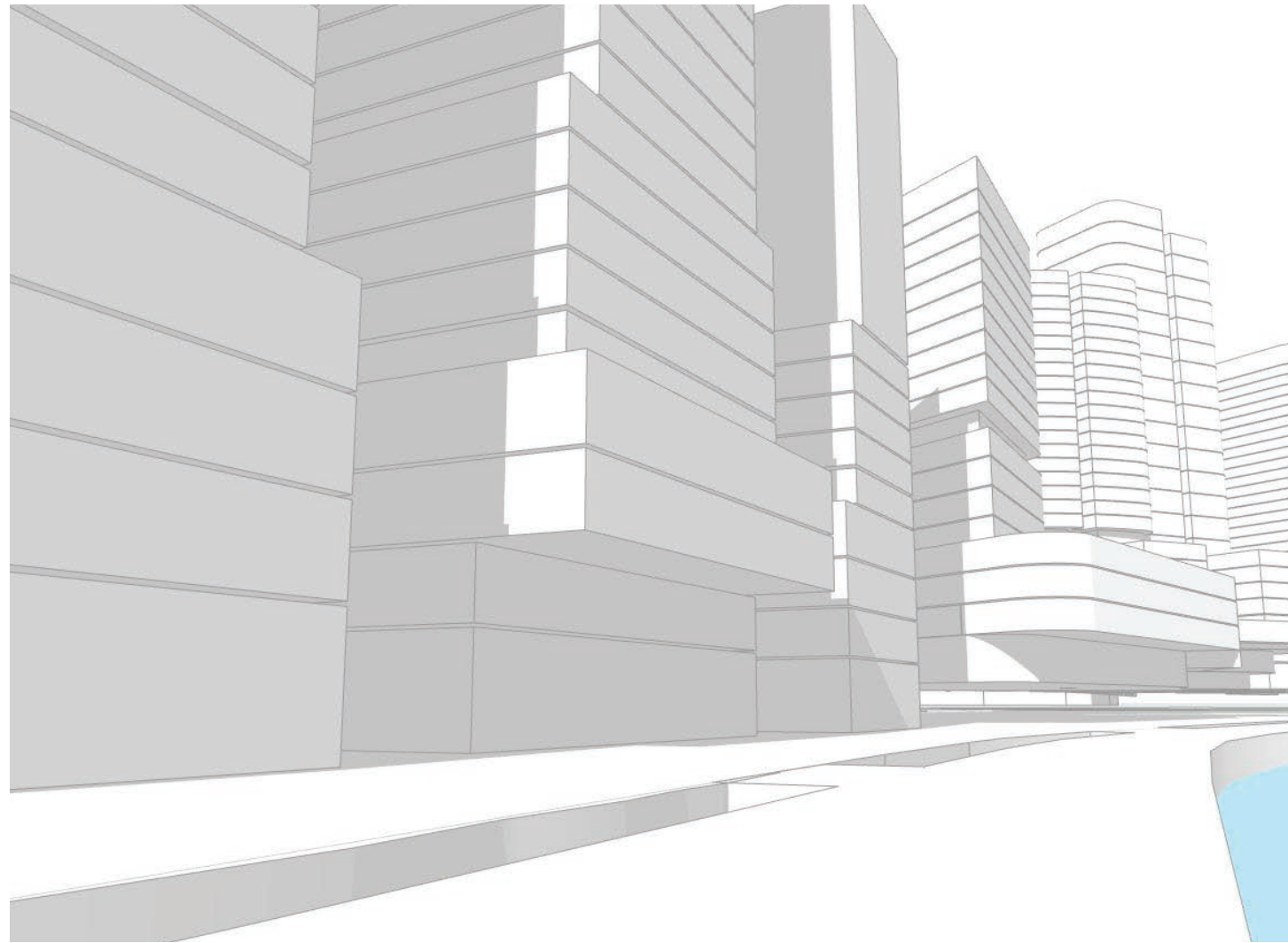
**DPIE CONTROL ENVELOPE**



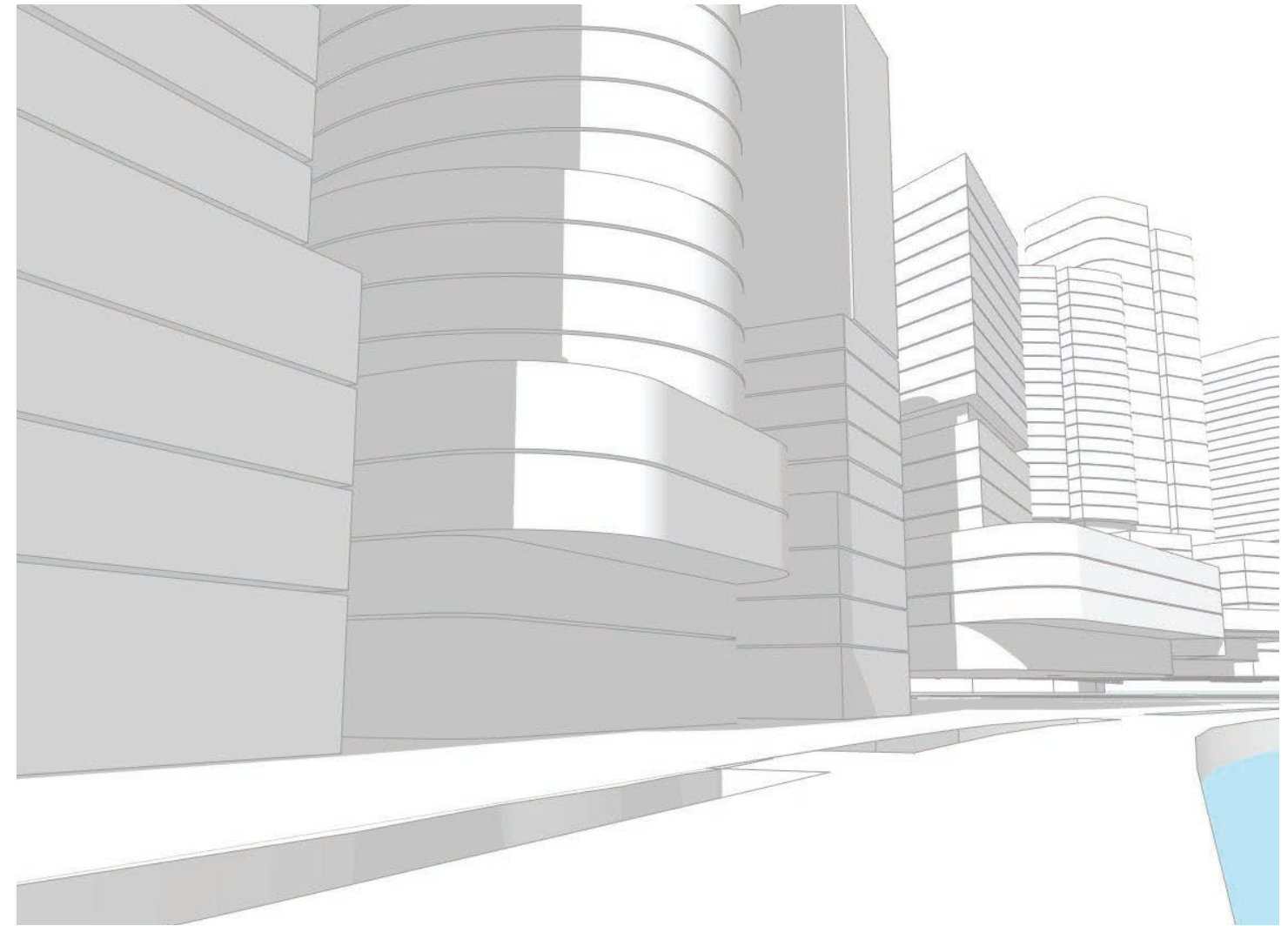
**PROPOSED 680m2 FLOORPLATE**



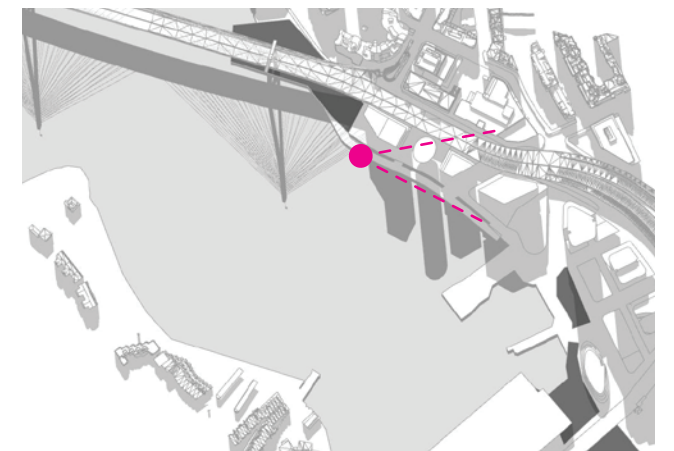
# SOLAR AMENITY - VIEW1 FROM PROMENADE SEPT 3PM



**DPIE CONTROL ENVELOPE**



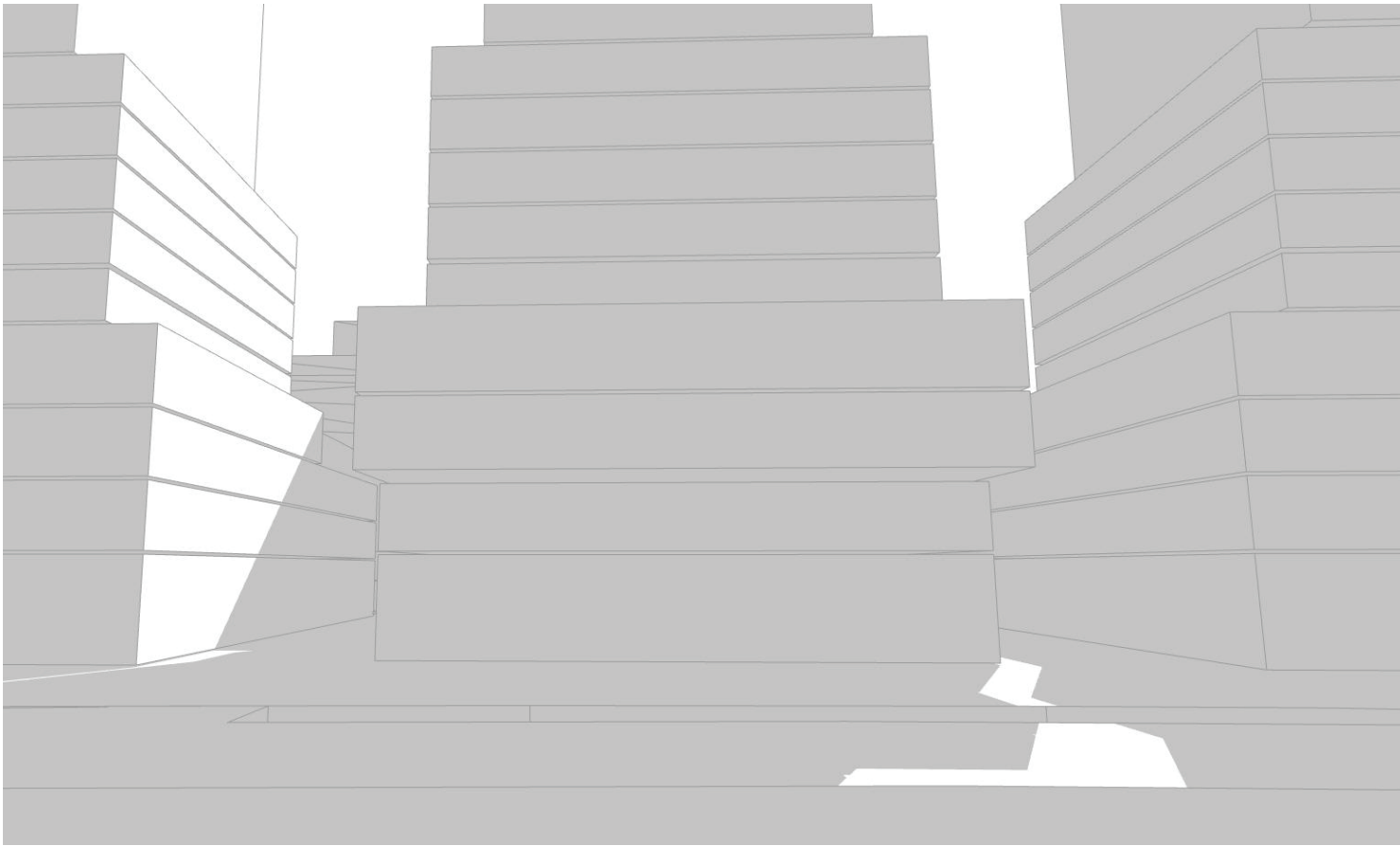
**PROPOSED 680m2 FLOORPLATE**



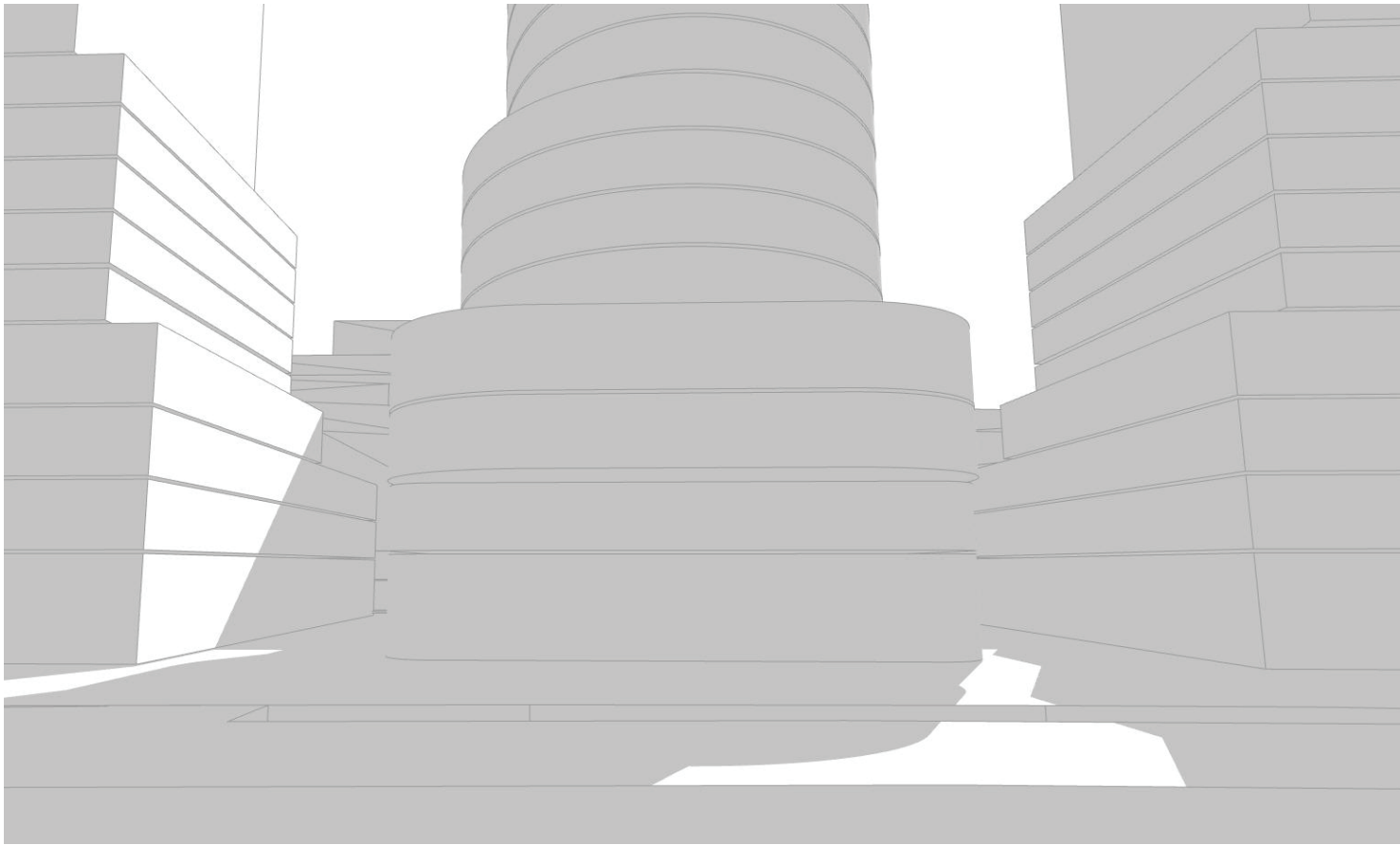


PROPOSAL

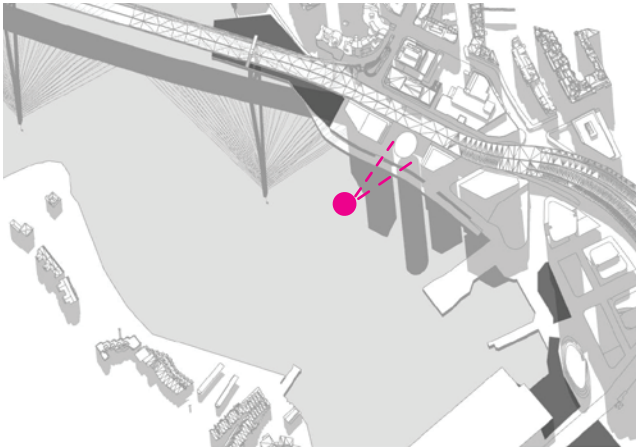
# SOLAR AMENITY - VIEW2 FROM PROMENADE SEPT 9AM



DPIE CONTROL ENVELOPE

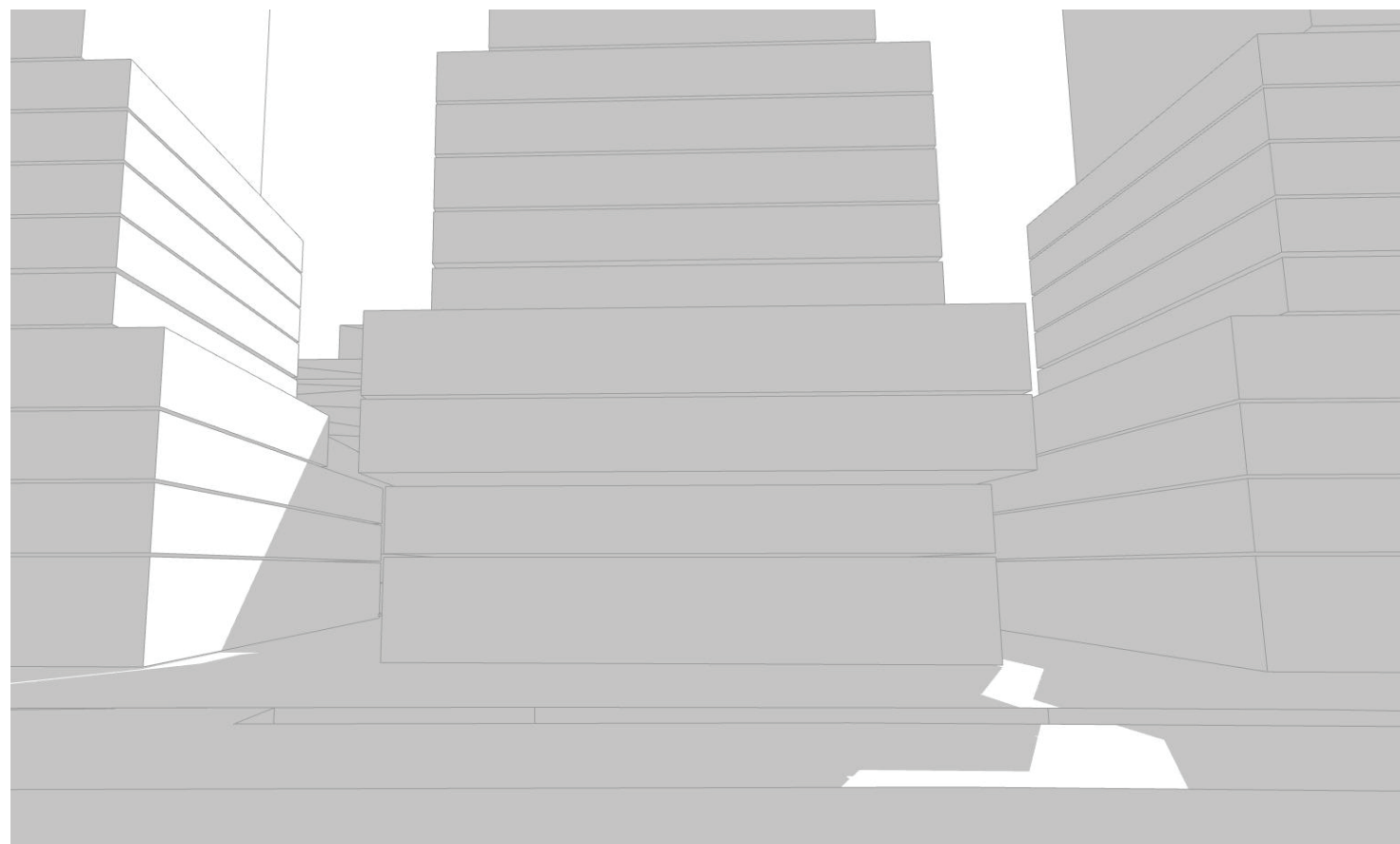


PROPOSED 680m2 FLOORPLATE



PROPOSAL

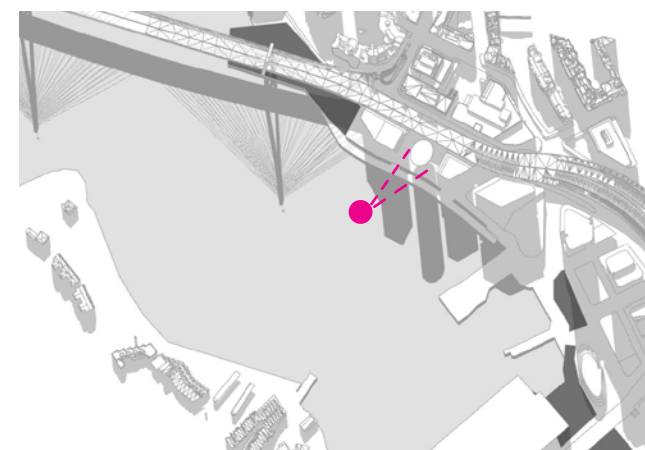
# SOLAR AMENITY - VIEW2 FROM PROMENADE SEPT 10AM



DPIE CONTROL ENVELOPE

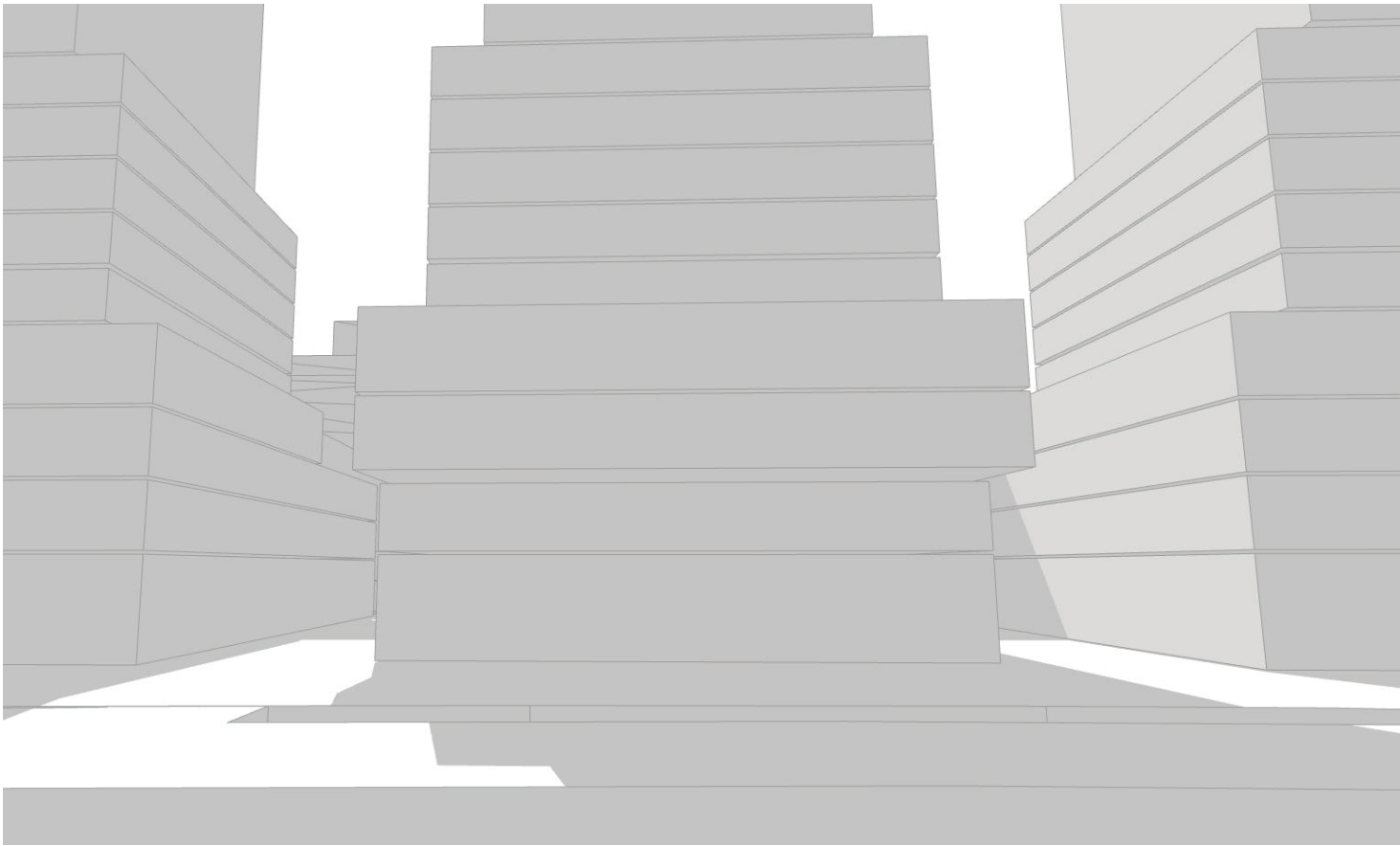


PROPOSED 680m2 FLOORPLATE

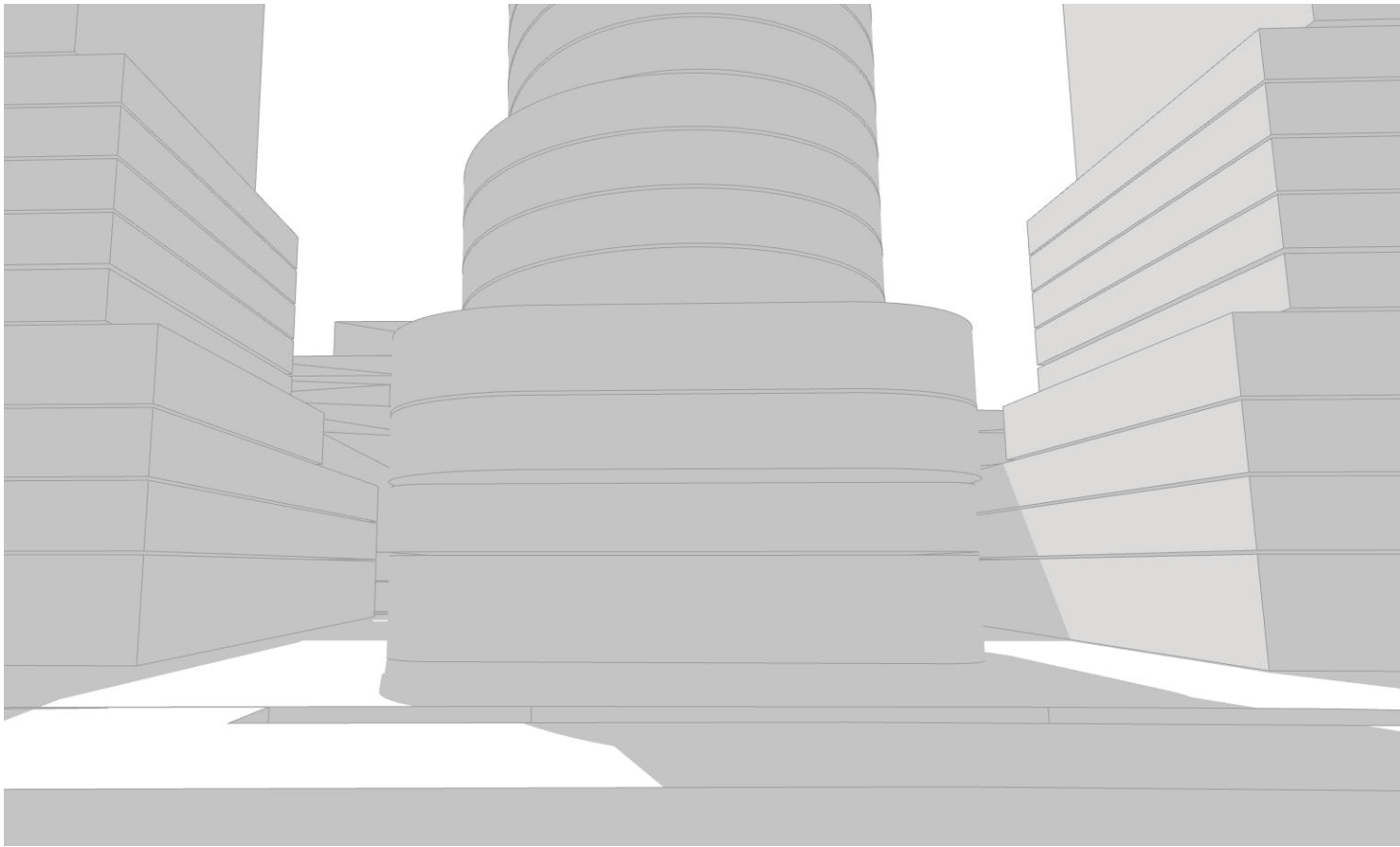


PROPOSAL

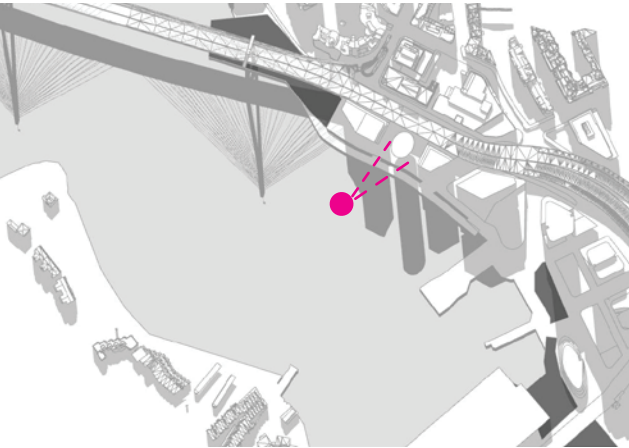
# SOLAR AMENITY - VIEW2 FROM PROMENADE SEPT 11AM



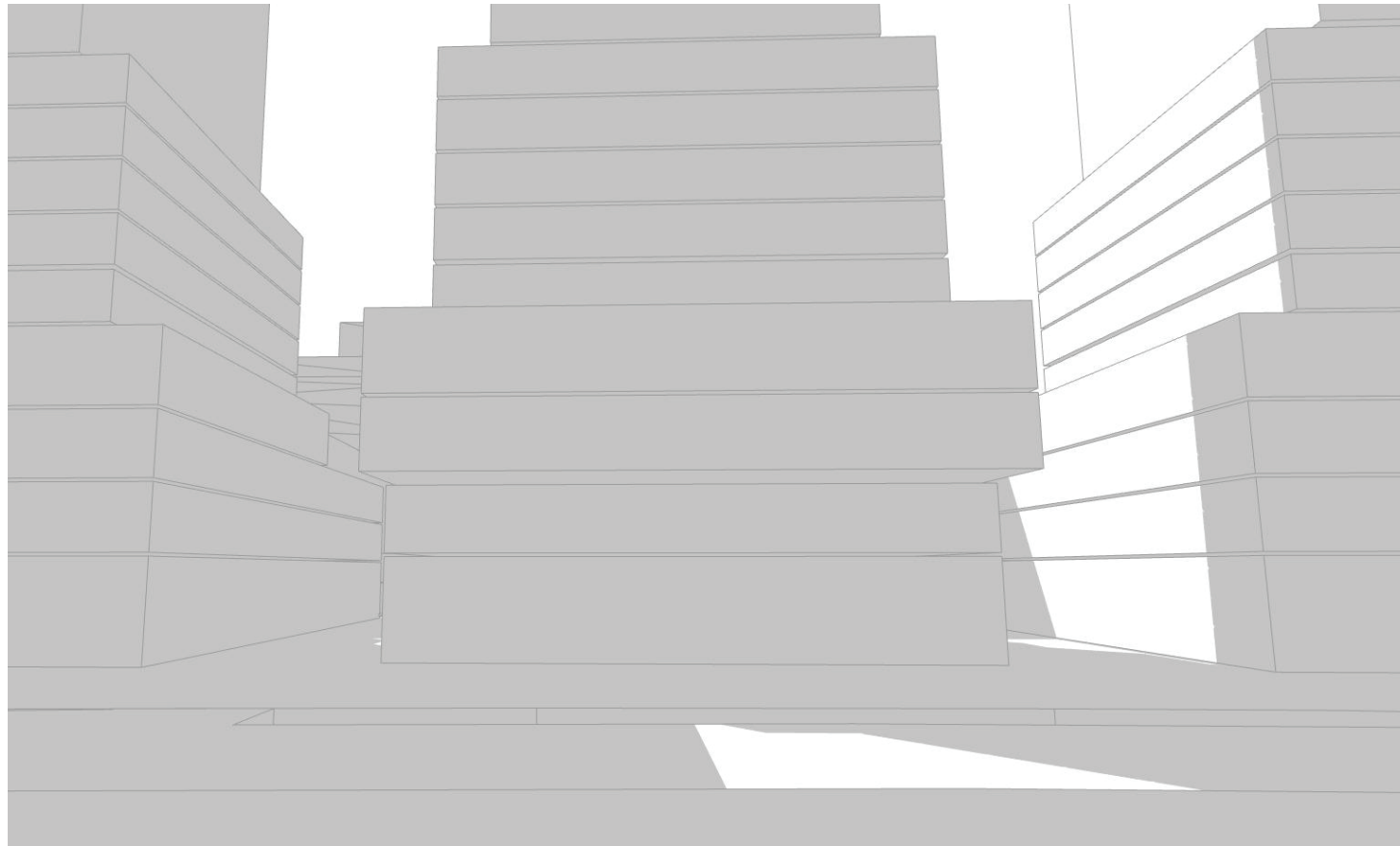
DPIE CONTROL ENVELOPE



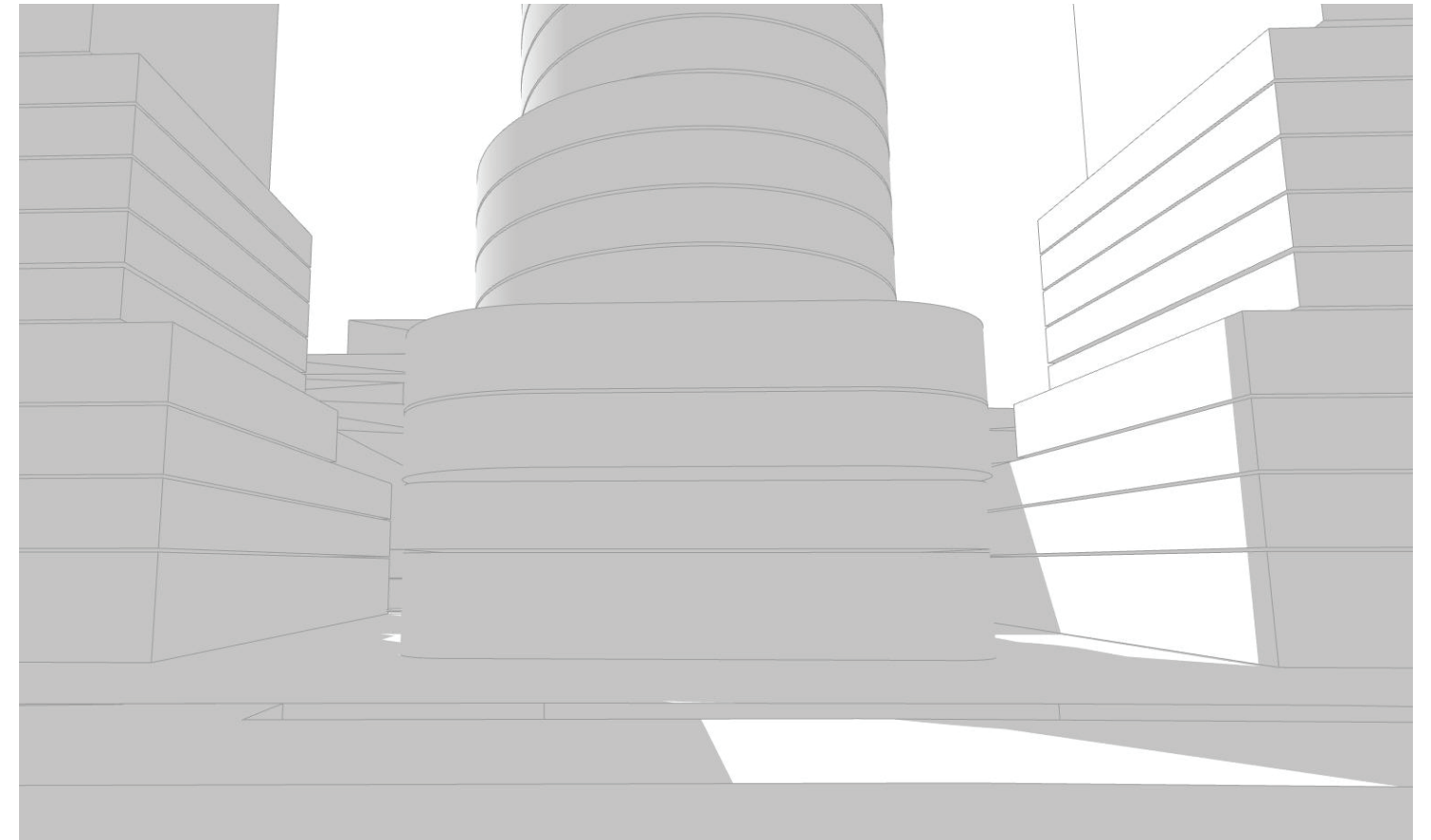
PROPOSED 680m2 FLOORPLATE



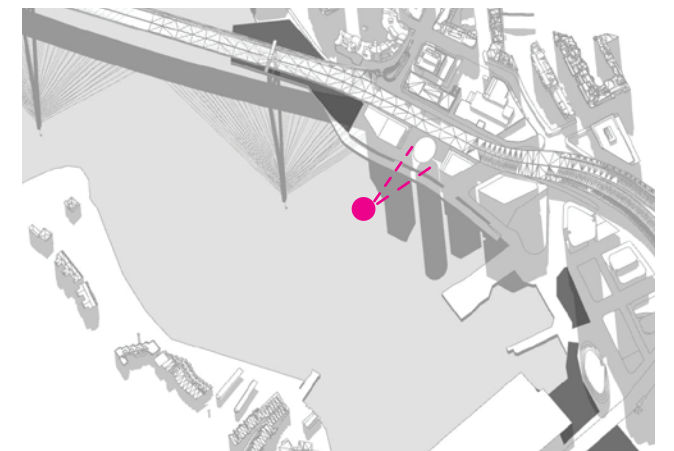
# SOLAR AMENITY - VIEW2 FROM PROMENADE SEPT 12PM



**DPIE CONTROL ENVELOPE**



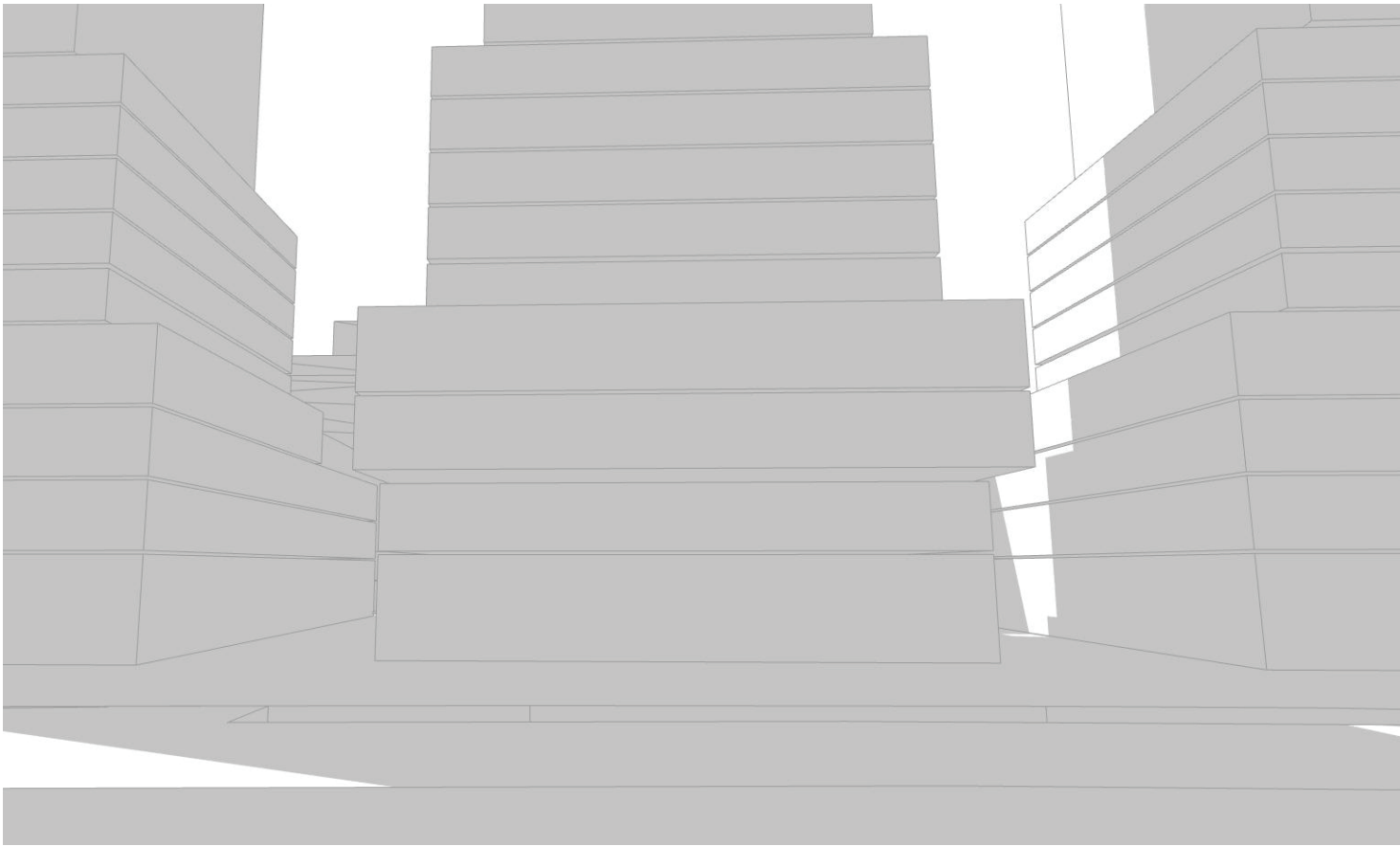
**PROPOSED 680m2 FLOORPLATE**



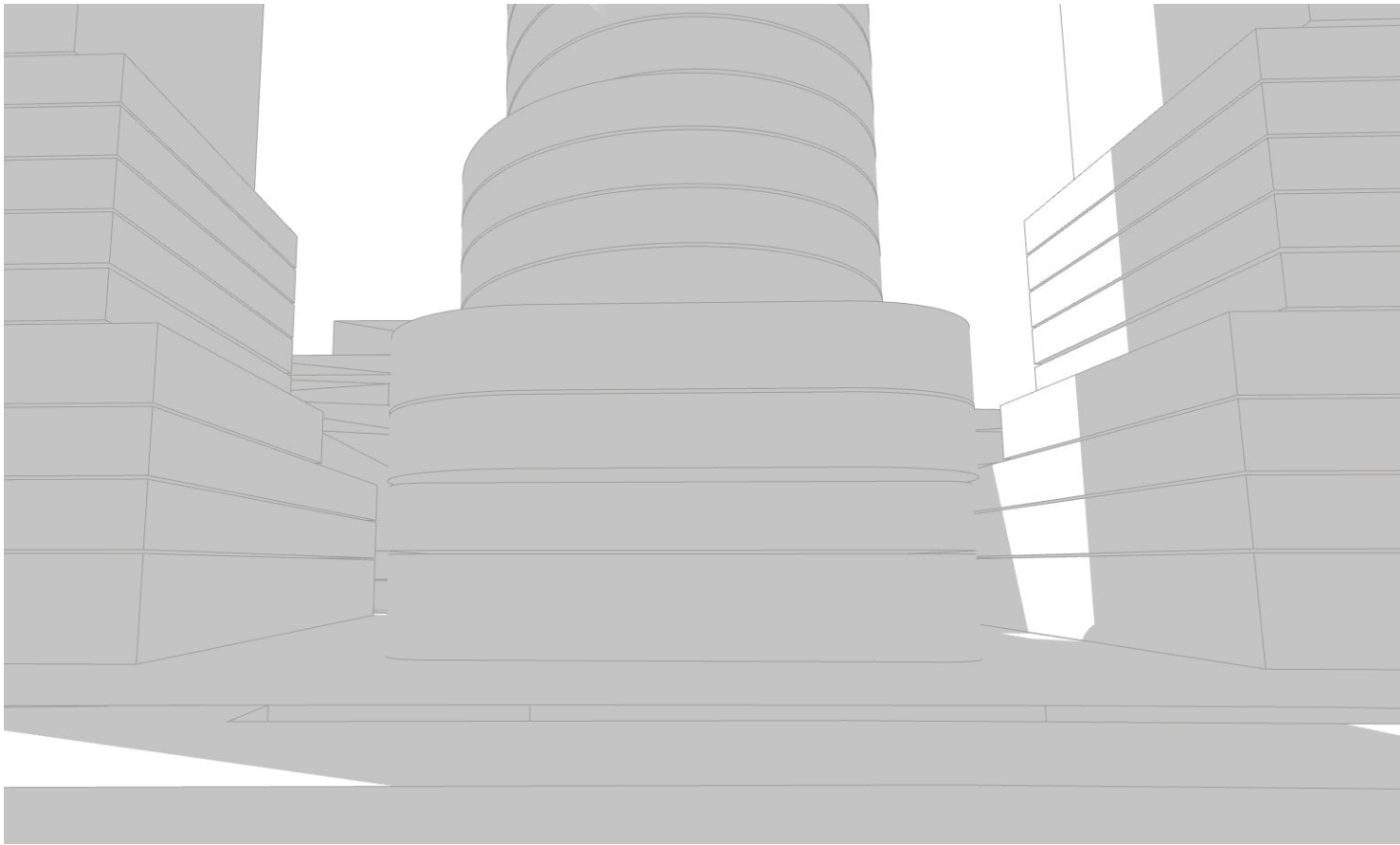


PROPOSAL

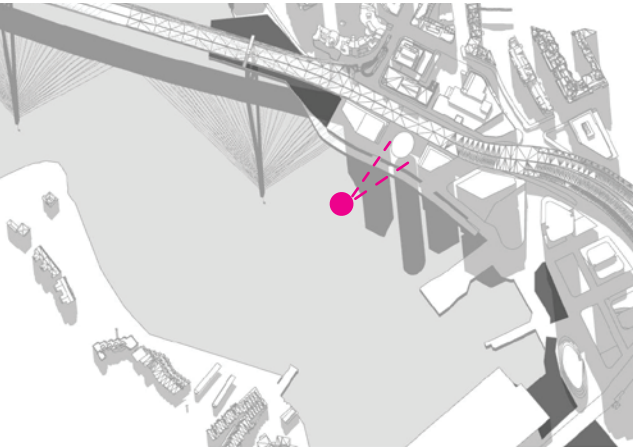
# SOLAR AMENITY - VIEW2 FROM PROMENADE SEPT 1PM



DPIE CONTROL ENVELOPE



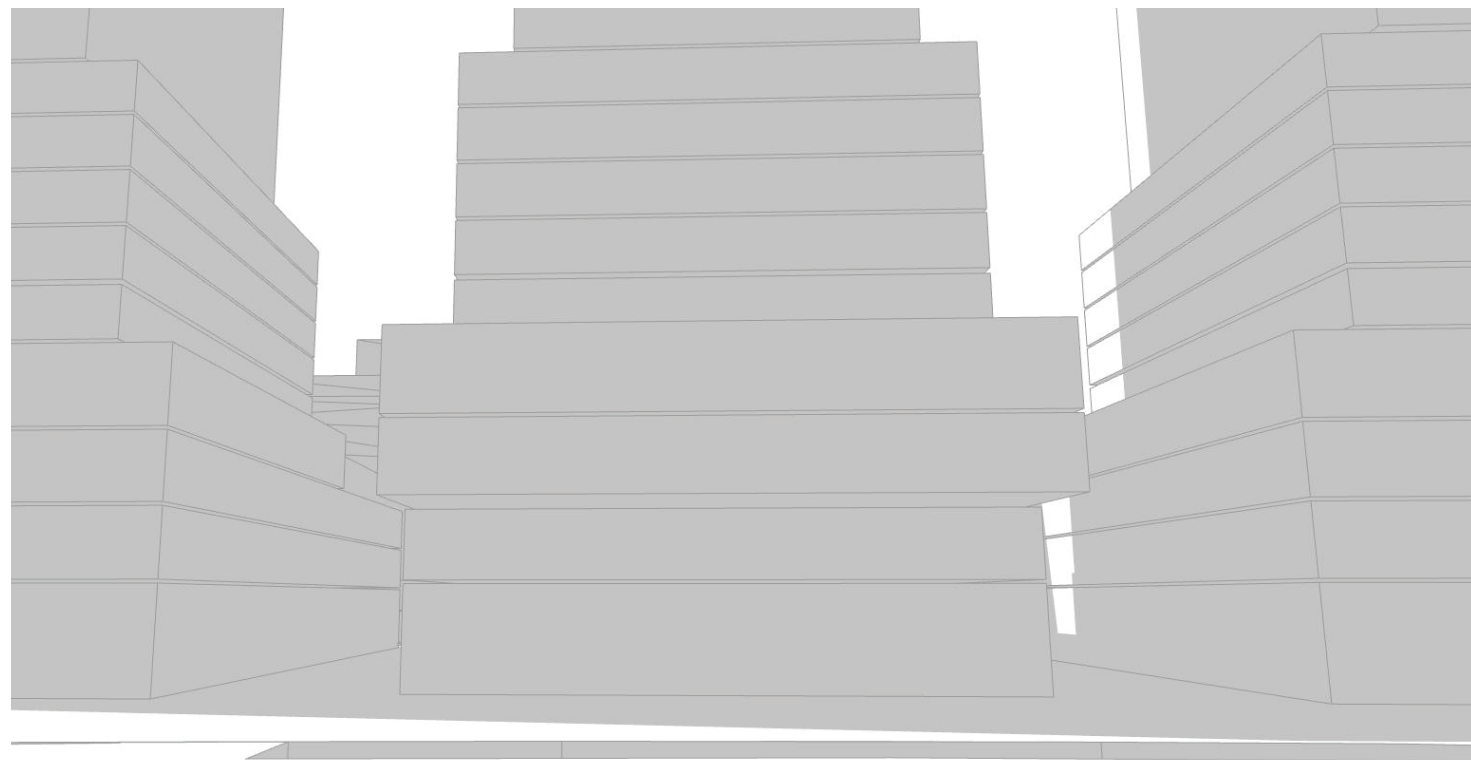
PROPOSED 680m2 FLOORPLATE



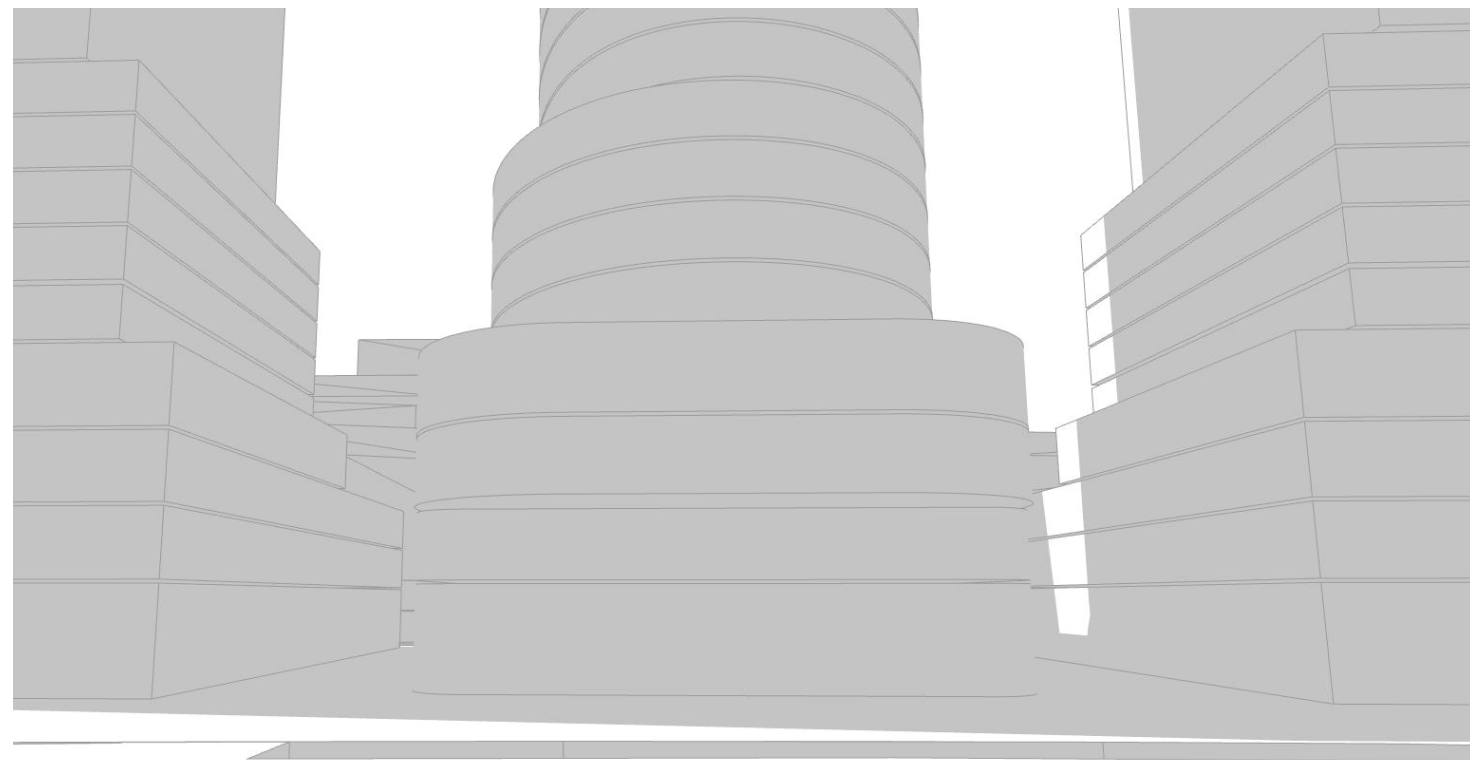


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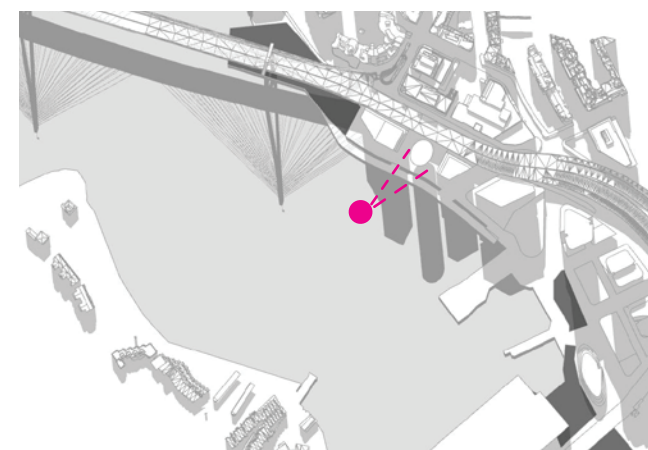
# SOLAR AMENITY - VIEW2 FROM PROMENADE SEPT 2PM



DPIE CONTROL ENVELOPE

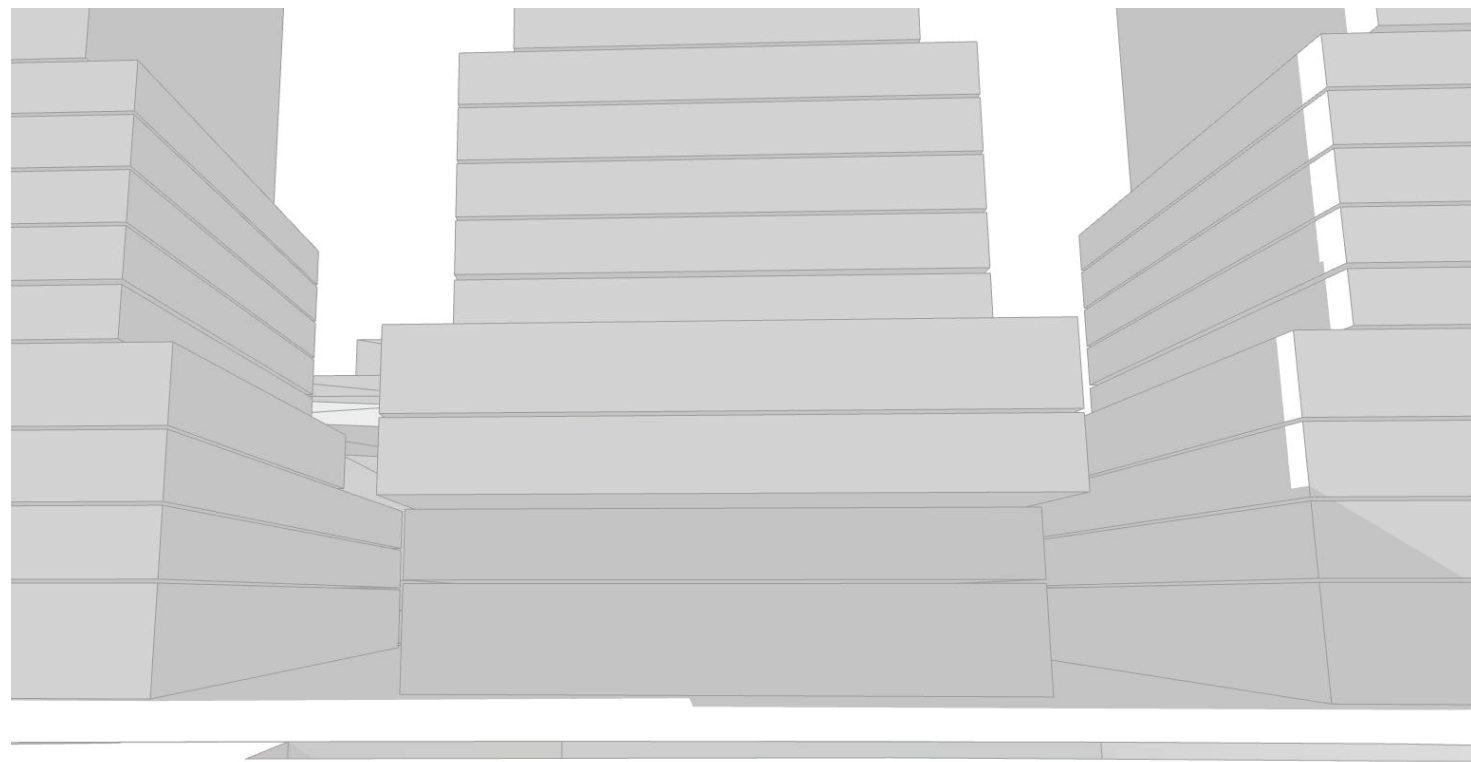


PROPOSED 680m2 FLOORPLATE

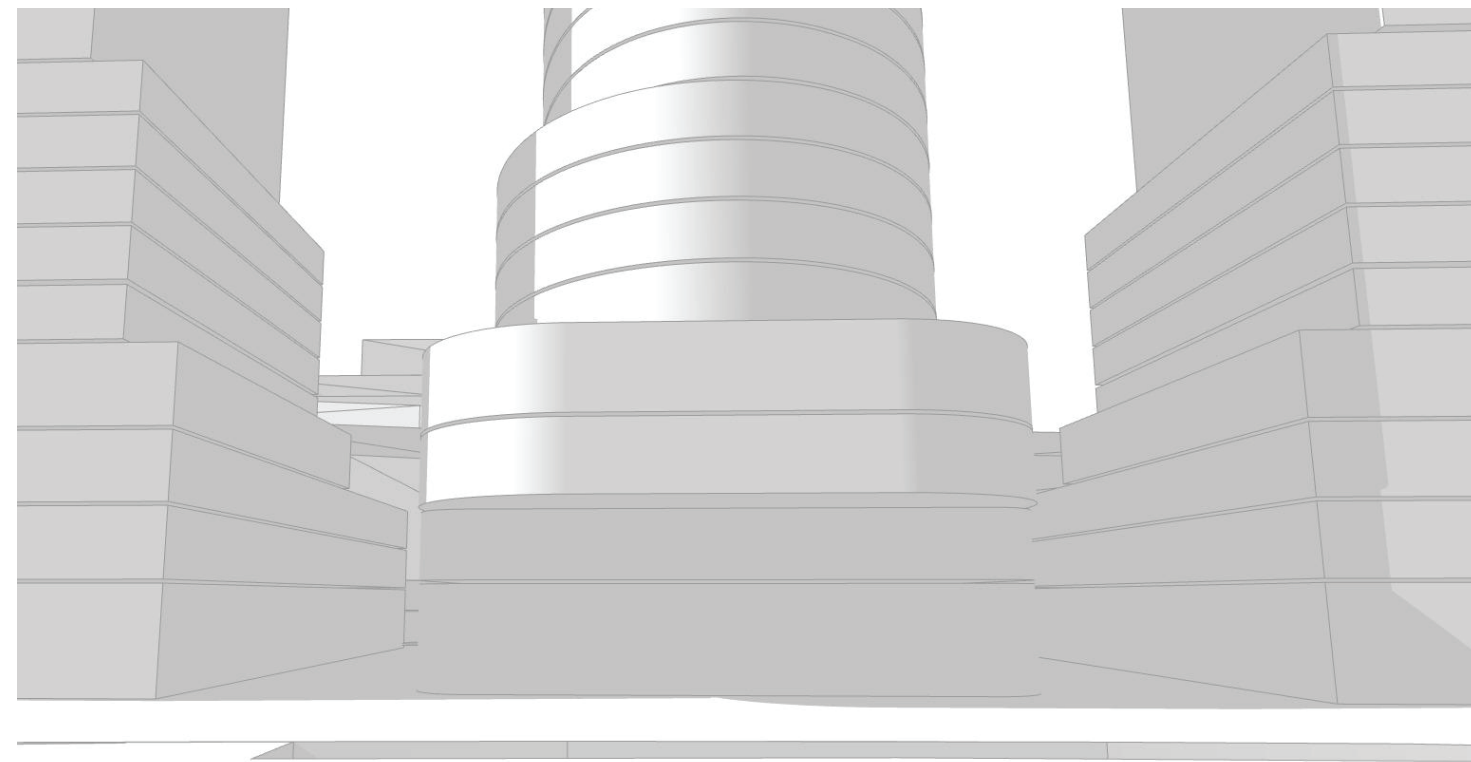


PROPOSAL

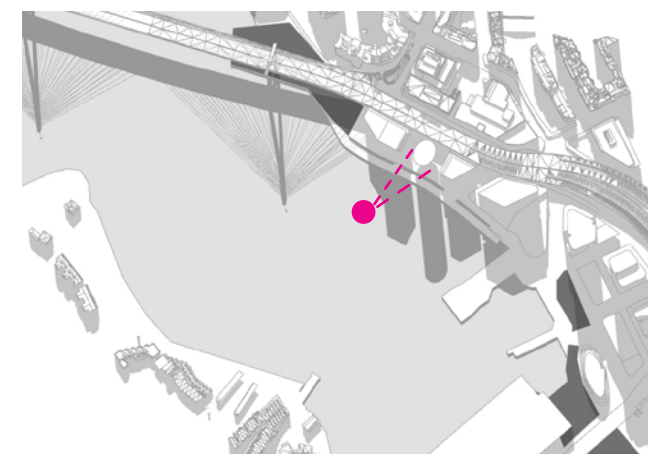
# SOLAR AMENITY - VIEW2 FROM PROMENADE SEPT 3PM



DPIE CONTROL ENVELOPE



PROPOSED 680m2 FLOORPLATE



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