



13 August 2025

Secretary
Dept of Planning, Housing & Infrastructure
12 Darcy Street
PARRAMATTA NSW 2150

SSD 67175465
JD6 (P&E)

ATTENTION: Russell Hand Principal Planning Officer

STATE SIGNIFICANT DEVELOPMENT APPLICATIONs 75660711 & 75662958
505 PACIFIC HIGHWAY CROWS NEST (OSD SITE A)
RESIDENTIAL & COMMERCIAL (MIXED-USE) PROJECT
APPLICANT: THIRDI CROWS NEST COMMERCIAL DEVELOPMENTS PTY LTD

Dear Secretary,

I refer to the recent public exhibition of the State Significant Development Applications comprising a detailed application and environmental impact statement, and a modification application for the approved concept development application, for the Crows Nest Over Station Development Site A, at 505 Pacific Highway (32 Hume Street) Crows Nest. Following a review of available documents, Council provides advice below, and recommended conditions (attached). The primary focus of this submission is, and conditions have been prepared, for the detailed development of SSD-75660711, which assumes approval of the revised concept development, SSD-75662958.

In summary, based on Council's assessment:

- Council remains concerned regarding the significant reduction in potential employment offered by the proposed development, compared to that promoted by the original concept approval.
- Although the proposed development aligns with the findings of the economic study prepared with the TOD precinct accelerated rezoning and the study (Appendix 67) submitted with the concept approval modification application, the potential social and economic impacts resulting from reducing employment and increasing residential uses potentially undermines the strategic outcomes promoted for the locality.
- An 'additional layer' of planning control, the Crows Nest TOD Precinct Design Guide (PDG). The exclusion of development control plans from the assessment of state significant development and its introduction, results in an impractical, complex and consequently less-than-transparent planning framework for the precinct.
- The PDG and LEP are not sufficiently supported by provisions and procedures to properly consider and require payment of a contribution towards affordable housing.
- The PDG does not indicate that suitable analysis has occurred in the district context, of future open space demand for this fast-growing precinct. Such evidence should be made available or a study undertaken to deliver open space required to satisfy population growth. A dire shortage of open space in North Sydney and the Lower North Shore is a looming issue. There are few opportunities to expand and enhance this without great expense.

Detailed Submission

This submission has been prepared with input from across Council's departments, and addresses:

- Affordable Housing
- Environment and Health,
- Development and Infrastructure Engineering,
- Heritage
- Landscape and Tree Protection,
- Transport and Traffic,
- Waste Management, and provides a
- Statutory Evaluation, a "high-level" assessment of the project.

Recommendations

Several of the recommendations of this submission were included in a previous submission relating to SSD-79240223, for 378-398 Pacific Highway Crows Nest, directly opposite the land the subject of this advice.

Several issues Council wishes to bring to the Secretary's attention are common to all development in the St Leonards - Crows Nest area or are strategic in nature and beyond the scope of individual proposals, suggesting the need for further planning to better-achieve precinct objectives.

Overview of planning controls

The submitted environmental impact statement and several volumes that support it have comprehensive information relating to the planning instruments, the PDG and the development control plan (DCP) which apply to the site.

Statutory controls including environmental planning instruments and other plans that apply to the site include:

- The Environmental Planning & Assessment Act 1979, section 4.40, which states section 4.15 of the Act applies to determination of State Significant Development.
- State Environmental Planning Policy (SEPP) (Planning Systems) 2021, clause 2.10 states that DCPs do not apply to State Significant Development.
- Several other SEPPs are procedural or administrative in nature and others also establish standards for assessing certain types of development and infrastructure.
- The principal local planning instrument, the North Sydney Local Environmental Plan 2013.
- The Apartment Design Guide, which applies to the residential component of the proposed mixed-use building.
- The Crows Nest TOD Precinct Design Guide, precinct-specific controls introduced to complement new height and floor space ratio standards, amongst addressing other requirements such as Connection with Country and open space, and
- The North Sydney DCP 2013 which applies controls for mixed use development and locality-specific controls for the St Leonards - Crows Nest area, noting it does not apply to this and other state significant development and remains applicable to local and regional development. Because the PDG 'calls-up' certain provision of the DCP, they do not apply due to cl. 2.10 of the Planning Systems SEPP.

As the Department is aware, the site has been the subject of significant increase in development capability since the adoption of the St Leonards - Crows Nest 2036 Plan (2020) and more recently the TOD Accelerated Precinct rezoning, published 24 November 2024.

Zone & development standards

The site is zoned MU1 Mixed Use, which permits the proposed development with consent, and prescribes a maximum height control of RL180m, an overall maximum FSR of 11.5:1 with a minimum non-residential FSR of 1:1.

According to the application, the site has a maximum overall permissible gross floor area of 44,608m² and a minimum non-residential gross floor area of 4,296m².

These development standards are complied with, according to information submitted with the application.

New controls for Crows Nest: Part 7 North Sydney LEP 2013

Other planning controls complement these development standards, included in a new Part 7 of the North Sydney LEP 2013. Key controls include:

Objectives: address increasing housing supply, enabling a variety of uses to optimise pedestrian access to public transport, delivering support for housing with access to public spaces, vibrancy and amenity, and increasing the amount of affordable housing.

Crows Nest TOD precinct design guide: the consent authority must be satisfied the proposed development is consistent with provisions of the precinct design guide (PDG) for the TOD precinct.

Design excellence: meaning the consent authority must be satisfied that the development will “deliver the highest standard of architectural, urban and landscape design.”

Affordable Housing: the site is part of Area 5, meaning that a monetary contribution for the equivalent of 15% of the residential component of the development. A combination of one or more units may be dedicated to Council with a monetary contribution making up the difference, to fulfil this clause’s requirement.

Certain “Affordable Housing Principles” apply, which must be considered before granting consent. Key principles are:

- Affordable rental housing being provided and managed “...to accommodate a residential population within areas representative of all income groups in North Sydney.”
- Rent not exceeding a benchmark of 30% of actual household income,
- Affordable rental housing being managed to maintain continued availability as affordable housing,
- Council using rent received or the proceeds of disposal, less expenses, to replace, improve or provide additional rental housing, and
- Affordable rental housing being built, in the consent authority’s opinion, to a standard consistent with the standard of other housing is the development.

Consideration of the Crows Nest TOD precinct design guide and other planning controls

Like a DCP, Part 3 of the PDG establishes precinct-wide objectives and provisions for design and assessment of development. The preceding two parts are strategic in nature and their over-arching, broad statements do not readily apply to assessment of development applications. Parts 4 and 5 have locality specific guidance for development of two sites, in Herbert Street St Leonards (in the Willoughby LGA) and the St Leonards Telstra Exchange site (530-542 Pacific Highway, in the North Sydney LGA), which were the subject of planning proposals at the time the TOD rezoning was prepared.

According to the PDG, applicable provisions of the North Sydney DCP should also be considered, however if DCP controls are inconsistent with the PDG, the latter prevails. The guide also notes that if the DCP makes provision for an aspect of planning the PDG does not, the DCP is to be considered.

As noted, the Planning Systems SEPP (cl. 2.10) states DCPs do not apply to state significant development, resulting in an inconsistency between the SEPP and the LEP. Clause 2.5 of this SEPP states that provisions of Chapter 2 – State and regional development, prevail over those of other planning instruments.

The consequence of this inconsistency is that the North Sydney DCP 2013 does not apply to State Significant development applications and would apply to local development applications in the TOD Precinct.

Recommendation

1. A review of the Crows Nest TOD Precinct Design Guide should be undertaken, to include those provisions of the North Sydney DCP 2013 that should apply to state significant and/or local development.

The Apartment Design Guide (ADG) is given statutory weight by SEPP (Housing) 2021, and the LEP and DCP are matters for consideration in accordance with s. 4.15 (1) of the Environmental Planning & Assessment Act 1979, noting that section 4.40 (EP&A Act) requires state significant development to be evaluated in accordance with section 4.15 EP&A Act.

Under cl. 7.3 of the North Sydney LEP 2013, the consent authority must be satisfied that the proposed development is consistent with the PDG for consent to be granted, assigning the PDG similar weight as the ADG.

In contrast, per s. 4.15 (3A) of the Act, more onerous controls than provided in a DCP must not be required and any requirement of a DCP is to be applied flexibly, when a DCP applies.

A matter not considered by the PDG is which would prevail if there were any inconsistency between the PDG and the ADG. The PDG is given weight by the LEP and the ADG is applied by virtue of being a requisite consideration under the SEPP (Housing) 2021. Like the Planning Systems SEPP, the Housing SEPP has provisions that it prevails over any other planning instrument in the event of inconsistency. Arguably therefore, the SEPP could prevail over the LEP, and the ADG may prevail over the PDG.

Assessment of the proposed building against key controls of the above planning regime is provided in this submission.

AFFORDABLE HOUSING

Monetary contributions towards affordable housing in the precinct

As the TOD Precinct controls in the LEP were developed by the State Government, Council has sought clarification from the Department regarding the policy intent in calculating the equivalent monetary affordable housing contributions. This is particularly important, as the SSD under consideration is one of the first to apply the provisions of the TOD through this development pathway.

At the time of writing, while Council's request has been verbally acknowledged by the Department, Council is awaiting a formal written response, limiting Council's consideration of this component of the assessment, within the limitation of the exhibition period, and in the absence of a precedent.

Recommendation

2. Council and the Department engage collaboratively to assess and determine the most effective way forward for calculating the appropriate affordable housing monetary contribution to give effect to the need for affordable housing and ensuring a clear and transparent inter-governmental process.

LANDSCAPE DESIGN

The proposed development is supported, based on the understanding that street tree planting to the southern perimeters of the subject site will be planted under agreement with Sydney Metro, and do not form part of the subject application.

Recommendation

3. As included with other recommended conditions, awnings proposed under this proposal shall include cut-outs that allow unimpeded future canopy growth for all future street tree plantings.

ENGINEERING

Development engineering

Council's development engineer has assessed the proposal regarding the following matters and concludes conditions can be imposed to ensure compliance with Council's requirements:

- Traffic management,
- Parking and access,
- Stormwater,
- Sediment and erosion control, and
- Excavation and retaining walls.

The attached recommended conditions address these matters.

Transport and traffic engineering

Parking and transport impacts have been considered and recommendation are provided. The assessment concludes that:

- Traffic generation is acceptable.
- The green travel plan is supported.
- Further consideration is required regarding certain parking arrangements, as recommended.
- Car parking should generally be minimised as much as possible.

Recommendations (included in conditions)

4. At least 6 accessible parking spaces be provided.
5. No more than 24 motorcycle spaces be provided.
6. Bicycle and end-of-trip facilities should be provided in accordance with the North Sydney DCP 2013.
7. Off-street bicycle parking should be made available for workers of retail and business premises in the development.
8. Regarding construction traffic management:
 - a. The use of vehicles greater than 12.5m HRV on Council's road network due to public safety risks is not supported. It is recommended that vehicles be restricted to a maximum of 12.5m HRV. Any larger vehicles proposed must be justified to demonstrate why they are required and how it is the safest feasible option.
 - b. Please insert "Construction vehicles MUST AVOID travelling through school zones during school peak hours to minimise safety risks and congestion."
 - c. Intersections that form the haulage route in North Sydney's LGA should be reviewed to confirm the largest proposed construction vehicle can safely negotiate through the road network without impacting on parked cars or Council's infrastructure

HERITAGE

Having reviewed the proposal, Council's conservation planner has recommended conditions, included in the attachment, to:

- Implement a monitoring programme for structural damage to the St Leonards Centre.
- Develop a temporary protection plan that identifies the potential risks and outlines measures to reduce the potential for damage to heritage fabric of the adjacent St Leonards Centre building during the works.

- The temporary protection plan should include a monitoring regime that will allow for ongoing crack monitoring of the adjacent heritage building by the built heritage specialist in association with a heritage engineer during the construction period.

WASTE MANAGEMENT

Recommended conditions require the operational waste management plan and facilities for the proposed development to satisfy Council's DCP regarding waste management.

ENVIRONMENT & HEALTH

Standard conditions are recommended to address matters relevant to the proposal, primarily concerned with noise and vibration during and after construction.

EVALUATION: Section 4.15 EP&A Act

A 'high-level' assessment of the proposed development is presented below considering the key controls of:

- **SEPP (Housing) 2021**, Chapter 4, principally the 9 Design Principles for Residential Apartment Development. Key inconsistencies with the ADG are discussed in relation to the design principles, they are not repeated in a separate ADG assessment.
- **Part 7, North Sydney LEP 2013**, a high-level assessment has been made.
- **Crows Nest TOD Precinct Design Guide**, a high-level assessment has been made.

The North Sydney DCP, Part B Section 2, Commercial and mixed-use development, and Part C Section 3 St Leonards Crows Nest Planning Area, have not been considered against otherwise applicable DCP provisions, in accordance with cl. 2.10, Planning Systems SEPP, as discussed.

Recommendation

9. The Precinct Design Guide be amended to include other provisions of Council's DCP, in collaboration with Council, to address the anomaly introduced with the PDG.

Housing SEPP- Design Principles

1. Context and neighbourhood character

The proposal being compliant with key development controls and using contemporary design and materials, is compatible with the precinct's emerging character.

2. Built form and scale

The LEP-prescribed maximum building height of RL180m is complied with. Setbacks of the PDG and the DCP are complied with, and a tower separation distance of 12m is provided, which is further discussed below.

Regarding ground level setbacks, podium height and tower setbacks to street boundaries, the Design Integrity Report by Woods Bagot which accompanied the application states:

Setbacks

Figure 10 of the Crows Nest TOD Design Guidelines includes a diagram outlining the recommended setbacks for buildings exceeding the suggested street wall height in Figure 11. However, the recommended street wall height for our site does not account for the existing metro building. For instance, Clarke Lane has a recommended 2-storey street wall, while Oxley Street, Pacific Highway, and Hume Street have a recommended 3-storey street wall.

The metro station, which has already been constructed, reaches approximately 5 storeys (around 15m tall) from the Oxley Street corner to the top of the metro box parapet. As a result, the recommended street wall height is not achieved—not due to our design, but because of the pre-existing built environment.

Additionally, Figure 10 recommends setbacks of 1.5m along Oxley and Hume Streets and 3m along Pacific Highway and Clarke Lane. The approved Site A envelope provides the following setbacks:

- *Pacific Highway: 1.5–3m*
- *Clarke Lane: 2–2.8m*
- *Oxley Street: 1.5m*
- *Hume Street: 1.5m to RL 127, increasing to 42m up to RL 176.60*

The intent behind the raking setback to Hume Street is to transition the Site A massing towards this pedestrian corridor while ensuring adequate solar access to Ernest Place during the afternoon of the March/September equinox. The proposed design aligns with these objectives. The massing of Tower 03 is intentionally lower than Towers 01 and 02 to scale down the precinct towards Hume Street, addressing overshadowing concerns. Shadow studies conducted by Virtual Ideas confirm this approach.

Having regard to site and context-specific conditions as outlined, proposed podium setbacks are appropriate.

However, the 12m building separation between the residential towers is less than that of the ADG's Design Criteria 3F-1, particularly regarding buildings over 25m in height, which requires 24m separation between habitable rooms (rooms facing each other in towers one and two, and two and three, satisfy the ADG's Glossary definition of habitable rooms). Means of maintaining privacy according to the plans are fritted and tinted glazing. This cannot be regarded as being acceptable given the number of units that will be compromised by this element of the proposal.

Separation between the proposed residential buildings and foreseeable future residential buildings to the north-east are also generally below the 12 meters from centre-line of lane setback to satisfy shared total separation of 24 metres above 25 metres in building height. This development should not 'borrow' setbacks (amenity) and thus development potential from other nearby sites.

Recommendation

10. Given significant variation of the Apartment Design Guide's building separation provisions the development should be refused, or amended to have better regard for the setback and building separation objectives of the ADG. The option of developing two residential towers instead of three and integrating the affordable rental apartments with the build-to-rent apartments, would be preferred.

The revised design approach as recommended, would result in the development being consistent with clause 15 (g) of the Housing SEPP, which states:

(g) *affordable housing must consist of dwellings constructed to a standard that, in the opinion of the consent authority, is consistent with other dwellings in the area.*

And clause 7.5 (1) (e) in Part 7, being the LEP's TOD controls, provides Affordable Housing Principles, which include, *inter alia*:

(e) *affordable housing must consist of dwellings constructed to a standard that, in the opinion of the consent authority, is consistent with the same type of dwellings forming part of the proposed development that are not intended to be used as affordable housing, particularly in relation to internal fittings and finishes, solar access and privacy.*

Clause 7.5 (4) gives weight to the principles, as follows:

(4) *Development consent must not be granted to development to which this clause applies unless the consent authority has considered the following—*

(a) *the Crows Nest Transport Oriented Development Precinct Affordable Housing Principles,*

(b) *the impact of the development on the existing mix and likely future mix of residential accommodation in North Sydney.*

3. Density

According to the application, the maximum overall floor space ratio of 11.5:1 and the minimum non-residential FSR of 1:1 are complied with.

4. Sustainability

It is noted that there is a significant non-compliance with the design guidance for solar access, with 55% of dwellings receiving the minimum 2 hours mid-winter sun, not the minimum 70% of dwellings. In an attempt to mitigate this result, 72% of units have dual aspects to improve daylight access, Increasing building separation would likely be more effective. A revised design is necessary and satisfy the ADG and clause 7.5 (1) of the LEP.

Recommendation

11. The proposal's design should be revisited to improve solar access performance to at least the minimum guidelines of the Apartment Design Guide. As suggested, a two-tower development would likely improve solar access performance.

5. Landscaping

This is discussed above. None of the site offers deep soil, which is typical in localities transforming into high density, mixed-use locations with limitations caused by site conditions. Whether adequate provision of public open space is provided at the precinct level via acquisition or other means has not been addressed (and should have been), except for the small park (relative to likely demand) proposed in the in the “Lithgow Street block”, the area bounded by Lithgow Street, River Road, Christie Street and Oxley Street.

6. Amenity

In terms of urban amenity, the design has suitably considered and addressed local conditions and its immediate proximity to the Metro Station, and other services and facilities available in the precinct.

7. Safety

A comprehensive “Crime Prevention Through Environmental Design” study was exhibited with the application, which demonstrates satisfactory performance in terms of reducing the risks related to safety and security arising from potential criminal and anti-social behaviour.

8. Housing diversity and social interaction

The development proposes a mix of 1, 2 and 3 bedroom dwellings with 418 build-to-rent dwellings and 56 permanent, affordable rental dwellings. Proposed affordable housing will offer accommodation for very low, low and medium income households in a highly accessible location.

9. Based on Council's recent experience with build-to-rent projects that incorporate affordable rental housing, a common design objective is to separate the 'market' housing from the 'affordable' housing, providing the former with a higher standard of architecture and services, compared with the latter. The apparent rationale for the separation, is to allow separate management of each type of housing, to satisfy the requirement for affordable housing to be managed by community housing provider.

In this application, the third, shorter tower is devoted to exclusive use as affordable housing, with a distinct architectural expression, differing from the two market-rental towers. An overview of the plans indicates the services and amenities available for lower income households that will reside in the affordable apartments differ significantly from those that will be available to those renting at market rates. Market-renters are offered larger and more diverse forms of lifestyle, recreational and leisure facilities.

A two tower solution would likely necessitate combining affordable and market housing in at least one of the two residential buildings. It would be possible to design this to achieve the separation for management reasons, however equal access to facilities could also be facilitated, thus eliminating the potential 'have' and have-not' dichotomy.

10. Aesthetics

No comment, although the materials and vernacular proposed are presently popular and will probably serve to mark a period in Sydney's design and architecture, of the early to mid-21st Century, in years to come. An integrated and unified expression would also be preferred to the social duality reflected in the proposed design.

Part 7 North Sydney LEP 2013

7.1 Objectives

The proposed development is questionably consistent with precinct objectives, as it will:

- Increase housing supply,
- Enable a variety of land uses with proximity to the Metro Station. Non-residential activities in the building include 5 shops and a commercially operated gymnasium. Although submitted to be compliant with the site's non-residential FSR, railway stations are typically associated with much higher levels of commercial activity, able to capitalise on high volumes of pedestrian traffic. This appears to be an opportunity forgone by this proposal.
- Deliver housing supported by albeit limited and arguably inadequate public spaces, vibrancy and community amenity, which will probably be 'borrowed' from the organic 'urban village' that Crows Nest has evolved into throughout its history.
- Increase the amount of affordable housing. The economic studies prepared for the TOD precinct rezoning and submitted with the application indicated a relatively high number of low to medium income jobs in the broader locality, including in Royal North Shore Hospital-centred health district, local retailing and the nearby Artarmon industrial area.

Recommendation

12. Whether the quantum of affordable housing will be sufficient to arrest the high numbers and distances of commuter trips of the present and recent past will be reduced as anticipated, is unknown. This should be regularly monitored and the plan adjusted to amend the proportions of affordable housing to be delivered, if required.

7.3 Design guide

The consent authority must be satisfied that proposed development is consistent with the precinct design guide (PDG), which is considered below.

7.4 Design excellence

This clause sets out assessment criteria, the majority (if not all) of which are requisite considerations under the s. 4.15 of the EP&A Act, the LEP, the DCP (were it to apply to the subject development), the ADG and Housing SEPP, as complemented by the PDG. They require no further consideration by this submission.

7.5 Affordable housing

Addressed previously.

Crows Nest TOD Precinct Design Guide (PDG)

The first two parts of the PDG are introductory and strategic in nature.

Part 3 contains “Precinct-wide Design Guidelines”, applicable provisions are considered below.

Chapters 4 & 5 apply to specific sites.

Part 3

3.2 Connecting with Country

The submitted ‘Connection to Country’ report was prepared in collaboration with Aboriginal consultants, informed by a ‘walk on Country’, and outlines plans for future Aboriginal participation.

3.3 Land use

The proposal is broadly consistent with the objectives for land use. However, consistency would be improved if the minimum non-residential floor space ratio were exceeded and a diverse range of retail premises included. Monitoring and measurement of the TOD plan’s performance against its objectives would also be useful.

Recommendation

13. Monitoring of the effects of the precinct’s development against established objectives for the TOD should be undertaken, with regard to:
 - a. Defining and achieving an appropriate balance of jobs and housing,
 - b. Suitability of land use mix to optimise the investment made in public transport,
 - c. Adequacy of public spaces, in terms of size, type and location, and
 - d. Sufficiency of the affordable housing to be delivered, to satisfy community demand for affordable housing, and reduce travel demand,

while also considering longer term impacts on the community, and local infrastructure.

3.4 Built form

Built form is by and large the result of the applicable planning framework, with which the proposal is consistent.

3.4.1 Solar amenity and overshadowing

The building envelope (concept design modification) has been developed to maintain solar access to Willoughby Road, Hume Street and Ernest Place, especially by lowering the height of tower 3.

3.5 Minimum lot size

No minimum lot size applies to the site.

3.6 Landscape and Environment

3.6.1 Public spaces

The PDG’s objectives promote standards for providing open space close to (within 200m of) the Metro Station. The provisions do nothing to realise the intent of the objective, except propose one small (2,000m²) park on the corner of Christie Street and Oxley Street, which is about 280m from the main pedestrian entry of the station, in addition to other open space and its upgrading, such as Hume Park, Ernest Place and the closed section of Christie Street opposite the site of the park proposed by the precinct plan.

There is no analysis in the PDG to indicate whether the population expected to be accommodated in the TOD precinct will be properly catered for in terms of the type, size and distribution of open space.

Recommendation

14. In an apparent lack of analysis to inform an adequate provision of the type, size and suitable location of additional open space required, such analysis should be provided, or a study should be undertaken as outlined above for the entire St Leonards-Crows Nest 2036 defined area, in a sub-regional (Lower North Shore) context, and the design guide and other planning controls be amended or introduced accordingly, to acquire land and embellish the land to provide for the long-term needs of existing and future residents and workers of the district, based on the findings of such a study.

3.6.3 Tree canopy, deep soil and biodiversity

Deep soil – it does not appear that the proposal includes any deep soil, unencumbered above or below ground level by structures or utilities, as promoted by the design guide. It is understood that street trees will be provided as part of the concept approval/agreement with Sydney Metro. Awnings and the like should be carefully designed to coordinate with the planting proposed.

3.7 Design excellence

This clause reproduces the provisions of the LEP and need not be considered further. The urban design analysis has identified elements of the proposal that do not comply with urban design excellence requirements.

As discussed, the approach to the build-to-sell and build-to-rent elements of the proposal are notably different. The affordable rental building to the south of the market rental apartments has significantly poorer amenity and cannot be considered designed or likely finished to a standard consistent with other housing in the development.

3.8 Setbacks

Setbacks have been considered in relation to the Housing SEPP's Design Principles and ADG design objectives.

3.9 Street wall heights

As above.

3.10 Movement

The Metro Station is a key focus of the precinct with all adjacent streets and the Pacific Highway being key links in the movement network.

3.11 Carparking

Parking is addressed in the comments from Council's transport team.

3.12 Wind management

This matter has been addressed in a 'pedestrian wind study'. Its recommendations are expected to be addressed in a condition, should consent be granted.

3.13 Flooding

Council's engineers have considered Council's Interim Floodplain Management Policy, and have not made any recommendations regarding flood management, as none is necessary.

CONCLUSION

In conclusion, Council appreciates the opportunity to make this submission.

Council's grounds for objection hinge upon less-than-optimal design outcomes in terms of amenity and equity, and adverse and potentially irreversible economic and social impacts. The project fails to realise and support the Government's own and Council's strategic planning, economic and social objectives. Overall, the proposal's design results in poor amenity for the affordable housing due to inadequate internal separation between the three towers and potential future development to the north-east across Clarke Lane.

Consequently, approval of the application cannot be supported, unless some form of commitment is given to implementing the recommendations of this and other Council submissions for the St Leonards - Crows Nest locality.

Should you wish to discuss the contents of this submission, please contact Mr Jim Davies, Executive Assessment Planner, on 9336 8378, or at jim.davies@northsydney.nsw.gov.au.

Yours sincerely



Stephen Beattie
BUSINESS SERVICE UNIT MANAGER DEVELOPMENT SERVICES

12/08/2025