



PLANNING AND INFRASTRUCTURE
Planning Unit

23 June 2026

Director Housing Delivery
Housing Supply and Infrastructure
Department of Planning, Housing and Infrastructure
Locked Bag 5022,
Parramatta NSW 2124
Att: Stephanie Wood

Dear Stephanie,

**Re: State Significant Development Application Number SSD-88511459
33-37 Herbert Street, St Leonards**

I am writing to you regarding the State Significant Development Application Number SSD-88511459 at 33-37 Herbert Street, St Leonards; Council's submission is provided in **Attachment 1**. Council has provided a set of conditions in **Attachment 2** to ensure that the engineering, design, and public domain is achieved to the highest possible standard.

The subject site is located within the Artarmon Industrial Area, a strategically important industrial precinct that supports a broad range of industries such as logistics and warehouses, education, technical services and medical-related services associated with Royal North Shore Hospital and several nearby health and education facilities. The importance of this industrial precinct is reinforced by the recently exhibited draft *Statewide Policy for Industrial Lands*, published by DPHI, which identifies the subject site and the broader Artarmon Industrial Area as regionally significant industrial land.

Council acknowledges the urgent need for housing and supports the delivery of housing in well-located areas that are supported by appropriate infrastructure. Council also recognises that housing and appropriate employment-related uses can potentially be delivered in this location. However, the application has not provided sufficient reasoning or evidence to justify the replacement of industrial-related uses with commercial and retail uses as part of the proposed shop top housing development and concurrent rezoning.

In light of the draft *Statewide Policy for Industrial Lands* and the *Summary of the Housing Delivery Authority 12 Month Review*, Council requests that consideration be given to the following issues entailed in Council's submission (Attachment 1):

- Justification for the balance of housing and employment land proposed.
- Need for flexible non-residential floor space design.
- Protection of industrial land through appropriate planning mechanism.
- The provision of permanent affordable housing.
- Shortage of public infrastructure delivery.
- Excessive amount of car parking.
- Future shared cycleway and need for upgraded public domain.

- Waste management issues to be resolved.

Council's submission also raises matters relating to public domain design, engineering, stormwater management, waste management, with the aim of achieving the best possible design outcomes for the public domain and the wider community.

Should you have any question in regards this letter and the attached, please contact Christopher Nguyen – Strategic Planner on (02) 9777 7646.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Dyalan Govender', with a stylized flourish at the end.

Dyalan Govender
Manager of Strategic Planning