



1 August 2024

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

SSD 67175465
JD6 (P&E)

ATTENTION: Mr J Martinez, Planning Officer
Infill Affordable Housing

STATE SIGNIFICANT DEVELOPMENT APPLICATION 67175465
APPLICANTS: CBUS PROPERTY, GALILEO GROUP, PLATFORM PROPERTY SERVICES

Dear Sir,

I refer to the recent public exhibition of the application and advise that following a review of the documents provided Council objects to the approval of this development proposal.

In summary, the grounds for objection are:

- The site has already benefited significantly by recent uplift of height and FSR standards following the completion of a planning study and parallel Planning Proposal processes enabled by the Department of Planning. This represented a very significant increase in height which was underpinned by careful planning and consultation. The increases proposed are unplanned and ad hoc given the comprehensive planning undertaken by Council.
- The 15-year limit on housing being retained as affordable is most inappropriate, being a temporary solution to what will be an ongoing problem for Sydney, allowing the affordable housing component to be traded on the open market after that time. In the current housing climate, it is regrettable that a 30% FSR bonus for the provision of 67 affordable housing units could be contemplated. This will only perform an affordability role for 15 years. This is short sighted and inconsistent with the stated objectives of all levels of government in tackling the affordability crisis in Sydney and more widely.
- The amount of parking proposed is excessive, especially when considering the site is a leisurely walk to both North Sydney and Victoria Cross Metro Stations, a new "game-changing" transport link for Sydney, according to the NSW Government.
- The number of cars capable of being parked on the site will increase traffic congestion in the area, exacerbating conditions expected to worsen because of Warringah Expressway upgrading and the dramatic growth of new and intensified development occurring in the precinct.
- Urban design can be improved, for built form by including an increase of the above podium setback of Building A, which accommodates the built-to-rent affordable housing, legibility of entries, increasing building separation, reconsidering the porte-cochere off Walker Street and loading bay off Hampden Street, and providing equitable access to recreation facilities for the affordable housing.
- The clear difference in design approach between the build to rent and market-based housing defining the former as a clear poor cousin to the latter, despite attempts to unify the buildings on the ground plane. The design quality of Building A compared to Building B1, in terms of finish, materials and potentially environmental performance should be improved.
- Potential access difficulties for service (garbage collection) and emergency service vehicles.

- Reduction of on-street parking and potential traffic flow inefficiencies.
- The green travel plan submitted is inadequate and does not take full account of all public transport facilities and the evolving active transport network.
- Waste management arrangements do not comply with Council DCP requirements.
- The loss of 33 mature trees cannot be supported.
- The submitted arboriculture report failing to address the impacts of the loss of existing trees, tree canopy pruning and impacts thereof.
- No apparent assessment of the impact of the proposal on existing wildlife.
- The notification area used by the Department was inadequate as it did not include properties on the eastern side on Miller Street between Berry and McLaren Streets which overlook the site and have potential to lose valuable views to the east.

Detailed Submission

Detailed commentary follows, in which several positive aspects of the proposed development are canvassed, in addition to reasons for objection. This submission has been prepared with input from across Council's departments, and addresses:

- Strategic Planning,
- Urban Planning and Design,
- Heritage,
- Social Impact and Affordable Housing,
- Traffic and Transport, and
- Waste Management

Development-specific and standard conditions will be recommended, should the application be recommended for approval, for the following matters in addition to the above issues:

- Development and Infrastructure Engineering,
- Landscape and Tree Protection,
- Environment and Health, and
- Public Art.

Accordingly, Council is prepared to assist the Department with preparing detailed conditions of consent, should a positive recommendation be made to the Independent Planning Commission.

Background

This site has a lengthy planning history, beginning with several planning proposals, all of which were either rejected or objected to by Council, over the last decade. A planning proposal was approved by the Department following due consideration and amendments made to controls for the site on 30 July 2021, allowing an increased height and floor space ratio maximum for the site.

In July 2022, Development Application 197/22 was lodged with Council for an apartment complex of three buildings containing 171 units. A deemed refusal appeal was later filed in the Land and Environment Court, which was discontinued in November 2023.

Pre-application public submissions received by Council

Before the formal exhibition period commenced Council received seven submissions from residents of the site's locality, mainly from the Century Plaza building, 71 Walker Street, which is directly south of the site.

These submissions responded to the applicant having corresponded with them advising that the last day for submissions was 23 February 2024 (whether residents were advised that further opportunity to formally comment on the proposal is unknown).

In summary, residents' concerns related to:

- Planning proposals not being supported by Council in the past,
- The manner in which early advice of the proposal was received,
- The development being "out of scale," "far more intrusive and out of character" than the previous proposal (DA 179/22, the subject of a discontinued appeal), and having unacceptable amenity impacts,
- Affordable housing impairs views of existing residents west of Walker Street,
- North Sydney has contributed enough to Sydney's need to densify around transport hubs,
- The proposal being an overdevelopment of the site,
- Cumulative impact of this and nearby developments on traffic and parking in the area, including pedestrian safety, especially for the many school students who use the footpaths of the locality,
- Privacy and overshadowing impacts on outdoor amenities, including a swimming pool, of the apartments at 71 Walker Street, directly adjacent to the site's southern boundary,
- Government buying back the site, to provide open space and restore the older (formerly heritage listed) flat buildings on Walker Street,
- The amount of affordable housing proposed is a "token gesture," the developer's key aim is to maximise profit.
- The applicant having not adequately addressed key issues is grounds for refusal.

Preliminary Notes

Except as discussed below, the proposed development performs satisfactorily in response to applicable planning instruments and the Apartment Design Guide. It is noted that development control plans are excluded from being applied to State significant development proposals. In these circumstances, the North Sydney DCP 2013 has been used not as a suite of assessment controls, rather it has been used as a guide, to allow an informed and well-considered evaluation of the proposal.

Timing of Submission

Before preparing this submission, the Department of Planning Housing and Infrastructure advised that no extension would be granted, so this submission was made on the due date.

The Department also advised that the elected Council may make a supplementary submission following formal closure of the exhibition period. The Council will consider this application at its meeting of 12 August 2024. Should Council resolve to make any additional comments, they will be included in a supplementary submission as soon as practicable after the Council meeting.

STRATEGIC PLANNING

Key strategic planning and policy reasons for objecting to the application:

- The site has already received a significant uplift in height and FSR following several planning proposals and exhaustive review of same. Previous proposals and the final scheme, approved by the Sydney North Planning Panel were either refused by or objected to by Council.
- Accordingly, the subject application seeking to exploit additional floor space ratio and to a lesser extent height to achieve a greater yield than may have been otherwise possible is objected to.

- This is contrary to locally responsive place-based strategic planning principles, developed by Council in consultation with the community, and is not without negative cumulative impact.
- The outcome of the planning proposal process that led to the current planning controls should be regarded as the maximum development outcome for the site based on sound planning principles.
- Exploiting bonuses as proposed erodes community trust and understanding of the planning process and counters transparent community participation principles.

URBAN PLANNING AND DESIGN

Council's urban designers have reviewed the project having focussed on proposed built form and its consistency with DCP guidelines:

Podium

The site-specific DCP provisions require a continuous podium height of two storeys to Walker Street and 2-3 storeys to Hampden Street. Podiums frame public space, ameliorate wind impacts, promote human scale and contribute to the scale and character of streets.

The proposal incorporates a three-storey podium expression to Walker Street and Hampden Street. Despite non-compliance with the DCP control, the proposed podium is positively informed by the scale and rhythm of surrounding built form, through its incorporation of vertical proportions.

Further, the transitional podium expression aligns with the architectural datums of adjacent buildings along Walker Street and Hampden Street, reinforcing a human scale to the street.

The three-storey podium element is supported.

Above Podium Setback

The DCP requires above podium setbacks of 3.0m to Walker Street and Hampden Street to manage the scale and bulk of buildings and ensure it achieves comfortable public domain conditions for pedestrians.

The proposal provides an above podium setback of 850mm to Building A and 270mm to Building B1. Despite non-compliance with the DCP, the serrated articulation to Building B1's tower and podium helps to visually mitigate the scale and bulk of its basic shape. Its corner location allows some flexibility in a reduced above podium setback to Building B1 and is therefore considered acceptable.

In contrast, Building A (the 12-storey affordable rental housing building) presents a continuous podium and tower form to Walker Street. The lack of above podium setback, particularly to the street, increases its perceived bulk and mass, which is not in keeping with the desired street character. Increasing the podium setback to 3.0 metres on the western façade of Building A along Walker Street is recommended to enhance the human-scale and quality of the streetscape.

Building Separation

Adequate building separation distances are important to achieve reasonable levels of external and internal visual privacy. Part 3F of the Apartment Design Guide (ADG) recommends minimum separation distances from buildings to the side and rear boundaries.

Buildings A and B1 provide varying separation distances, some of which do not meet the ADG criteria. While angled windows and blank walls are proposed to address these non-compliances, it is crucial that this approach is undertaken with careful consideration. The ADG's separation provisions are minimum standards, and numerical compliance is generally expected. In addition to addressing privacy concerns, appropriate separation distances ensure adequate light, space, and sky access in a dense urban environment.

Compliance with ADG requirements is recommended.

Main Entrances into Buildings

The proposed main entries to Buildings A (affordable housing) and B1 (market housing) are located along Walker Street. Building A features an entry that does not directly front the street, potentially causing confusion for visitors. Building B1, on the other hand, utilises layered entry sequences, which obscures the clarity and legibility of its primary entry from the street.

Additionally, the transition between public and private areas at the front of Building B1 lacks clear delineation. Creation of clearly defined and legible entrances for both buildings is required, to ensure a distinct separation between public and private areas to enhance accessibility and ease of navigation for all users. This would improve wayfinding, create a more welcoming environment, and reduce the potential for conflicts between different user groups.

Vehicular Entry

Proposed vehicular entries include a shared zone, or porte cochere, in the central area along Walker Street for pick-up/drop-off, deliveries, and turnarounds, as well as a driveway and loading bay off Hampden Street, for service vehicles.

The design of the porte cochere undermines the public domain and detracts from the civic qualities of this central space. Furthermore, it conflicts with the entrance to Building B1, creating potential safety and accessibility issues. To enhance the pedestrian environment and better utilize the area for waiting and informal gatherings, it is recommended to reconsider the vehicle turning layout and provide a kerbside drop-off in place of the proposed configuration.

Affordable Housing Access to Landscaped Open Spaces

Building A, designated as the affordable housing component, offers fewer amenities compared to the market housing, Building B1. While concentrating affordable housing for better management is a reasonable approach, this rationale does not fully justify the disparity in amenities provided.

The central communal open space includes a landscaped area with various recreational zones. However, access to these amenities is restricted to residents of Building B1. Building A residents can appreciate the landscaped areas visually but do not have direct access to them, limiting their ability to enjoy landscaped open spaces available in the development.

Further Comment on Urban Design

Before the foregoing critique was made, during earlier stages of the process for preparing the subject application, Council officers observed that the affordable housing building's exterior (Building A) was the 'poor cousin' of Building B1, the apartments of the latter intended for sale on the open market. These earlier iterations were for a simpler, less environmentally responsive design, exhibiting a lack of articulation in the facades and as noted above, poorer access to planned resident amenities.

The montage below illustrates the contrast between the form of both podium and tower in Building A (to the right) and Building B1 (to the left). What seeks to unify the two buildings is the use of the stamped materials in the same colour at podium level and hard and soft landscaping of the ground plane. Deeply recessed balconies in Building A should provide adequate summer-afternoon shade (also affected by other buildings to the west of Walker Street), whereas orientation and materials provide arguably more effective environmental performance for the western façade of Building B1. The sawtooth façade of Building B1 and the flat face of Building A still mark them as distinct from one another, and the recommended above podium setback increase to 3.0m will assist in softening the appearance, bulk and scale of Building A.



View of the proposal from Walker Street south-west of the site (Rothelowman Architects)

Overshadowing of Dorris Fitton Park

A review of the provided shadow diagrams indicates that this proposal will not overshadow Dorris Fitton Park during the critical times between 12.00 pm and 2.00 pm from the March equinox to the September equinox and thus complies with clause 6.3.2 of NSLEP 2013. This issue should be carefully reviewed by the Department in its assessment of the proposal.

URBAN DESIGN RECOMMENDATIONS

1. Increase to 3 metres the above podium setback provided to Building A's western façade.
2. The design be reviewed to clarify and make more legible and useable, the main entrances to Buildings A and B1, and clearly delineate between public and private spaces.
3. For reasons outlined above and other reasons described elsewhere in this report, the porte cochere must be replaced with an on-street kerbside delivery and pick-up space and the vehicular entry and the loading bay on Hampden Street must be revised.
4. Consideration being given to enhancing the amenity provision for Building A, including equitable access to communal recreational spaces in Building B2, to ensure parity within the development, overall.
5. Increasing building separation distances to comply with the Apartment Design Guide.

HERITAGE

Heritage Status and Significance

The subject site is not heritage listed, nor is it located within a heritage conservation area.



Map showing location of heritage items (brown) and the location of the subject site (dotted in blue).

Source: Weir Phillips Heritage and Planning Heritage Impact Statement , Page 6, 2024

The subject project is located within the vicinity of the following heritage items.

- Stone Wall, Walker Street (near Hampden Street) (I0996)
- House, 144 Walker Street, North Sydney (I0984)
- House, 146 Walker Street, North Sydney (I0985)
- House, 148 Walker Street, North Sydney (I0986)
- House, 150 Walker Street, North Sydney (I0987)
- Simsmetal House, 41 McLaren Street, North Sydney (I0889)
- House, 2 Hampden Street, North Sydney (I0840)
- House, 4 Hampden Street, North Sydney (I0841)
- House, 6 Hampden Street, North Sydney (I0842)
- House, 8 Hampden Street, North Sydney (I0843)
- House, 10 Hampden Street, North Sydney (I0844)
- House, 12 Hampden Street, North Sydney (I0845)
- House, 14 Hampden Street, North Sydney (I0846)
- House, 185 Walker Street, North Sydney (I0988)

Heritage Impact Assessment

The following heritage provisions are of relevance to the assessment of the application:

NSLEP 2013 Clause 5.10

An assessment of the proposal, with reference to the following Clause of the NSLEP 2013 has been made:

5.10 Heritage Conservation

(1) *The objectives of this Clause are as follows:*

- (a) *to conserve the environmental heritage of North Sydney*
- (b) *to conserve the heritage significance of heritage items and conservation areas, including associated fabric, settings and views*

There will be no physical works to the nearby heritage items. The double rail fence and central vegetated island in Hampden Street will be retained. The setting of the heritage-listed Hampden Street terraces

and the dwellings 144, 146, 148 and 150 Walker Street will be impacted. These heritage items are only one or two storeys in scale while the proposed development will be 4, 12 and 30 storeys in height. The site is subject to three height standards under the NSLEP (North Sydney Local Environmental Plan) that already allow for increased storey height that will over-scale the heritage items. The proposed additional height in this application will therefore have little additional accumulative impact on the heritage items. The proposed 30 storey tower will be angled so it addresses the corner at a splay with broken masses that will be sympathetic to the rhythm of the nearby heritage items. The proposed setbacks of 2.4m, 5.1m and 9.9m from Hampden St are considered to be adequate particularly given that there is also physical separation by the split in the road and the central vegetated island.

The proposed setbacks of 2.15m, 4.85m and 8.70m from Walker Street are also considered to be acceptable as again Walker Street is a split-level road, and the building is highly articulated with a series of stacked masses that will ameliorate the impact of the difference in scale between the tower and the heritage items on Walker Street. The top of the podium of the 30-storey tower will be similar in height to the eaves line of the heritage houses on Walker St. The proposed landscaping will also be at street level whilst the existing landscaping is set below the road. This is a positive heritage outcome.

NSDCP 2013

Objectives

- O1** *Ensure that new work is designed and sited so as to not detrimentally impact the heritage significance of the heritage item and its setting.*

The northern setback of Building B2 requires softening with landscaping as it will be hardened by the two substation kiosks, the stormwater pit and driveway. The photomontage below does not adequately portray the likely outcome.



View from Hampden Street looking south-east towards the proposed gym building. The substation kiosks and extent of hardscape are not clearly shown.

No objection is raised to the proposed materials as described by Rothelowman on page 77 in the Design Review Report. It is recommended that they be resubmitted as part of the architectural package.

DCP Provisions

- P1 Respect and respond to the curtilage, setbacks, form, scale and style of the heritage item in the design and siting of new work.*

The setback of the eastern Building B2 is on the boundary. It is recommended that this be amended to allow for a landscape buffer to ameliorate the visual impact of the scale of the eastern wall of the building.

- P2 Maintain significant public domain views to and from the heritage item.*

Compliant.

- P3 Ensure compatibility with the orientation and alignment of the heritage item.*

The orientation of the 30m tower will differ from the orientation of all nearby heritage items. However, no objection is made as the articulated form and splayed design will remove the perceived bulk from the corner of Walker and Hampden Streets.

- P4 Provide an adequate area around the heritage item to allow for its interpretation.*

Compliant.

- P5 Retain original or significant landscape features that are associated with the heritage item or that contribute to its setting.*

The landscaped space in the centre of Hampden Street provides a landscape setting to the Hampden Street terraces and will be retained.

- P6 Protect and allow interpretation of archaeological features (as appropriate and relevant).*

The application was referred to the Aboriginal Heritage Office, who confirmed that the site is unlikely to contain relics of cultural heritage significance to Aboriginal people. In the event of a relic being found during development, it would be protected under provisions of the *National Parks and Wildlife Act 1974*.

HERITAGE RECOMMENDATIONS

1. Increase the side setback on the eastern boundary of Building B2 to allow for a landscape buffer.
2. Improve the public presentation of the northern front setback of Building B2 that is opposite the Hampden Street heritage items as the two substation kiosks, stormwater pit and driveway entry will result in a large area of hardscape rather than a soft landscaped setting.
3. The materials schedule on Page 77 of the Design Report being added to the architectural plans so it is included in the stamped plans should development consent be issued.

SOCIAL IMPACT AND AFFORDABLE HOUSING

A summary of key points and recommendations is provided below.

- 11 units are to be dedicated to Council as affordable rental housing, in accordance with the Planning Agreement applicable to the site. These are 4 x studio apartments, 4 x 1 bedroom and 3 x 2 bedroom apartments.

- These apartments are in Building A with the 67 affordable rental units proposed, which fully exploit the Housing SEPP's floor space ratio bonus.
- The overall mix of housing provided is appropriate given the range of household types in the North Sydney Council area, which has higher numbers of couples without children and lone person households, compared to the Greater Sydney region.
- The adaptable housing mix is consistent with Council's DCP guidelines, which require at least 20% of units to be adaptable. 48 units are adaptable across the development which is 20% of the total.
- Regarding loss of affordable housing, the social planner accepts the application's proposal for providing the number and types of dwellings to be affordable rental housing, noting that three Tier 1 Community Housing Providers have provided letters of support for the application, stating that the proposal "... will provide much needed affordable rental housing in North Sydney."

Notwithstanding the discussion above, in the current housing climate, it is most inappropriate to provide for a 30% FSR bonus for the provision of 67 affordable housing units which will only perform this affordability role for 15 years. This is short sighted and inconsistent with the stated objectives of all levels of government in tackling the affordability crisis in Sydney and more widely.

SOCIAL IMPACT AND AFFORDABLE HOUSING RECOMMENDATIONS

1. That the applicant follows the guidance provided by the submitted qualified Access Consultant's Report as conditions of the development. Furthermore, that the applicant provides an additional assessment to be submitted with the relevant Construction Certificate application, to demonstrate compliance with *the Disability Discrimination Act 1992* and *Disability (Access to Premises - Buildings) Standards 2010*.

(Reason: To comply with anti-discrimination laws and maximise inclusion for people with disabilities)

2. That the applicant provide for community housing in perpetuity, the following apartment types and numbers:

Apartment Type	Number
Studio	4
1 Bedroom	4
2 Bedroom	3

(Reason: Compliance with the Planning Agreement applicable to the subject land)

3. That the applicant undertakes an open tender process with Tier 1 Community Housing Providers (CHP) operating in NSW able to apply to manage the community housing project.

(Reason: To ensure that the affordable housing stock is managed appropriately)

TRAFFIC AND TRANSPORT

In summary Council's senior transport engineer advises as follows:

- Parking is compliant with Transport for NSW Guidelines.
- Adequate accessible car and motorcycle parking and bicycle storage is proposed.
- Waste collection arrangements are unacceptable and should allow for entering and leaving the site in a forward direction.
- Fire and Rescue NSW should be consulted regarding the ability of fire truck to make a three-point turn on streets adjacent to the site.

- Road safety measures are acceptable, except as discussed below.
- The Green Travel Plan submitted with the application lacks detailed initiatives, stakeholder engagement provision and does not allow for user-feedback, for continuous improvement.

Further Observations

Number of Car Parking Spaces

The number of car parking spaces proposed (which is consistent with the Housing SEPP's minimum requirements) exceeds the maximum specified by Council's DCP, which was adopted last year. New parking rates were devised based upon detailed analysis of likely private-vehicle travel demand, resulting from the planned Metro extension from Chatswood to Sydenham (planned to be opened in August 2024), Warringah Freeway upgrades and likely future development in 'highly accessible areas', being locations within walking distance of heavy rail and Metro train stations.

Emergency Services Access

Fire and Rescue NSW and the NSW Ambulance Service were consulted during the appeal for the previous development application. Both declined to comment, as they reserve their assessment until construction certificate stage.

Vehicle Access

There are three separate vehicle access points, the basement entry and exit ramps off Walker Street in the site's southwestern corner, the porte cochere for resident and small service vehicle delivery and drop off to the north of the basement ramps, and the open loading bay off Hampden Street.

Four vehicle–pedestrian conflict points would be introduced to a high-use pedestrian path on Walker Street, the use of which will increase as development in the neighbourhood further densifies.

The loading/unloading arrangements in Hampden Street are likely to impact neighbourhood and residential amenity of the proposed development and adjacent housing in Hampden Street. Amenity would be affected too, if compliant garbage collection was provided, with vehicles turning and parking on the street while bins were emptied from a bin holding area no more than 2.0m from the kerb, as the DCP requires.

The number and width of the vehicle entry/exits result in the loss of on-street parking. Aerial imagery indicates there are up to 18 parking spaces on Walker and Hampden Streets opposite site frontages. The proposed ground floor plan shows only seven spaces will remain.

TRAFFIC AND TRANSPORT RECOMMENDATIONS

1. The number of car parking spaces should be reduced to no more than the maximum permitted by the North Sydney Development Control Plan 2013. This would be consistent with Council's and the NSW Government's integrated transport and land use policies and investment, to reduce private vehicle travel, improve and promote public transport, reduce traffic congestion and pollution, and make access in and around Sydney easier, safer, more comfortable and equitable.
2. A condition being applied should consent be granted, for a Green Travel Plan to be submitted with the final Occupation Certificate, prepared in accordance with the methodology provided in the submitted traffic impact assessment report.
3. Vehicle access arrangements are unacceptable as discussed above and should be improved before consent is granted.

WASTE MANAGEMENT

According to the submitted waste management plan:

Prior to collections, the Building Manager/Caretaker will be responsible for transporting the bins from chute discharge rooms and each residential level to the allocated collection point located on the basement level 1. The Building Manager/Caretaker is also responsible for ensuring that the bins are adequately arranged for an efficient collection. It is recommended that an additional 1100L service bin be placed under the chute in Building A to collect discharge while the other bins are being serviced. It is the responsibility of the caretaker to ensure that the loading area is clear of any vehicles or obstructions prior to waste collection.

To service the bins, a council collection vehicle will utilise the site loading area to turn around before parking at the end of Hampden Street adjacent to the bin holding room. Waste collection staff will access the bin holding room and service the bins via a collect and return

arrangement. Once servicing is complete, the Building Manager/Caretaker will return the bins to their operational location to resume use.

Use of the loading bay by Council vehicles to make a three-point turn to exit Hampden Street is not compliant with Council's DCP guidelines, or current contractual arrangements for garbage collection, which do not allow Council staff and vehicles to enter private property to collect waste materials.

That State significant development does not need to be consistent with DCP controls, is noted. However, approval should not be granted to a scheme that would contravene current business contracts and procedures established to ensure safe work practices.

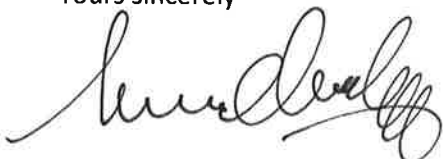
Objection is raised to the current proposed collection method, and if approval is contemplated the developer should liaise with Councils environmental team to ensure an acceptable outcome.

Conclusion

In conclusion, Council appreciates the opportunity to make this submission and the prior consultation of the applicant with Council's staff. Further involvement in project planning and engagement is positively anticipated, with amendments recommended to be made to the proposal as detailed herein, to resolve Council's grounds for objecting to the application.

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



MARCELO OCCHIUZZI
DIRECTOR, PLANNING & ENVIRONMENT