



12 December 2024

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

SSD 67175465  
JD6 (P&E)

ATTENTION: Manwella Hawell, Planning Officer

**STATE SIGNIFICANT DEVELOPMENT APPLICATION 61000021**  
**146 ARTHUR STREET NORTH SYDNEY**  
**BUILD-TO-RENT PROJECT**  
**APPLICANT: AQUALAND PROJECTS PTY LTD**

Dear Secretary,

I refer to the recent public exhibition of the State Significant Development Application proposing a build to rent development at 146 Arthur Street North Sydney. Following a review of available documents Council objects to the approval of this development proposal, in the strongest possible terms.

In summary, the grounds for objection are:

- The development should not be approved, due its irreversible negative impacts on North Sydney's role as a key economic, social and cultural centre of Global Sydney. The aggregate impact of approving this project and others like it, currently in the pipeline, must also be considered.
- Economic and social impact assessment submitted with the application are inadequate, not having properly addressed the Secretary's Environmental Assessment Requirements.
- An affordable housing component should be provided and maintained in perpetuity, or for at least 15 years, to be managed by a community housing provider.
- Urban design improvements are required to improve amenity and safety of Little Walker Street, reduce impacts of the number and location of vehicle access points, provide a pedestrian link from east to west through the site and improve the proposal's physical, visual and accessibility relationships with Doris Fitton Park, adjacent to the site's northern boundary.
- Architecturally, built form and detail does not reflect or signify the building's intended use, although the building's height and shape are compatible with the North Sydney CBD's planned and emerging skyline.
- Replacement trees in Arthur Street should be considered.
- Although the project takes appropriate advantage of the site's proximity to public transport, this would be complemented by a revised, more detailed, and better-targeted Green Travel Plan and facilitating car sharing by providing suitable spaces in the car park. Access issues for construction and operational phases also require further consideration.
- Waste management facilities and management require revision.

## **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 the following matters:

- Strategic Planning,
- Urban Planning and Design,
- Affordable Housing,
- Heritage,
- Tree Protection,
- Traffic and Transport, and
- Waste Management

Draft conditions will be recommended and prepared, should the application be recommended for approval. These will address matters discussed in this submission as well as those listed below.

- Development and Infrastructure Engineering,
- Environment and Health, and
- Public Art.

### ***Assessment 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 by the due date. The Department's advice responded to an enquiry regarding the formal exhibition period not allowing a sufficient period for evaluation of and reporting the matter for the elected Council's consideration of the project at a formal meeting.

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 a meeting early in 2025. Should Council resolve to make any additional comments, they will be included in a supplementary submission as soon as practicable after the Council meeting.

### ***Prior consultation***

In accordance with the Secretary's requirements, the applicant has consulted with Council during the application's preparation.

## **COUNCIL'S ASSESSMENT**

### ***STRATEGIC PLANNING – ECONOMIC AND SOCIAL IMPACTS***

Section 4.39 of the Environmental Planning and Assessment Act 1979 and section 190(2) of the Regulations require a State Significant Development Application to have regard to both the '*State Significant Development Guidelines - March 2024*' and the '*State Significant Development guidelines – preparing an environmental impact statement - July 2022*'. Section 3.3 of the guidelines make specific reference to the requirement to consider

strategic context. It is Council's position that the State Significant Development, as submitted, fails to satisfactorily consider these statutory requirements.

### ***Strategic Context***

The site is located less than a 300m walk from the newly opened Victoria Cross Metro and is centrally located within North Sydney Commercial Centre. In 2018, a Council initiated amendment was made to the North Sydney LEP, that assigned significantly increased building heights to help accommodate identified jobs targets set by the State Government for North Sydney. The market has responded positively to these amendments through the lodgement and approval of several large-scale commercial office developments.

In both of the State Government's overarching strategic policies, being the *Greater Sydney Region Plan – A Metropolis of Three Cities* and the *North District Plan*, North Sydney is identified as a Metropolitan Centre which is the highest order centre forming part of the Eastern Harbour City as part of global Sydney.

This status is reflected in the (State Government endorsed) North Sydney Local Strategic Planning Statement with a clear direction to retain the CBD's commercial core zoning to ensure that current and future employment capacity is provided for. Residential development is not permitted nor supported within the (relatively compact) existing Commercial core area.

### ***Economic and social impacts***

In issuing the Planning Secretary's Environmental Assessment Requirements (SEARs) an additional assessment requirement was issued (dated 22 July 2024) to:

- *Provide an economic impact assessment which assesses the economic impacts of the proposed residential uses in the North Sydney Commercial Core. The analysis must take into consideration the existing provision and demand for retail and/or commercial uses on the site and within the commercial catchment area.*

The economic analysis submitted with the proposal has not, in Council's opinion, adequately responded to the SEARs in that it fails to have adequate regard to the broader economic impact of the proposal on the longer-term viability and strength of the North Sydney CBD. Considerable analysis is provided on the current site and market conditions for office development and the attractiveness of converting the site to a residential use under the current market. This is not a meaningful nor adequate economic impact assessment as required under the SEARs.

North Sydney Council area's Gross Regional Product was \$23.37 billion year ending June 2023.

An analysis of the value added by industry sectors in the North Sydney Council area in 2021/22 shows the three of the largest industries were:

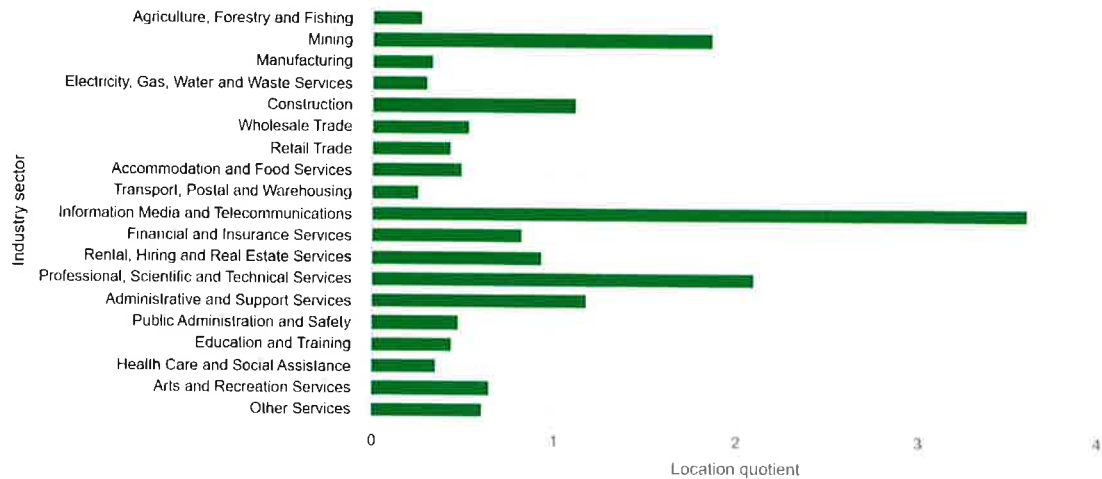
- Professional, Scientific and Technical Services (\$5,828 million or 27.0%),
- Information Media and Telecommunications (\$4,421 million or 20.5%),
- Financial and Insurance Services (\$2,592 million or 12.0%)

In combination, these three industries accounted for \$12,841 million in total or 59.6% of the total value added by industry in the North Sydney Council area. The comparison to Greater Sydney is compelling, reinforcing North Sydney's important role in the Eastern Economic Corridor (refer graph below).

## Location quotient by industry sector 2022/23

Value Add

■ North Sydney Council area relative to Greater Sydney



Source: National Institute of Economic and Industry Research (NIEIR) ©2023 Compiled and presented in economy.id by .id (informed decisions)

.id informed decisions

The existing commercial floorspace on the site (categorised as 'B' grade) and that the current financial and market conditions mean it is less viable is understood, either in its current form or redeveloped, when compared to a residential prospect. With the progression of several large scale (residential) planning proposals surrounding the precinct, along with the recent Crows Nest TOD rezoning and upcoming mid-rise housing reforms, residential capacity is adequately provided for within the North Sydney LGA.

If re-developed to its full potential under the current NSLEP planning controls as a commercial development the site has potential to contribute approximately 2,000 jobs to North Sydney with a significantly greater long term annual benefit to the broader economy. According to the National Institute of Economic and Industry Research (NIEIR) the average worker productivity figure across the above three predominant sectors described above in North Sydney is \$244,000 per annum. Workers in these sectors typically occupy office accommodation and have, on this site, the potential to contribute some \$488million per annum to the broader economy.

The EIS documentation provided focuses too heavily on current and anticipated short term market conditions. It does not consider the catalytic effect of the recent opening of the Metro in this context nor the accumulative (detrimental) impact on the economy if this conversion from commercial to residential land use proceeds. It is noted that several other sites in the North Sydney CBD have also either sought SEAR's or expressed an interest in doing so.

Notwithstanding the permissibility available under State Environmental Planning Policy (Housing) 2021 and the current prevailing economic and financial conditions, the longer term strategic and economic considerations outweigh the relative merits of this proposal and the proposed land use is strenuously objected to.

## AFFORDABLE HOUSING

### Build to Rent Proposal

The applicant states (submitted Social Impact Assessment, p.45):

*"Unlike traditional rental properties, where tenants frequently come and go without ever building connections with one another, Build to Rent developments actively foster a sense of community and belonging. With shared amenities such as communal lounges, fitness centres, rooftop gardens, and social*

*spaces, residents have ample opportunities to interact and connect with their neighbours. This sense of community is often particularly appealing to young professionals, students, and individuals who are new to an area and looking to build social connections."*

The "Built to Rent" (BTR) concept, to increase the supply of residential properties that become available on the private rental market is commendable. North Sydney has all the antecedents to being a successful area to undertake BTR projects, given its proximity to major facilities, local amenities, health, educational, bushland, parks, open spaces and transport links.

In the E2 Commercial Centre zone, BTR housing must be maintained as rental housing in perpetuity. For the reasons given above, BTR projects in the E2 zone, including North Sydney's CBD, should be excluded from the Housing SEPP's Chapter 3, Diverse Housing, Part 4, Build to rent housing, due to their significant potential to disrupt and compromise economic and social objectives of key Government and Council strategies.

For this and other projects, as presently enabled by the SEPP, none of the housing supplied must be affordable as defined by the EP & A Act and the Housing SEPP.

Should the project, a large scale and in all likelihood a highly profitable venture, clearly aimed at the 'luxe' end of the property market, be recommended for approval and ultimately approved, it will be at the expense of losing a finite resource – land in a well-established business zone in a globally significant, economically invaluable district.

As a matter of principle and due to the highly likely deleterious social and economic impacts of the development, a proportion of the housing should be maintained as affordable rental housing in perpetuity, in this and other BTR schemes in commercial centre zones.

As discussed below, the North Sydney area was once a significant provider of affordable rental accommodation, and this is no longer the case. The fact that BTR projects are permitted to compromise key NSW Government and Council economic strategies strongly suggests that proposals such as and including this one should be required to offset their potentially irreversible economic impacts, in a socially responsible and beneficial manner.

### ***Council's role in Affordable Housing***

Affordable rental housing is defined as being housing which very low or low to moderate-income households must spend no more than 30% of their household income on rent. Council has concerned itself with the need for affordable housing through several measures, including regularly engaging Judith Stubbs and Associates to undertake an Affordable Housing Strategy and Reviews of the Housing Market (2008, 2013, 2015, 2017, 2019, 2022). There is both a positive obligation focus of producing more low-cost housing as well as mitigating against the loss of affordable housing.

Stubbs's 2019 Report found that:

"Since the affordable housing program began in 1984, at least 2,400 affordable bed spaces have been lost in the LGA".

She further noted that:

"Considering only the maintenance of 2016 levels of affordable housing within North Sydney LGA, the following targets will need to be met between 2016 and 2036:

- An additional 160 social housing dwellings (1.6% of projected additional dwellings)
- An additional 6,200 affordable rental and purchase dwellings (62% of projected additional dwellings)
- An additional 136 beds in boarding houses" (p.9).

### ***Conclusion***

Demolition of the current 12-storey commercial office building to be replaced by a multi-storey residential development of over 42-46 stories is not supported, as detailed above. However, should approval be granted, such an approval entails significant potential financial gain for the developer at the expense of the community losing an invaluable economic (and hence social) resource, the proposal lends itself to incorporate affordable

housing. Ideally, 15% of the total number of dwellings should be for 'affordable housing' and dedicated in perpetuity. Failing this, the affordable rental should be protected for at least 15 years, the period the Government has deemed suitable to increase the supply of diverse *and* affordable housing.

### **AFFORDABLE HOUSING RECOMMENDATION**

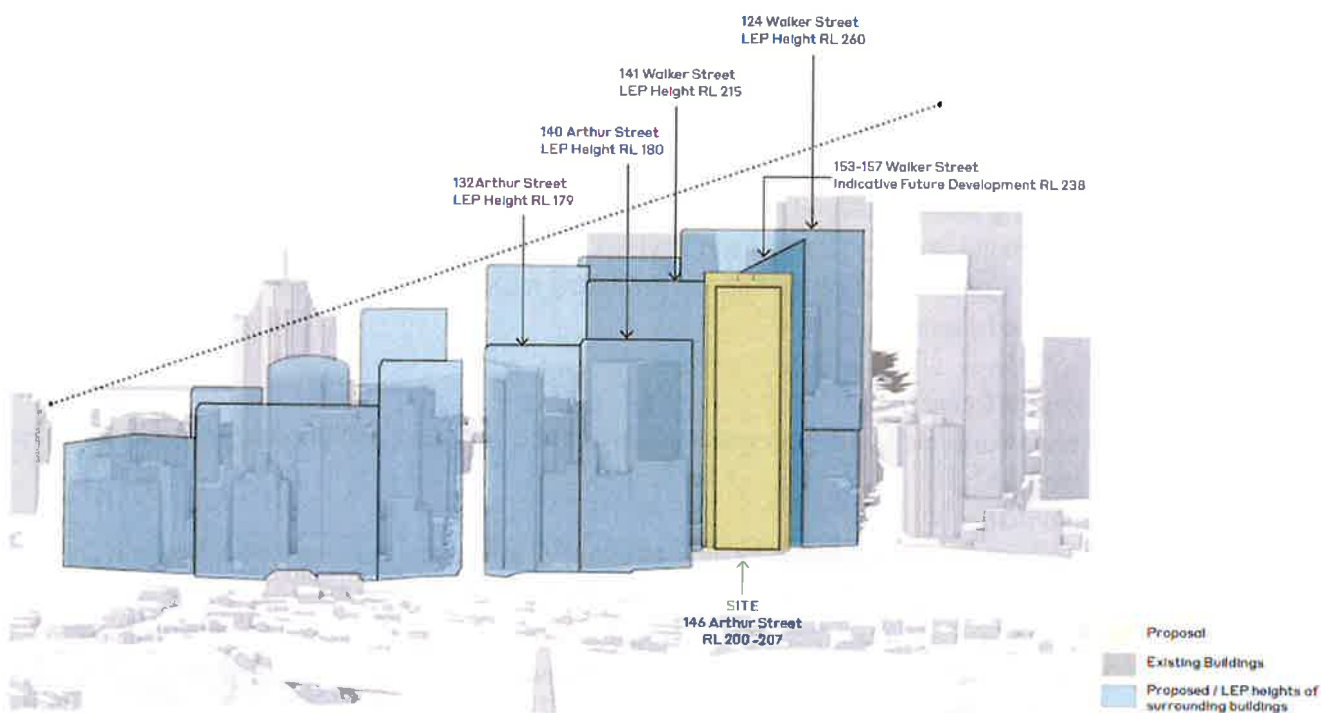
1. ***Should the development be approved, the applicant shall provide a minimum of 15% of the total number of dwellings for 'affordable housing', in perpetuity, or for at least 15 years, to be managed by a Tier 1 Community Housing Provider (CHP) operating in NSW.***

### **URBAN PLANNING AND DESIGN**

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

#### ***Architectural scale, form and detailing***

The proposed tower capitalises on the local height control (RL 188, NSLEP 2013) and the height and floor space bonuses permitted, achieving three or four additional habitable levels and up to two extra levels for plant. Dividing the building into three distinct elements, at the height proposed, offers an effective solution to the building's form, offering an elegant addition to North Sydney's skyline that complements the commercial CBD's emerging, predominant character. This is reflected in the below diagram, taken from the submitted Visual Impact Study by Urbis, the diagram having been prepared by Woods Bagot, Architects, and the following image taken from Spruson Street Neutral Bay.



***Proposal within context of LEP-permitted and approved building heights.***





***Proposed building's envelope within the current CBD context, viewed from Spruson Street Neutral Bay***

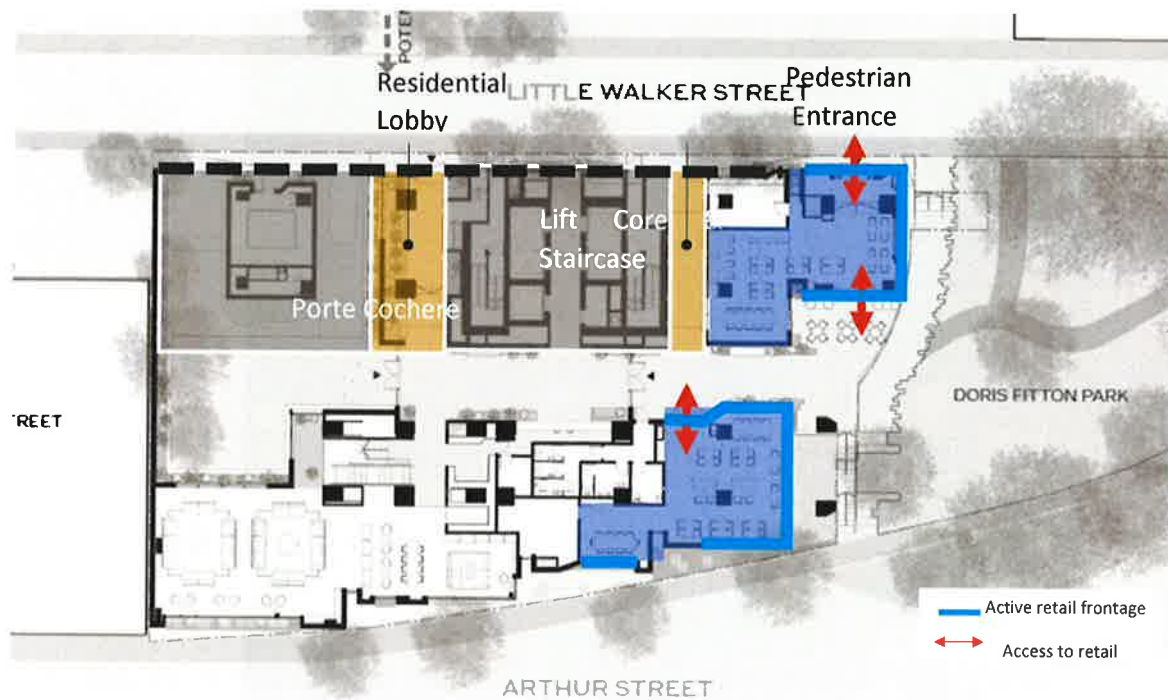
Use of glass and masonry in the façades does not offer any indication that the building is to be used for residential accommodation. Rather, coupled with the towering form, proposed use and distribution of materials renders it's intended use as unidentifiable. Large, glazed areas may be problematic, increasing heat loads on the building.

From an environmental impact perspective, the development does not overshadow parts of the CBD protected from being shadowed by new buildings, including the CBD's special (mapped public) areas, open space and residential zones adjacent to the CBD.

#### ***Limited active retail frontages along Little Walker Street***

The North Sydney CBD Public Domain Strategy identifies Little Walker Street as an opportunity for transformation into a vibrant shared zone, envisioned as a hub for new businesses, small retail tenancies, cafes, bars, and public art.

While the proposal incorporates an articulated podium form that achieves a fine-grain scale, the ground-level uses design elements that fall short in activating the street. A substantial portion of the frontage along Little Walker Street is occupied by a lift core, staircase, porte-cochere, residential lobby, and pedestrian entrance. This allocation leaves limited scope for active retail frontages, representing a missed opportunity to align with the site's prime CBD location and its proximity to the Victoria Cross Metro Station.



***Ground floor plan – with markup***



***View along Little Walker Street – podium façade with limited opening***

***It is recommended to revise the floorplan layout to maximise opportunities for active retail frontages along Little Walker Street, aligning with the vision of creating a vibrant and engaging streetscape.***

#### ***Lack of connection with Doris Fitton Park***

The site is situated directly south of Doris Fitton Park, offering a prime opportunity to leverage its excellent public domain frontage and views. However, the proposed design does not fully utilise this advantage. The restaurants facing Doris Fitton Park lack direct access to the park, with access instead provided through an internal link within the building, shown below. This design approach limits opportunities for outdoor dining areas that could extend into the park, thereby reducing the potential to effectively activate the public domain frontage and create a seamless indoor-outdoor dining experience.





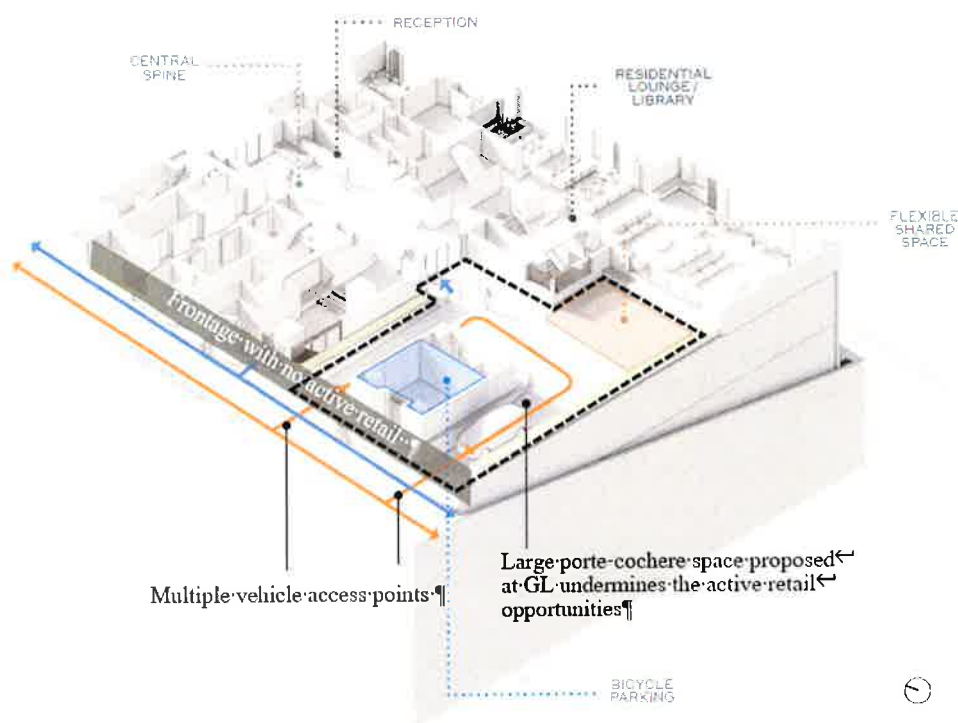
Doris Fitton Park

*View from Doris Fitton Park towards the proposed development*

***It is recommended to open up the ground plane towards Doris Fitton Park, establishing active and direct connections between the ground-floor retail spaces and the park. This approach would enhance opportunities for outdoor dining and improve the interface with the public domain.***

#### ***Multiple vehicle access point and their impact on the streetscape – Porte-cochere***

The proposal includes a porte-cochere space located at the southern end of the site fronting Little Walker Street, in addition to the main vehicle access point proposed along Arthur Street.



***Proposed porte-cochere location at Ground Level***

This porte-cochere raises significant design concerns:

- A large section fronting Little Walker Street with no active frontage, which undermines the potential to activate this future pedestrian-prioritised area.
- Multiple vehicle access points on Little Walker Street, in addition to the access on Arthur Street, create unnecessary pedestrian-vehicle conflicts, negatively affecting the streetscape and posing potential safety risks.

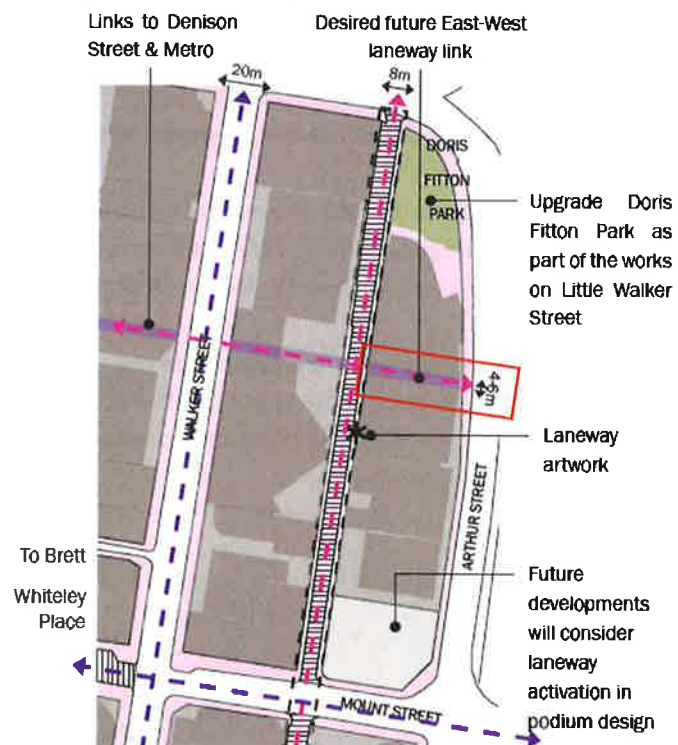
***To address these issues, it is recommended to reconsider the floorplan configuration to maximise active retail frontages along Little Walker Street and reduce vehicle access points. If temporary parking is required, it could be accommodated in Basement Level 1 or within a setback area on Little Walker Street (parallel parking), ensuring pedestrian activity and safety are prioritised.***

#### ***Lack of an east-west through-site link connecting Little Walker Street and Arthur Street***

The North Sydney CBD Public Domain Strategy (2020) identifies a network of laneways and through-site links within the North Sydney CBD. An east-west link, with a recommended width of 4-6m, is required at the southern end of 146 Arthur Street as part of this network (illustrated below).



***Laneways – NS CBD PDS 2020***



***Public domain interventions – NS CBD PDS 2020***

The current proposal does not include an east-west through-site link at this strategic location, which is critical to completing the strategic laneway network envisioned for the North Sydney CBD.

Instead, the proposal incorporates an internal north-west link connecting the porte-cochere to Doris Fitton Park. However, this link is not a public through-site connection with unrestricted 24/7 access. It features multiple access doors and is limited to residents within the building, functioning as an internal corridor rather than a publicly accessible link.

***It is recommended an east-west through-site link be provided at the southern end of the site, aligning with the requirements set out in the North Sydney CBD Public Domain Strategy. The proposal as it stands, fails to recognise and accommodate a strategically critical element of Council's vision for the CBD.***

1. *The floorplan layout be revised, to maximise opportunities for active retail frontages along Little Walker Street, aligning with the vision of creating a vibrant and engaging streetscape.*
2. *The ground plane be opened-up towards Doris Fitton Park, establishing active and direct connections between the ground-floor retail spaces and the park. This approach would enhance opportunities for outdoor dining and improve the interface with the public domain.*
3. *The floorplan's configuration be reconsidered, so as to maximise active retail frontages along Little Walker Street and reduce vehicle access points. If temporary parking is required, it could be accommodated in Basement Level 1 or within a setback area on Little Walker Street (parallel parking), ensuring pedestrian activity and safety are prioritised.*
4. *An east-west through-site link be provided at the southern end of the site, aligning with the requirements set out in the North Sydney CBD Public Domain Strategy.*

## TREE PROTECTION

The proposal requires the removal of 3 x mature canopy trees within the adjacent Doris Fitton Park. Council does not normally support removal of existing canopy trees for the purpose of development. The removal of these trees in concert with proposed works to the interface with the park, the proposed structure and public areas, may however improve the amenity of this largely underutilised space. Further improvements and contributions may be required to provide an optimum outcome for this public space, and the relevant Council department should be consulted to provide further recommendations being made.

As identified in the submitted Arboricultural Impact Assessment and Tree Protection Plan, T1-T4, *Platanus x acerifolia* (to 10m) planted in the Council verge on the Arthur St frontage will be subjected to >20% encroachment (where 10% = major impact), and T5 *Platanus x acerifolia* (11m) will be subjected to 16%. This degree of negative impact assessed by the arborist does not appear to have considered the further impact caused by proposed stormwater drainage, or any canopy impact from hoarding, scaffolding and other construction related works and infrastructure. A better outcome would be achieved by removing T1-T5, and replacing them with 5 x *Platanus x acerifolia* (150l min) across this frontage.

## TREE PROTECTION RECOMMENDATION

- 1. Submitted landscape and architectural plans be amended as required, to indicate that T1-T5, *Platanus x acerifolia* (identified by the report submitted with the EIS prepared by Endemic Tree Consultants, 17 March 2023) planted in the council verge on the Arthur St frontage shall be removed and replaced with 5 x *Platanus x acerifolia* (150l min) across this frontage. All trees shall be planted with sufficient awning cut-outs to allow for future unimpeded canopy growth if required, and be planted according to Council specifications, with 'Filtipave' rubber surround installed around the bases no sooner than 6 months post planting, with 150mm min. gap to trunk to allow for future trunk growth.***

Should consent be granted, additional standard conditions would be recommended for inclusion.

## TRAFFIC AND TRANSPORT

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

- Parking to be provided (66 spaces) is compliant, having fewer spaces than the maximum 259 spaces required by the North Sydney Development Control Plan 2013.
- Adequate accessible car and motorcycle parking is proposed.
- Bicycle parking/storage is proposed for 390 bikes, 39 less than the 429 required by the DCP.
- 5 motor cycle spaces are proposed, 2 less than required, which is acceptable being consistent with the reduced car parking.
- Although not a DCP requirement, no car share facility is proposed, which is a missed opportunity to reduce car usage, as encouraged by the Apartment Design Guide.
- Adaptable Units and Accessible Parking
  - o 20% of units adaptable (78 units), meeting DCP requirements.
  - o Accessible parking: 15 spaces (20% of total residential parking), compliant with AS4299-1995.
- 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 provisions and does not allow for user-feedback, for continuous improvement.

## **Site Access**

### **State Road Access (Arthur Street)**

- **Responsibility:** Access to Arthur Street, a state road and part of the arterial network connecting to the Warringah Freeway, falls under the authority of **Transport for NSW (TfNSW)**.
- **Proposed Access:** Retention of the **existing two-way driveway** on Arthur Street for light and service vehicles is supported by initial TfNSW consultation, which is noted.
- Arthur Street's ability to manage additional traffic with minimal impact on its level of service (LOS) is also noted.

### **Local Road Access (Little Walker Street)**

- **Laneway Functionality:** As a one-way, 6-metre-wide laneway with kerbside parking, Little Walker Street presents challenges for vehicle movements, particularly:
  - Drop-off and pick-up vehicle circulation.
  - Safety for pedestrians and cyclists in this high pedestrian activity zone.

### **Proposed Access:**

- A **3.6-metre entry** and **4.1-metre exit driveway** are proposed for light vehicles, these appear wider than required.

## **Construction Impacts**

Little Walker Street, as a 6-metre-wide laneway with kerbside parking and high pedestrian activity, is incompatible with construction activities of this type. Its limitations make it unsuitable for heavy vehicle movements, loading/unloading, and worker access. It is therefore recommended that all construction activities remain on Arthur Street (State Road) to maintain local amenity and safety.

## **Counterpoints to Construction Traffic Management Plan (CTMP) Justifications**

The CTMP proposes using Little Walker Street for light vehicle entry/exit and material handling. However, the following justifications are insufficient:

- **Claim:** One-way circulation minimises congestion.
- **Counterpoint:** Even one-way movement of construction vehicles could cause bottlenecks due to limited lane width and existing kerbside parking.

## **Green Travel Plan (GTP) Assessment**

While the GTP aligns with North Sydney Council's broader vision of promoting sustainable transport, it is currently insufficient for the following reasons:

### **Lack of Measurable Outcomes**

- The GTP consists primarily of broad objectives (e.g., encouraging walking, cycling, and public transport).
- It lacks specific, quantifiable measures or targets (e.g., percentage modal shifts, specific car reduction goals).

### **Shortfall in Requirements:**

- Critical items such as detailed end-of-trip facilities (e.g., lockers, showers) and sufficient bicycle parking are inadequately addressed.
- The proposed initiatives, while conceptually aligned with sustainable travel goals, fail to include actionable steps or timelines for implementation.

### **No Monitoring or Feedback Mechanisms:**

- The GTP does not outline processes for monitoring its effectiveness or adapting measures based on user feedback.
- It does not specify responsibility for implementation or ongoing management (e.g., Travel Plan Coordinator).



### **Recommendations for GTP Improvement**

To ensure the GTP can be effectively evaluated and implemented, the following actions are recommended:

#### ***Request Detailed Initiatives:***

- Require specific actions, such as:
- Defined bicycle facility upgrades, including sufficient parking to meet DCP standards.
- Commitment to car-share schemes or public transport subsidies for residents, for instance.

#### ***Stakeholder Engagement:***

- Encourage input from future residents, local businesses, and transport authorities to align the GTP with actual needs and expectations.

#### ***Introduce Measurable Goals:***

- Include measurable outcomes (e.g., 30% increase in active transport use within two years of occupancy).
- Specify timelines and responsibilities for each initiative.

#### ***Incorporate Feedback and Monitoring:***

- Establish a feedback mechanism to gather insights from residents and visitors.
- Require an annual review of the GTP's implementation, with adjustments made based on observed outcomes.

### **Conclusion, Traffic Assessment**

This development is ideally located close to key public transport hubs, including North Sydney Train Station and Victoria Cross Metro Station, offering a strong opportunity to reduce reliance on private vehicles. However, the Green Travel Plan (GTP) lacks clear, measurable targets and actionable steps, making it difficult to gauge its effectiveness in promoting sustainable transport. As site access is somewhat constrained, as discussed above, the design requires refinement, which should occur before approval is granted.

### **TRAFFIC AND TRANSPORT RECOMMENDATIONS**

1. ***Vehicle access arrangements are unacceptable as discussed above and should be improved before consent is granted.***
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 and these details:***
  - a) ***Detailed Initiatives:***
    - ***Require specific actions, such as:***
      - ***Defined bicycle facility upgrades, including parking to meet DCP standards.***
      - ***Firm commitments to car-share scheme or public transport subsidies for residents.***
  - b) ***Stakeholder Engagement:***
    - ***Encourage input from future residents, local businesses, and transport authorities to align the GTP with actual needs and expectations.***
  - c) ***Introduce Measurable Goals:***
    - ***Include measurable outcomes (e.g. 30% increase in active transport use within two years of occupancy).***
    - ***Specify timelines and responsibilities for each initiative.***
  - d) ***Incorporate Feedback and Monitoring:***
    - ***Establish a feedback mechanism to gather insights from residents and visitors.***
    - ***Require an annual review of the GTP's implementation, with adjustments made based on observed outcomes.***
3. ***Should consent be granted, standard conditions would be recommended for inclusion, to address:***

- a) *Driveway widths,*
- b) *No requests will be considered for loading or special parking zones,*
- c) *Compliance with relevant Australian Standards,*
- d) *Submission of a Construction Traffic Management Plan,*
- e) *No road network disruption, and*
- f) *Maintaining pedestrian and active transport access.*

## **WASTE MANAGEMENT**

Council's waste management team has reviewed the application, including architectural plans and the submitted operational waste management plan, and recommends the following minimum requirements, some may require amendment of architectural plans.

### **WASTE MANAGEMENT RECOMMENDATIONS**

1. *The bin storage room must be large enough for 8 x 1100L compacted waste bins and 14 x 1100L recycling bins. As these will not be provided by Council, the property must purchase 1100L bins.*
2. *Servicing twice per week. The bin room must be designed to access 1100L bins.*
3. *Property is to be serviced by onsite Council collection using Council's 12.5m HRV with a height clearance of 4.5m. The applicant is to ensure sprinkler heights and service ducts are taken into consideration. A swept path for a 12.5m HRV with a 4.5m height clearance is to be provided.*
4. *A Private Contractor will have an availability charge payable to Council per unit in addition to private collection contractor costs.*
5. *Properties with a lift must have a garbage chute and 240L recycling bin on each level or dual waste/recycling chutes.*
6. *Space must be provided for a 120L food waste bin on each level.*
7. *A functional bulky waste storage area to hold household clean up material is required. This should be separate from the garbage room.*
8. *Commercial bins must be separate from residential bins.*

## **CONCLUSION**

In conclusion, Council appreciates the opportunity to make this submission and the prior consultation of the applicant with Council's staff.

Given the grounds for objection hinge upon adverse and irreversible economic and social impacts and the project's inherent conflict with the Government's own and Council's strategic planning, economic and social objectives, approval the application cannot be supported.

Should approval be recommended to and subsequently granted by the Independent Planning Commission, further involvement in project planning and engagement is positively anticipated, via preparation of conditions, as examined herein.

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](mailto:jim.davies@northsydney.nsw.gov.au).

Yours sincerely



MARCELO OCCHIUZZI  
DIRECTOR, PLANNING & ENVIRONMENT

