



1 October 2025

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

SSD 61400212  
D339/2024/01  
JD6 (P&E)

ATTENTION: Mr J Groundwater, Senior Planning Officer, Key Sites Assessments

**STATE SIGNIFICANT DEVELOPMENT APPLICATION 61400212  
APPLICANT: THIRD.1 GROUP**

Dear Secretary,

I refer to the Department's recent request for Council to provide further comment in respect of the applicant's 'response to submissions' package.

Please find attached a table which summarises key issues and Council's feedback regarding the applicant's amendments to the application.

For reasons outlined therein, Council maintains its concerns with design aspects of the proposed development, principally due to the project not satisfying the Housing SEPP and Apartment Design Guide objectives regarding building separation between tall residential towers, and related design criteria.

Continued failure to observe these design guidelines is undermining the credibility of the State's planning framework, by compromising the amenity it is designed to deliver, which should not occur in the strategically important Crows Nest TOD precinct. This rapidly growing precinct should reflect high standards of design which the TOD framework had advocated.

Council appreciates the opportunity to make this further submission.

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,

A handwritten signature in blue ink, appearing to read 'DAVID HOY'.

David Hoy

**A/SERVICE UNIT MANAGER DEVELOPMENT SERVICES**

**North Sydney Council Response to RTS  
25 Hume St Crows Nest Site B OSD**

**Attachment 1 - SSD-61400212**

**The following response to Issues raised by Council and Applicant's response is provided**

<i>Issue: Inadequate setbacks and poor articulation of shared property boundary and street frontages.</i>	
<b>Applicant's Response</b>	<b>Council's Comment</b>
<p>Increasing setbacks is not viable, for structural reasons.</p> <p>Additional horizontal articulation has been avoided to maintain "clarity".</p> <p>Rotating façade planes has provided depth and relief.</p> <p>Apartments are angled southwards to optimise views and further articulate street-facing façades.</p>	<p>The DPIE is advised to review structural advice to confirm the voracity of this claim. Poor urban design outcomes arising from engineering "constraints" should not be accepted without better alternatives being fully explored</p> <p>Independent Structural engineering advice should be sought.</p>

<i>Issue: Non-compliant building separation to the southern adjacent site and Non-compliant building separation to the site across Clark Lane.</i>	
<b>Applicant's Response</b>	<b>Council's Comment</b>
<p>Building separation can be achieved except to the southern boundary, noting structural limitations and the concept approval inform or limit design, the latter having been determined before the recent doubling of height on adjacent land permitted by the TOD rezoning.</p>	<p>Refer comment above regarding structural limitations.</p> <p>The diagrams in Appendix D2 rely on neighbours increasing their setbacks to the site for levels above 25m, to achieve ADG separation objectives. This is unlikely to be realised and remains unacceptable. The ADG promotes equidistant setbacks either side of a site boundary to achieve suitable separation.</p> <p>Where envelopes have been approved for commercial towers, conversion to residential use of towers requires changes to the approved envelopes to be considered. This has not been sufficiently explored for Site B.</p> <p>Recent changes made to planning frameworks, to promote greater housing within the TOD precinct necessitates an alternate approach be considered for the approved envelopes to accommodate anticipated yield for adjoining sites.</p> <p>The applicant has not sought to do this at the expense of designing poor quality residential apartments.</p> <p>The inadequate building separations to the south and across Clarke Lane have not been satisfactorily addressed. This will create dark, low amenity apartments for a significant portion of the tower and future apartment towers, and create a 17-27 storey "wall of towers" along the Pacific Highway;</p>

**North Sydney Council Response to RTS  
25 Hume St Crows Nest Site B OSD**

*Issue: Poor interface of parking levels with the site to the south.*

Applicant's Response	Council's Comment
<p>Future development on adjoining land must have regard for the existing concept (and subsequent detailed application, assuming approval).</p>	<p>Development of all sites within the Precinct is expected to consider and reasonably accommodate or not impinge upon development capability of adjoining land under applicable planning controls.</p> <p>The amended design adds a third car parking level (Levels 5–7), maintaining almost no setback to the shared southern boundary. Previous Urban Design advice raised concerns that these open-façade (featuring perforated metal panels) car park levels directly interface with the adjacent site, which is planned for redevelopment with a 3-storey street wall and residential uses above.</p> <p>The nil-setback interface would directly overlook future residential units, negatively impacting privacy, noise, air quality, and visual amenity. The additional level in the amended design worsens these effects and further reducing the residential amenity of the adjacent site.</p> <p>A three-storey car park that reaches up to level 7 is an entirely inappropriate design and land use above a metro station, where employment, population serving activities, additional housing or community facilities would be more appropriate.</p>

*Issue: FSR/GFA underestimated due to exclusion of residential corridor spaces.*

Applicant's Response	Council's Comment
<p>Corridor-width has been narrowed and included in GFA/FSR calculations. Areas outside lifts remain excluded from calculations, because they "remain open".</p>	<p>The applicant's approach is not correct at law. This response does not explain how the "excluded" areas are required for vertical circulation, to allow their exclusion. The proponent has not adjusted the tower envelope to achieve the required ADG building separation.</p> <p>To remain within the maximum FSR control and avoid exceeding the GFA, the previous Level 7 residential uses have been replaced with an additional car parking level seemingly to avoid non-compliance with FSR requirements, while retaining the overall tower height.</p> <p>This approach is not supported.</p> <p>It appears that the proponent has attempted to reduce the floor space ratio (FSR) of the building without addressing the acute need for greater above podium setbacks by swapping apartments for car parking. This represents a poor outcome on a site identified for design excellence by the NSW Government. It is also contrary to the fundamental principle of transit-oriented development as it will facilitate greater use of trips by private vehicle.</p>

**North Sydney Council Response to RTS  
25 Hume St Crows Nest Site B OSD**

	<p>The built form now comprises above ground car parking on levels 5, 6 and 7, that will directly face future residential apartments. This is an inappropriate land use above a metro station where employment, population serving activities, additional housing or community facilities would be more appropriate.</p> <p>The landscaped recess has been reduced, resulting in a bulkier, less articulated podium fronting key public domain along Hume Street outside the metro station that is inconsistent with advice from the State Design Review Panel.</p>
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*Issue: Replanting of street trees required.*

Applicant's Response	Council's Comment
Replacement of trees is expected to be addressed by a condition of consent.	Council requests that the Department include such a condition in approval of the application.

*Issue: Only 100 bike spaces are provided, 147 are required.  
No car wash bays are provided.*

Applicant's Response	Council's Comment
Plans have been amended to provide parking for 156 bikes.	Noted, increased bike storage has been included in revised architectural drawings.
The original consent did not require car wash bays.	Car wash bays could still be provided, as per ADG guidelines, via a condition of consent.

*Issue: Queuing of vehicles to access the car lift is unacceptable*

Applicant's Response	Council's Comment
No more than two cars will queue at any time according to the traffic engineer's response to submissions. The likelihood of cars waiting to use the car lift will be "very low". "No parking" zones along Clarke Lane allow cars to stop for up to two minutes and there is enough space for a vehicle to manoeuvre around waiting cars. Warning lights and signs can be used to inform drivers on Clarke Lane a vehicle is to exit the car lift.	Vehicle queuing in the lane is potentially unresolvable given the reliance on car lifts and the number of parking spaces seeking to use lifts (esp. in peak periods). The impact on peak hour movements over seven floors has not been adequately considered, noting the increase in parking numbers. The solution would be to reduce off street parking numbers to minimise the need for queuing during peak periods.

**North Sydney Council Response to RTS  
25 Hume St Crows Nest Site B OSD**

*Issue: Compliance with waste management requirements.*

Applicant's Response	Council's Comment
<p>The operational waste management plans have been updated to satisfy requirements.</p>	<p>That the architectural plans have been amended to allow on site collection from areas within the loading dock, complemented by bulk waste and bin storage (including FOGO and recyclables) and a general waste chute on all floors, separate from commercial waste facilities, is noted. A condition should ensure implementation of the revised waste management plan.</p> <p>Laneway waste collection must not be accepted for this site given access to the off street loading dock.</p> <p>Vehicle access arrangements must be reviewed to ensure adequate design to enable waste collection and loading vehicles to operate wholly off the laneway itself.</p> <p>Consideration should be given to requiring restricted height vehicles as the existing station box envelopes do not permit standard waste vehicles to access the loading dock.</p>

*Issue: Provision of community infrastructure, to assist with the growth in population*

Applicant's Response	Council's Comment
<p>The social locality is generally well serviced with social infrastructure.</p>	<p>The Amended SIA is not supported.</p> <p>It is anticipated that the development will place substantial additional strain on already pressed local infrastructure, and when multiple developments come into being in the TOD precinct, the precinct will experience compounded impacts.</p> <p>The omission of community-focused infrastructure in the TOD development represents a significant missed opportunity to replace aging facilities in Crows Nest and meet current local needs, let alone to meet the needs of an increasing population.</p>

*Issue: Provision of a communal space with a capacity of 30 – 50 people.*

Applicant's Response	Council's Comment
<p>Outdoor rooftop spaces and the ground floor lobby provide for informal meeting spaces.</p>	<p>The spaces available do not offer the same amenity and functions as a common room would, as recommended by Council.</p> <p>The amended SIA has nominated the lobby area and the rooftop communal area for spaces - Neither of these are dedicated as spaces area acceptable space for communal gathering which can also be offered to members of the public to promote social connection in and around Crows Nest.</p>

**North Sydney Council Response to RTS  
25 Hume St Crows Nest Site B OSD**

**Issue:** 5% of units be provided as affordable rental housing in perpetuity.

Applicant's Response	Council's Comment
<p>Affordable housing is proposed in the form of Specialist Disability Accommodation. A planning agreement is under consideration by the Department.</p>	<p>It is acknowledged that the site is in the base rate area for affordable housing and that the proposed provision is likely to exceed the 3% contribution required (or equivalent thereof, in dwellings). However, the consent authority is also required to consider cl. 7.5 (4) of the North Sydney LEP 2013, which requires consideration of the 'affordable housing principles' for the precinct, for consent to be granted. The principles include:</p> <ul style="list-style-type: none"> <li>- Affordable housing must be managed to accommodate a diverse residential population and maintain continued use as affordable housing,</li> <li>- Rent does not exceed a benchmark income of 30%, and</li> <li>- Affordable housing being built to a standard the same as dwellings not proposed as affordable housing, in the consent authority's opinion.</li> </ul> <p>Time limited social and affordable housing and cash contributions to a registered Community Housing Provider equivalent of 5% of approved residential gross floor area, are an underwhelming response to a housing affordability crisis.</p> <p>Council reiterates that ideally, 15% of the total number of dwellings should be dedicated in perpetuity for 'affordable housing'. A minimum of no less than 5% be managed by a Tier 1 Community Housing Providers (CHP) operating in NSW.</p>



## REFERRAL COMMENTS – STRATEGIC PLANNING

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**TO:** [REDACTED]

**FROM:** [REDACTED]

**DATE:** 26/09/2025

**DA No:** DA339/2024/1 SSD-61400212

**SITE:** 25 Hume Street CROWS NEST 2065  
SSD-61400212 - Crows Nest OSD Site B Proposed over station mixed use and residential development comprising of: 122 Residential units and 78 above ground car spaces

### PURPOSE

To provide urban design comments on the amended Development Application (SSD-61400212) – Crows Nest Metro OSD Site B (dated 19 August 2025). This advice should be read in conjunction with advice prepared in November 2024.

### URBAN DESIGN COMMENTS

The Site B over station development (OSD) occupies a strategic and prominent location directly above the Crows Nest Metro station box, acting as an important gateway to the Crows Nest Village precinct. Its proximity to Crows Nest Village requires the design to establish a well-considered relationship with this community hub, respecting its local character while supporting the growth of the precinct.

In November 2024, the Crows Nest TOD rezoning introduced significant increases in density beyond what was planned under the NSW Government’s previous “2036 Plan”. These changes fundamentally reshape the precinct’s context and set new expectations for future development. Accordingly, Site B needs to carefully respond to this changing environment, particularly with respect to the dense cluster of future residential towers on adjacent sites along Clarke Lane and Pacific Highway (Figure 1).

In addition, given the site’s significance and the scale of change introduced by the Crows Nest TOD rezoning, the development must demonstrate a high standard of architectural, urban design and landscape design. This requirement is clearly outlined in the planning framework for the site under amendments introduced by the NSW Government.

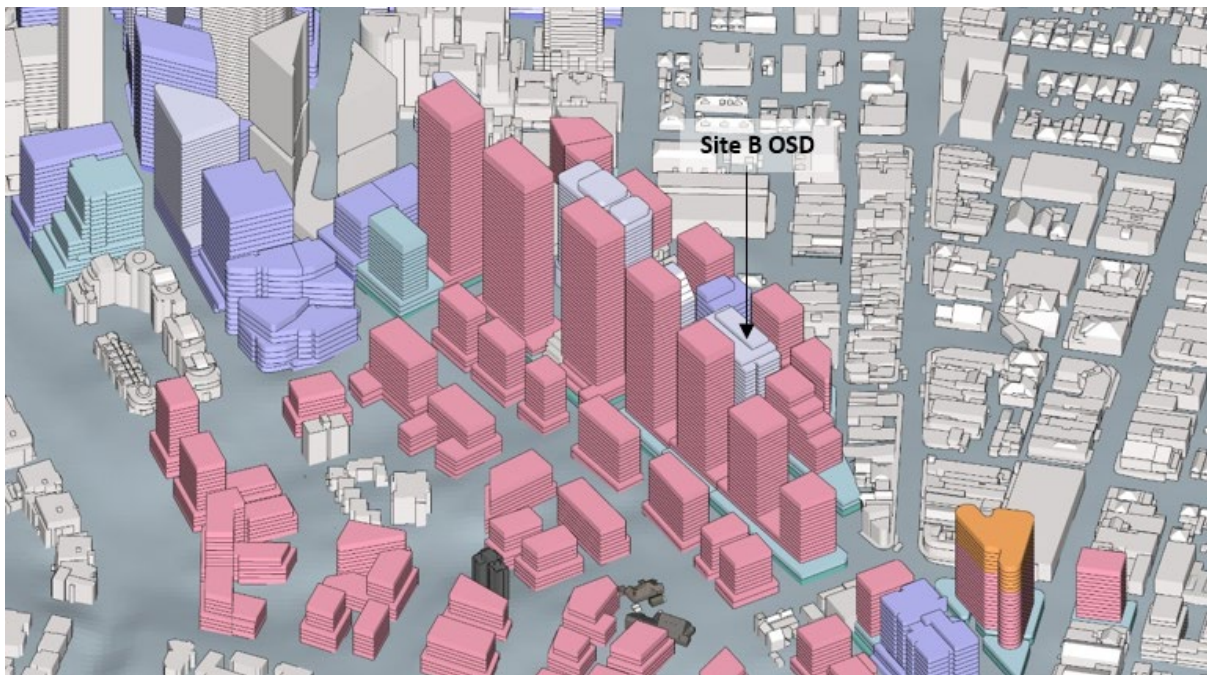


Figure 1. Proposed Crows Nest TOD uplift (source: 3D model provided by DPHI)

Specifically, clause 6.19B addresses design excellence in the area adjacent to Crows Nest Metro Station, and applies to Metro Sites A, B, and C. It states\* (in part) that:

*6.19B(4) In considering whether the development **exhibits design excellence**, the consent authority must have regard to the following matters – ...*

*(f) how the development addresses the following matters— ...*

*(ii) existing and **proposed uses and use mix**, ...*

*(iv) the relationship of the development with other development (existing or proposed) on the same site or on neighbouring sites in terms of **separation, setbacks, amenity and urban form**,*

*(v) **bulk, massing and modulation** of buildings, ...*

\*Emphasis added

The amended design clearly falls short of the above requirements:

- An additional level of above ground car parking has been introduced. The built form now comprises of above ground car parking on levels 5, 6 and 7, that will directly face future residential apartments. This is an entirely inappropriate land use above a metro station where employment, population serving activities, additional housing or community facilities would be more appropriate;
- The wholly inadequate building separations to the south and across Clarke Lane have not been addressed. This will create dark, low amenity apartments for a significant portion of the tower and future apartment towers, and create a 17-27 storey “wall of towers” along the Pacific Highway;
- The landscaped recess has been reduced, resulting in a bulkier, less articulated podium fronting key public domain along Hume Street outside the metro station that

is inconsistent with advice from the State Design Review Panel.

It appears the proponent has attempted to reduce the floor space ratio (FSR) of the building without addressing the acute need for greater above podium setbacks by swapping apartments for car parking. This is an extremely poor outcome on a site identified for design excellence by the NSW Government. It is also contrary to the fundamental principle of transit-oriented development as it will facilitate greater use of trips by private vehicle.

In light of these issues, this urban design advice reinforces the critical need for the Site B OSD to achieve an appropriate land use mix and appropriate bulk, massing and articulation.

## DETAIL

### 1. Inadequate above podium setbacks and articulation of shared property boundary and street frontages

1.1 The approved Concept OSD design (SSD-9579) includes building envelope diagrams indicate both the **maximum building envelope** and the **indicative OSD building location** with a smaller floorplate and above podium setbacks along all property boundaries. The amended design for Site B continues to disregard the approved indicative OSD location. Instead, it fills the maximum building envelope with no above podium setbacks and minimal articulation.

1.2 The proposal remains inconsistent with North Sydney Development Control Plan (NSDCP) 2025, which requires a 3 m above podium setback along Pacific Highway, Hume Street, and Clarke Lane to maintain a human-scale streetscape and reduce visual bulk.

### 2. Poor building separations to the adjacent site to the south and east

2.1 The tower envelope has not been amended, and the separation to the southern site and to the eastern site remains non-compliant with Apartment Design Guide (ADG) minimum requirements.

	Setback - <b>Application</b>	Setback - <b>ADG</b>	<b>Compliance</b>
<b>South (along Pacific Hwy)</b>	5.4-6.3m	12m	No
<b>East (Clark Lane)</b>	6m (to centreline of Clark Lane)	12m	No

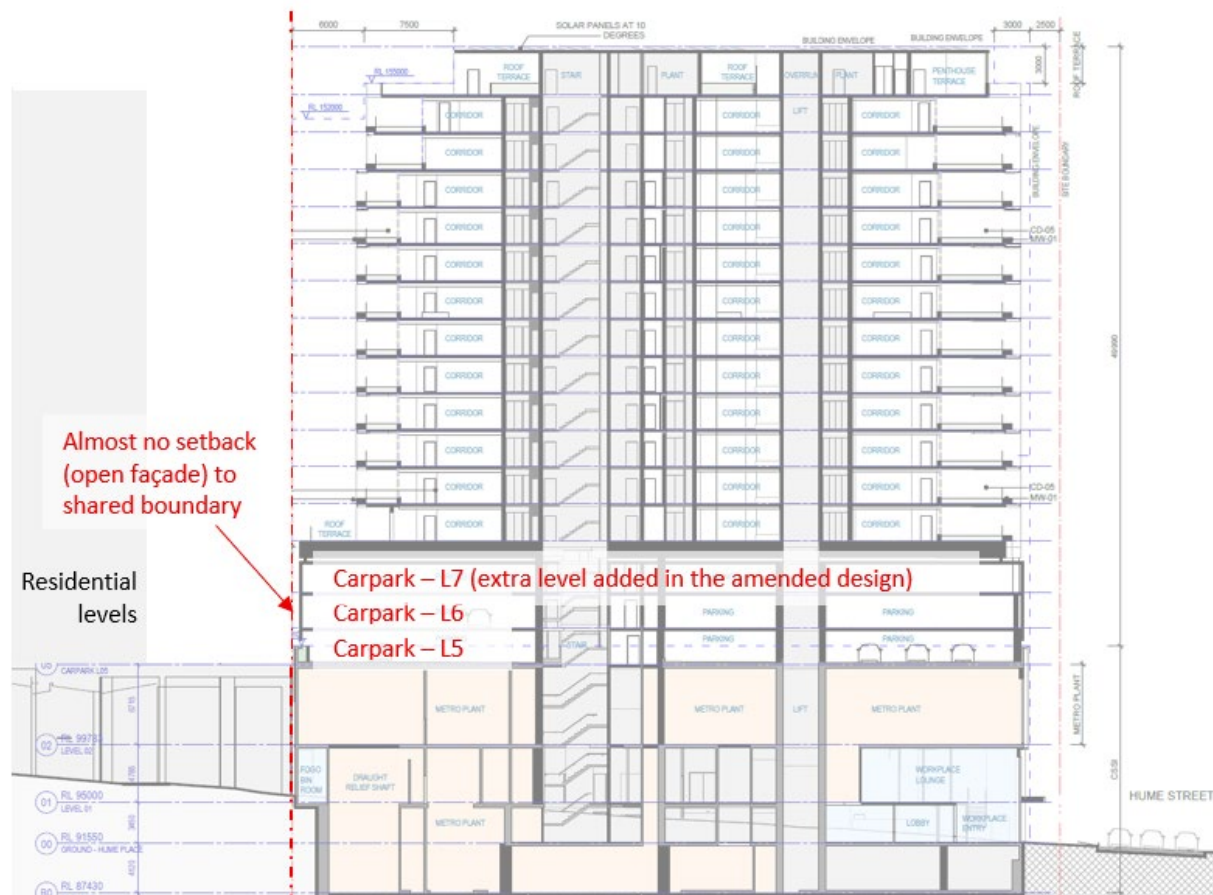
2.2 Previously, the applicant argued that smaller setbacks based on an 8-storey height limit for adjacent sites. However, the Crows Nest TOD rezoning has increased the allowable heights for the adjacent southern site to 16 storeys and the eastern site to 18 storeys, indicating a total recommended 24 m separation above 8 storeys (12 m each side).

- 2.3 Section 3.7 Design Excellence of the Crows Nest TOD Design Guide specifically requires that the relationship of a development with existing or proposed neighbouring sites, regarding separation, setbacks, amenity, and urban form be carefully considered. This requirement is incorporated into the NSLEP 2013.
- 2.4 The proposed narrow separation from the southern site along Pacific Highway will exacerbate bulk, overshadowing, and create a continuous wall-like effect that will be highly visible from local viewpoints along the highway.
- 2.5 The proposed non-compliant setback on the eastern side to Clark Lane significantly compromises urban scale, privacy, amenity, and overall design quality for future residents on both sites.
- 2.6 The insufficient setbacks may imply a reliance on the adjoining properties' setbacks to achieve separation, which is problematic. This approach lacks certainty in delivering a high-quality urban design outcome and poses a significant risk to both public and private amenity over the long term. It also sets an undesirable precedent for future high-rise development within the precinct.
- 2.7 The applicant claims that providing additional setback along Clark Lane would affect the structural integrity of the station and OSD. However, column alignment is not the only solution. Misalignment can be addressed through structural measures such as transfer structures or local strengthening.

Given the prominent site location at the Crows Nest Metro Station and the significant high-density increases planned in the precinct under the Crows Nest TOD, achieving high-quality design that minimises impacts, as outlined in the Crows Nest TOD Design Guide's design excellence objectives, should take priority over structural cost efficiency.

### **3. Poor interface with adjacent site to the south for carparking levels**

- 3.1 The amended design adds a third car parking level (Levels 5–7), maintaining an almost no setback to the shared southern boundary. Previous Urban Design advice raised concerns that these open-façade (featuring perforated metal panels) car park levels directly interface with the adjacent site, which is planned for redevelopment with a 3-storey street wall and residential uses above.



3.2 The nil-setback interface would directly overlook future residential units, negatively impacting privacy, noise, air quality, and visual amenity. The additional level in the amended design worsens these effects, further reducing the residential amenity of the adjacent site.

3.3 A three-storey car park that reaches up to level 7 is an entirely inappropriate land use above a metro station where employment, population serving activities, additional housing or community facilities would be more appropriate.

#### 4. Amended GFA/FSR calculations

4.1 The amended design has revised the GFA calculation in response to Council's earlier comments. Corridor areas previously omitted are now partly included, with approximately two-thirds of these spaces counted towards the GFA. This adjustment is supported.

4.2 To remain within the maximum FSR control and avoid exceeding the GFA, the proponent has not adjusted the tower envelope to achieve the required ADG building separation. Instead, Level 7 residential uses have been replaced with an additional car parking level,

allowing the proposal to stay within the FSR limit while retaining the overall tower height. This approach is not supported.

4.3 The assigned FSR is intended to manage bulk and scale, ensuring compliant separation and amenity outcomes, not to justify additional car parking at the expense of addressing excessive bulk. The amended scheme provides 122 units (less than the previous 130) yet still introduces an extra car park level. This fails to resolve building separation and amenity concerns, while also increasing amenity impacts and discouraging sustainable, green travel.

## 5. Unjustified extra car parking level and the related impacts

5.1 The amended design replaces residential units with car park spaces on Level 7, increasing the total spaces from 55 to 78.

### Unnecessary increases in car park spaces discourage sustainable travel

5.2 Several considerations regarding car parking requirements for the Crows Nest Metro OSD have previously aimed to encourage sustainable travel:

- **Approved OSD Controls (SSD-9579)**  
In 2020, approval was granted for a maximum of 55 spaces for Site B and 46 for Site A
- **2036 Plan and Crows Nest TOD**  
The St Leonards & Crows Nest Precinct Strategic Transport Study and the Crows Nest TOD Design Guide recommend a minimalist approach to car parking for developments near high-capacity public transport.
- **Crows Nest Site A OSD SSDA** (currently at the 'Response to Submissions' stage)  
Provides no on-site parking and includes a Car Parking Strategy that demonstrates the development can operate effectively without on-site parking, reducing traffic impacts and supporting sustainable travel.
- **Crows Nest Site B OSD – Transport and Accessibility Impact Assessment**  
Confirms that measures to encourage walking, cycling, and public transport are essential, and supports a maximum of 55 spaces, as achieved in the earlier two-level design.

5.3 The proposed increase to 78 car spaces, including an additional car park level, is not justified. It exceeds the approved maximum, does not align with the State Government's objectives for minimal parking near high-frequency public transport, and undermines sustainable travel initiatives.

### Amenity impacts of the amended car park design

5.4 The SDRP panel previously recommended a clearly defined, landscaped recess between

the car park podium and the tower to reduce visual bulk. This setback was intended to create a recessive, darker element that visually separated the car park from the tower above, softening the building's appearance and improving public domain amenity.

- 5.5 The amended design does not address these recommendations. According to the Structure Design Change report, the car park walls have been pushed outward to align with new perimeter columns and a transfer wall supporting the Level 08 transfer structure. As a result, the landscaped zones have been reduced.
- 5.6 The landscaped soil area around the car park podium has been reduced from 288 m<sup>2</sup> in the previous design to 188 m<sup>2</sup>. This reduces the depth of the recessed landscaped setback and removes the landscaped buffer along Hume Street.
- 5.7 While structural concerns are acknowledged, the reduction in the recess and landscaping compromises key design outcomes previously supported by the SDRP. The extra car park level and shallower setback make the podium appear as a continuous six-storey mass, rather than a distinct transitional element. This increases perceived bulk, reduces visual separation between podium and tower, and detracts from a human-scaled, high-quality streetscape.

A revised design that provides adequate setbacks to surrounding built form will also create an opportunity to improve this interface with Hume Street.



# MEMORANDUM

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**TO:** [REDACTED]  
**FROM:** [REDACTED]  
**CC:** [REDACTED]  
**DATE:** 19 September 2025  
**RE:** Major Projects – Crows Nest OSD Site B (SSD-61400212) - Response to Further Information

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## Background

The Thirdi Group Pty Ltd has followed up with Council, regarding the above mixed-use development at 447, 479 and 491-495 Pacific Highway, Crows Nest, over the new Crows Nest Metro Station (the project). The Thirdi Group are keen “to work with Council to ensure any outstanding matters are resolved and that Council’s objection can be withdrawn..”.

The project is a State Significant Development. I note that Elizabeth Griffin, Principal at Griffin Planning, has responded to Council’s comments and concerns as raised in the Social Impact Assessment, and has reiterated her arguments regarding the project’s social needs. Griffin Planning is standing by their assumption in the SIA, that the social locality is generally well serviced with social infrastructure. Council staff are not convinced by what has been reported. This development will place additional strain on already pressed local infrastructure, and when multiple developments come into being in the TOD precinct, the precinct will experience compounded impacts.

## Social Impacts in and around Crows Nest

The proposed development intensifies population density in a small geographic area, and within it, there is limited scope to expand the footprint of services. The focus on housing yield and proximity to transport overlooks opportunities for community infrastructure and overloads services, schools, community facilities, child care, access to public infrastructure and amenity etc, already operating at / or near capacity and in need of renewal. Without spaces for gathering, recreation, and support, social disconnection is inevitable. Vulnerable, lonely, isolated people and groups rely on such services and will be disproportionately affected. Affordable housing must be purposefully included and protected in perpetuity, not assumed to emerge from market forces.

## Pressure on Schools

Schools are intensified by the population density proposed. The NSW Department of Education School Infrastructure has a timeline of four phases to deliver school infrastructure: Planning – Design - In progress – Complete. The new primary school in St Leonards is listed as in phase 1 – Planning<sup>1</sup>. According to recent media statements, both the St Leonards and Chatswood schools “are no longer being pursued by the current state government”. The alternative has been to intensify usage on existing school sites, which is no substitute for appropriate school spaces and play areas. For example, Council parks are being increasingly used by schools for sports, play and lunch breakout locations, due to lack of campus space. It is Council’s understanding that the existing Cammeraygal High School is at capacity and is sending local students to Mosman High<sup>2</sup>.

## Affordable Housing

Council referenced studies showing that thousands of affordable bed spaces have been lost in the LGA since 1984. To maintain even 2016 levels, thousands of new affordable dwellings are needed by 2036. Time limited social and affordable housing and cash contributions to a registered Community

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1 <https://www.schoolinfrastructure.nsw.gov.au/projects/s/st-leonards-new-primary-school.html#about-project-tab>

2 <https://northsydneyliving.com.au/new-north-shore-public-schools-been-scrapped/>

Housing Provider equivalent of 5% of approved residential gross floor area, are an underwhelming response to a housing affordability crisis. Council reiterate that ideally, 15% of the total number of dwellings should be dedicated in perpetuity for 'affordable housing'. A minimum of no less than 5% managed by a Tier 1 Community Housing Providers (CHP) operating in NSW.

### **Disadvantaged Communities**

Griffin Planning (Crows Nest Over Station Development Site B - Response to North Sydney Council's Submission: p.2) agrees with 'Council's proposition, that "disadvantaged community members, such as those from culturally and linguistically diverse backgrounds, people with mental health issues, people experiencing homelessness and the elderly will likely experience negative impacts to a higher degree due to the vulnerabilities they experience in their lives." This statement is consistent with the conclusions presented in the SIA (page 40).' They go on to cite that "research demonstrates that the social locality is generally well serviced with infrastructure". They give the example of the Crows Nest Centre offering services to the multicultural community and activities for seniors. In fact, strategic reviews and plans of the Crows Nest Centre reveal challenges tied to both building limitations and service sustainability based on such issues including:

- As an aging asset, the Crows Nest Centre building lacks the capacity to support expanded or inclusive services without significant refurbishment.
- Loss of Federal funding to services for culturally and linguistically diverse communities.
- Impact of Aged Care Reform: Federal reforms to aged care funding are expected to reduce income and support for services like Meals on Wheels, home visiting, and assisted transport.
- Financial deficits due to increased servicing pressures.

The omission of community-focused infrastructure in the TOD development represents a significant missed opportunity to replace aging facilities in Crows Nest and meet current local needs, let alone to meet the needs of an increasing population.

### **Communal Space**

Griffin Planning notes "Council's suggestion that a communal space be included in the Project to accommodate 30-50 people to support community development. The Project includes a rooftop communal area of 287 sqm with a pool, spa, outdoor kitchen and seating areas to provide a pleasant place for residents to connect and build social relationships. The lobby area of 108 sqm on ground level also offers space for small groups to meet and interact". Neither of these are dedicated as spaces which can also be offered to members of the public to promote social connection in and around Crows Nest.

### **Conclusion**

While there is some acknowledgement of issues and some improvements, the applicant's response is underwhelming.

For your consideration.



**Community Worker - Social Planner**