NORTH SYDNEY COUNCIL

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27 October 2025

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

SSD-82599709
D109/2025/1
JD6 (P&E)

ATTENTION: Nicholas Beck, Planning Officer

STATE SIGNIFICANT DEVELOPMENT APPLICATION 82599709
153-157 WALKER STREET NORTH SYDNEY
MIXED USE DEVELOPMENT
FREECITY NORTH SYDNEY DEVELOPMENT PTY LTD

Dear Secretary,

I refer to the public exhibition of the subject State Significant Development Application proposing a mixed use development at 153-157 Walker Street North Sydney. Following a review of available documents Council offers the following advice to assist the Department to refine and improve design and compliance of the proposed development.

In summary, our advice addresses:

- The proposal to effectively replace commercial development with a building predominantly proposed as residential accommodation, may have cumulative, long-term impacts economic and social impacts on the North Sydney Centre, and its role as a key commercial district of the metropolitan area.
- The proposed building envelope is derived from the commercial building approved by the Land and Environment Court, in August 2024.
- Although the tower's width and depth have been slightly reduced and is of a different shape, the building separation provided (side setbacks) above the podium are insufficient for permanent residential accommodation.
- Review of several other elements of the design is recommended.
- The proportion of affordable housing is very low, at 3%, and should be increased to at least 10% of the building's gross floor area.

DETAILED SUBMISSION

Detailed commentary and advice follow. This submission has been prepared with input from across Council's departments, and addresses the following matters:

- Strategic Planning,
- Urban Design,
- Affordable Housing,
- Development Assessment,

- Tree Protection,
- Traffic and Transport, and
- Waste Management

Draft conditions have been prepared and are attached, addressing these and related topics.

Council's Advice

Council urges the Department to consider the advice provided below, and to encourage the applicant to revise the development accordingly.

STRATEGIC PLANNING

North Sydney CBD's established employment role in the North District will be permanently undermined
Rezoning land for residential use within the North Sydney CBD poses a significant threat to its established role as a strategic employment centre in the North District. **It risks permanently undermining decades of coordinated planning and investment by both State and local government** and will have adverse consequences for the local and regional economy.

<u>Coordinated strategic planning and infrastructure is needed</u>

North Sydney CBD has long been identified as a key commercial centre to be protected within the Greater Sydney Region by State and local government. This is reflected in several major policy documents and infrastructure investments:

- **Sydney Metro City Line Investment**: In 2016, the NSW Budget committed $16.2 billion to the Sydney Metro City line, including the new Victoria Cross Metro Station in North Sydney. This infrastructure was designed to enhance access to the CBD and support its commercial growth.
- **Greater Sydney Region Plan (2018)**: The Plan designates North Sydney CBD as part of the Harbour CBD within the Eastern Economic Corridor, reinforcing its role in the broader metropolitan economy. The Plan explicitly states that (p.102 emphasis added):

  "*maintaining a long-term supply of office space is critical to maintaining Greater Sydney's global economic role, and <u>should not be compromised by residential development</u>.*"
- **North District Plan (2018: p.56)**: The District Plan reinforces the above and highlights the importance of protecting and growing North Sydney's commercial core, noting its prominence in the Greater Sydney office market.
- **North Sydney LEP Amendments (2018)**: In response to the Region Plan, Council initiated an amendment to the NSLEP 2013 that increased height limits in the CBD to accommodate an additional **30,000 jobs**, aligning with State employment targets of **76,000–81,500 jobs** by 2036. Specifically, the subject site at 153–157 Walker Street saw its height limit raised from RL 155m to RL 215m to support future job growth near the new Metro Station.
- **North Sydney Local Strategic Planning Statement (2020: p.5)**: With the support of the State government, the Statement reaffirms the intent to retain the CBD's commercial core zoning, restricting residential development to peripheral areas to preserve employment capacity.

As the population is set to increase, State and local government should continue to work together to ensure the North Sydney CBD remains a high-performing employment centre. Its retention is essential to ensure access to jobs for Sydney's growing population and to sustain the regional economy.

<u>The importance of retaining commercial uses on Walker Street</u>

Walker Street is a **principal commercial corridor in the North Sydney CBD**, lined with major office towers that support economic growth and employment. It features some of North Sydney's tallest and most modern office buildings, offering premium-grade workspace. Several approved commercial tower developments will further reinforce its role as the city's primary business address.

- **Economic and employment value:** Walker Street offices support a significant number of jobs and generate significant economic activity. Retaining commercial uses will help preserve the precinct's role as an employment hub.
- **Strong transport accessibility:** The proximity to Victoria Cross Metro Station, North Sydney Station and other transport links provides excellent access for workers and clients, reinforcing its strategic value.
- **Preventing commercial fragmentation:** Introducing residential or non-commercial uses would break up the commercial corridor, reduce office capacity, and weaken the overall CBD's business appeal.

Walker Street is the backbone of North Sydney's commercial district. Retaining its commercial use and character is essential for employment, economic growth, and long-term planning outcomes. In particular, 153 - 157 Walker Street should remain commercial, as converting it to residential or mixed-use would disrupt the corridor's continuity, weaken the employment base, and conflict with the strategic vision for the CBD.

<u>Impact of Sydney Metro has yet to be fully realised</u>

The full economic impact of the opening of the Victoria Cross Metro Station in 2024 is yet to be realised. The Station has already demonstrated strong usage, with 752,749 average annual trips—**15% higher** than the average for other stations in E2 Commercial Centre zones (TfNSW, 2025). This indicates robust demand and connectivity, supporting the CBD's continued viability as a commercial hub.

There is clear, strategic merit in preserving the E2 Commercial Centre zone for commercial uses and observing how the Metro can be fully leveraged to support the NSW economy.

<u>Permanent loss of employment capacity on the subject site</u>

Rezoning the subject site for residential use would result in the **permanent loss of significant employment capacity** in the North Sydney CBD. This change would undermine the site's current and potential contribution to the local economy and contradict strategic planning objectives aimed at preserving commercial land for high-value employment.

The subject site currently accommodates **38 active businesses**, primarily operating in **knowledge-intensive sectors** such as law, marketing, finance, architecture, and software development. These industries are critical to North Sydney's role as a strategic employment centre.

Council's internal modelling and data from Economy.id (2025), indicate the current buildings:

- Support approximately **715 direct jobs**
- Contribute an estimated **$228 million in Gross Value Added (GVA)** annually
- Generate an additional **342 indirect jobs** through their operations

The site's approved commercial scheme (DA-393/22), if constructed, would significantly enhance the site's economic output (based on approved NLA, Council modelling and Economy.id):

- Supporting **4,084 direct jobs**
- Contributing an estimated **$1.4 billion in GVA** annually
- Generating an additional **2,190 indirect jobs**

This scheme aligns with State and local strategic planning to substantially increase the site's employment and economic capacity.

In contrast, the current proposal for a residential tower would significantly reduce the site's employment contribution, with data from Urbis (2025) suggesting it will:

- Support only **108 direct jobs** once operational
- Contribute an estimated **$10.6 million in GVA** annually
- Generate just **18 indirect jobs**

- Create **352 temporary construction jobs** over a 1.5-year period

While construction jobs offer short-term benefits, they do not offset the long-term economic loss associated with converting the site from commercial to residential use.

The difference in employment and economic output between the commercial and residential scenarios is stark. The proposed rezoning would result in a **net negative** for the North Sydney economy and is inconsistent with the principle of **orderly and economic use of land**.

Although the commercial redevelopment was not proceeded with due to a lack of financial viability in 2024, this decision reflects **contemporaneous market conditions**. Market dynamics are fluid, and rezoning the site now would **irreversibly eliminate its potential to support future employment growth**.

Contrary to the applicant's assertion that retaining the site's commercial zoning is a passive "do nothing" approach, it is **a strategic planning decision** that preserves long-term employment capacity, supports the co-location of firms and labour markets, and ensures the North Sydney CBD continues to function as a productive and competitive contributor to the regional economy.

The proposed residential rezoning represents a **permanent forfeiture of strategic employment land**, and should be reconsidered in light of its long-term economic consequences.

Cumulative adverse impacts of rezoning commercial land on the North Sydney CBD

Allowing the proposal to proceed will have **significant and lasting adverse impacts** on surrounding commercial properties and the broader functioning of the CBD. These impacts are particularly concerning given the strategic importance and spatial constraints of the area.

North Sydney's E2 zone comprises just **2% of the LGA's total land area**, yet it is responsible for approximately **$24 billion in annual economic output**, equating to **3% of NSW's Gross State Product** (Economy.id, 2025). Within this zone, the CBD supports over **50,000 employees on just 15 hectares.**

Unlike the City of Sydney, Parramatta, and other spatially large commercial centres, proposals that withdraw commercial stock in North Sydney will have **a disproportionately large impact** on the centre's services, workforce and economic productivity.

There are currently **eight State Significant Development Applications (SSDs)** lodged via Build-to-Rent (BTR) and Housing Delivery Authority (HDA) pathways that would displace a substantial portion of the North Sydney LGA's commercial floorspace, leading to:

- Displacement of **224 existing businesses**
- Loss of approximately **5,000 existing jobs**
- Reduction in productivity, with an estimated **loss of $1.5 billion** in GVA per annum
- Loss of planned capacity for **21,500 future jobs**, achievable through compliant commercial schemes
- Foregone future productivity, with billions lost to the local economy each year.

These changes will **permanently erode established business agglomerations**, disrupt economic networks, and diminish the CBD's strategic function.

The first of these SSDs has now already been approved for **146 Arthur Street** by the Independent Planning Commission (IPC) (IPC decision 9 October 2025). This means that the recent planning reforms are already set to lose approximately **600 existing jobs** and associated output of **$187 million** per annum in the CBD (Figure 1). The loss of planned capacity is significantly larger again.

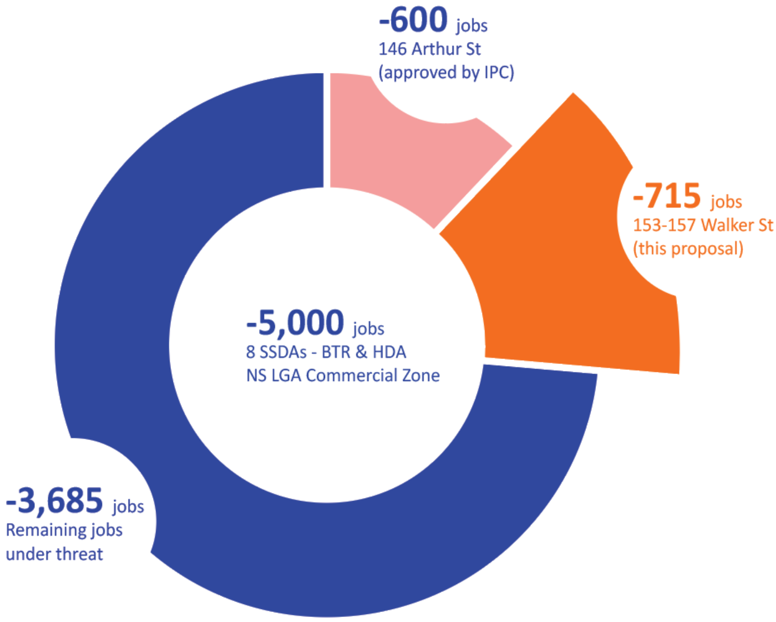

Figure 1. An estimated 5,000 knowledge-intensive jobs are currently under threat from eight SSDs in the North Sydney LGA, representing an estimated loss of $1.5 billion in GVA per annum, at time of writing

More broadly, the continued conversion of commercial land to residential use will also:

- Reduce the attractiveness of surrounding sites for commercial redevelopment
- Complicate leasing and renewal of commercial tenancies, as interface issues between residential and commercial uses emerge
- Discourage future investment in commercial floorspace, undermining long-term economic resilience.

70% of the North Sydney LGA is already zoned for residential use. Additional residential uplift is planned through the:

- **Crows Nest TOD Accelerated Precinct**, delivering **5,900 new dwellings**
- **Low to Mid-Rise Housing Reforms**, which enables further intensification of residential land

Given these existing and planned residential opportunities, the **loss of commercial land within the E2 Commercial Centre zone cannot be strategically justified**. The North Sydney CBD's commercial function is essential not only to the current economy but also to the future population's access to employment.

Review of the proponent's Economic Impact Assessment

The proponent has not adequately addressed the SEARs requirement to:

"*Consider any economic impacts, including employment, on the North Sydney CBD that may be caused by the use of the development site moving from Commercial Premises to Residential Accommodation/Hotel uses*".

While the Economic Impact Assessment quantifies the economic output of the proposed development, it **fails to account for the displacement of existing commercial activity**. The analysis omits critical considerations such as the:

- Number of existing businesses and jobs that will be displaced
- Loss of Gross Value Added (GVA) from existing and planned commercial capacity
- Broader impact on agglomeration economies and commercial viability in the CBD
- Interface issues that will reduce the attractiveness of the CBD for other commercial investment

In addition, the justification for changing land uses relies on **questionable and selectively framed forecasts**, including:

- **Vacancy Rate Projections**: The assessment references forecasted vacancy rates to 2035 based on supply, investment, and employment demand. However, these projections **omit absorption rates**, misrepresenting pipeline Net Lettable Area (NLA) as vacant or underutilised space rather than a sign of sustained investment in commercial infrastructure.
- **Post-Pandemic Work Trends**: The rise of remote work is used to suggest commercial GFA is redundant. The proponent draws parallels to past downturns (e.g., the 2008 GFC and early 2000s dot-com crash) but **fails to acknowledge the recovery periods** that followed. In reality, demand for commercial space has **evolved, not disappeared**.
- **Housing Shortfall Claims**: The proposal asserts that the North Sydney LGA will exceed employment targets but face a shortfall of ~3,380 dwellings by FY2029. This figure is derived by subtracting current residential approvals from the National Housing Accord target. However, this method is **misleading**, as it ignores future approvals and existing residential capacity across the LGA.

*The proponent's Economic Impact Assessment does not meet the SEARs requirements and relies on **incomplete analysis and questionable assumptions** to justify a significant land-use change. A more rigorous, independent evaluation is necessary to fully understand the economic implications of the proposal and to ensure that planning decisions are based on.*

AFFORDABLE HOUSING

The number of proposed affordable dwellings is low, at 3% of the units proposed and building's gross floor area. Under SEPP Housing 2021, Build to Rent Housing must be provided (assuming the planning proposal submitted with the subject SSDA is approved) and occupy a minimum of 10% of a proposal's gross floor area to qualify and be permitted as "infill affordable housing" (cl. 15C (1) (b), Housing SEPP). Per cl. 15C (1) (a), the development would be permitted as shop top housing in the E2 zone, per Chapter 3 Part 4 of the Housing SEPP, and per cl. 15C (c), the development is in an "accessible area" (subject to confirmation).

To qualify as infill affordable housing, GFA to be used as affordable housing must be increased. The proposed building has a gross floor area of 50,926m^2.

Given 10% GFA is the minimum to be used as affordable housing, 10% of the building's GFA is 5,092m^2. Adopting a modest unit size of say 75m^2 would yield 68 units.

> ***Recommendation***
> That the development should be revised to ensure that at least 10% of the building's gross floor area is used for affordable rental housing, as defined by SEPP Housing 2021. Although the provision of affordable housing is not enforceable, the developer providing same would go some way toward ensuring a more adequate supply of affordable housing in North Sydney Centre and the LGA, whilst also providing community and social benefit from approval of the concurrent planning proposal.

INCONSISTENCY WITH HDA SSD CRITERIA

It is noted that before a project can be recommended by the HDA to be declared a SSD, expressions of interest (EOIs) are assessed against criteria that accord with the objectives of this process to determine whether they should be recommended to become an SSD. One of the objectives of this process is to "complement the State Significant Rezoning Policy" by providing a potential pathway for major housing proposals that are seeking concurrent rezoning.

With regards to "Objective 2 – Identify projects that can be assessed quickly", one of the criteria is "has addressed any previously refused proposal". This criterion requires the "Applicant positively addresses any reasons for refusal if development is based on a previously refused or stalled application/planning proposal/land and environment court appeal." There is also a note that "any proposal that is already being considered under another pathway will not be declared as State significant until the applicant withdraws from that pathway."

It should be noted that 153-157 Walker Street is subject to an undetermined planning proposal with Council. The Planning Proposal seeks new office floorspace by proposing a site-specific clause in the NSLEP 2013 that enables an increase in the building height from RL 215m to RL 238m. Council issued a request for information letter to the applicant on 14 November 2024 with a response still pending.

Furthermore, it should also be noted that the site received an approval for DA393/22 by the Land and Environment Court on 16 August 2024 for demolition of two office buildings and associated works and removal of trees, and construction of a 43-storey (RL234) commercial building, including a five-level basement with parking and associated works.

Given the undetermined planning proposal and recently approved development application, it is considered that the subject proposal does not meet the above objective and criteria to be recommended by the HDA to be declared an SSD.

Inadequate documentation for the 'concurrent re-zoning' resulting in procedural concerns.

The SSD is accompanied by a concurrent rezoning proposal to permit the accommodation of 'Shop Top Housing' as an additional permitted land use at the site under the *North Sydney Local Environmental Plan 2013* (NSLEP 2013).

By allowing a concurrent rezoning through the SSD process, the proposal bypasses the planning proposal process. For example, it is noted that the "Guidance for Concurrent Rezoning Report: SSD Housing" provides the requirements for applications for concurrent rezonings accompanying SSD Housing applications. These requirements replace the requirements in the DPHI's "Local Environmental Plan Making Guideline" which are more detailed and set a clearer expectation on what should be submitted.

Concerns are raised regarding the inadequacy of the documentation provided with the application, particularly compared to what would normally be required for a planning proposal written in accordance with the DPHI's "Local Environmental Plan Making Guideline".

Furthermore, the proposal has not been subject to a Gateway Determination, which is a checkpoint for a planning proposal to review strategic and site-specific merit and determine whether the planning proposal should proceed to public exhibition. Concerns are therefore raised regarding whether procedural fairness has occurred to ensure the proposal has been thoroughly assessed prior to public exhibition.

Given the concurrent rezoning is not through the planning proposal process, it is also unclear what mechanism is proposed to amend the NSLEP 2013, and clarification is requested.

Urban Design

Building envelope will result in low amenity apartments and adversely impact commercial towers.

Introducing residential towers into a dense commercial core heightens, not lessens, the need for good setback controls. The ADG building separation controls are minimum standards that safeguard daylight, privacy, ventilation, outlook and wind conditions, while managing the residential/commercial interface between tall towers. In a built-up CBD, tighter setbacks would amplify overshadowing, direct overlooking, and operational impacts on adjoining commercial buildings, and would **erode the centre's long-term viability**. Accordingly, non-compliances with ADG minimum setbacks are not supported and should not be relaxed on the basis of the CBD context.

Inadequate building separations will result in economic and amenity impacts

The proposed building setbacks **fall significantly short** of the minimum requirements set out in the Apartment Design Guide (ADG) and are therefore not supported. The key areas of non-compliance are outlined below:

Interface	Proposed setbacks	ADG controls	Complies
North (161 Walker Street)	3m (3.5m weighted)	12m	**No**
East (146 Arthur Street*)	6.2m (6.7m weighted)	12m	**No**
South (141 Walker Street)	6m (7.5m weighted)	12m	**No**

**Note: 146 Arthur Street, located across Little Walker Street to the east, is a commercial site with a recently approved build-to-rent SSD proposal.*

The future character and strategic intent of the North Sydney CBD is currently in flux, having regard to the recent permissibility of BTR and influx of mixed-use proposals via the HDA pathway, introducing uncertainty around appropriate built form outcomes. Despite this, an **underlying urban design principle** should be to **minimise the adverse impacts of residential towers** on the CBD's commercial viability. In this context, stronger consideration of ADG separation requirements should be considered.

Introducing a residential tower with **inadequate setbacks** in a commercial centre is inappropriate and would result in:

- **Economic impacts** to surrounding commercial towers, including view loss and diminished investment appeal.
- **Amenity impacts** to future residential developments, including overshadowing, loss of privacy, reduced daylight access, and compromised outlook.
- **Strategic impacts**, as reduced setbacks may **deter future commercial development** on adjacent sites, undermining the CBD's long-term land use objectives and strategic vision.

Recommendation
The proposal should be reviewed and amended as necessary to ensure consistency with the ADG building separation design objectives.

Failure to meet ADG for solar access and core circulation

The proposal fails to meet key ADG requirements for solar access and core circulation, resulting in significant impacts on residential amenity and building performance. These substantial shortfalls and non-compliances are unacceptable and cannot be supported. In particular:

- **Solar Access**: **25% of apartments receive no sunlight** between 9am-3pm in mid-winter. This significantly exceeds the maximum 15% ADG requirement. Improvement of this performance should be considered.
- **Core Circulation:** The development proposes **49 apartments per lift core**, exceeding the ADG maximum of 40, raising concerns around safety, access, and amenity.

These deficiencies underscore the inappropriateness of introducing high-density residential development within a CBD environment primarily designed for commercial use. The non-compliances also stem from insufficient building separation as discussed above, reinforcing the need for a more context-sensitive and compliant built form. Accordingly, Council considers the proposed development unsuitable for the site and inconsistent with both the ADG and the strategic intent for the North Sydney CBD.

Recommendations
The following setbacks be revised taking into consideration the ADG Design Objectives for building separation:

- The northern tower setback should be a minimum 12.0m, at least above 25m building height, if not the whole tower,

- The 4.0m tower setback to Little Walker Street should be increased to improve separation with the approved development opposite, at 146 Arthur Street, and
- The southern tower setback should be a minimum 12.0 metres, at least above 25m building height if not the whole tower.

<u>Inconsistent streetscape elements will diminish the quality of the public domain.</u>

While the 4m setback along Little Walker Street is acceptable, the 4-storey podium height is not supported as it does not provide a consistent and contextually appropriate street frontage. Specifically, the:

- **NSDCP 2025** requires **2–3 storey podium heights** to Little Walker Street and zero setbacks to all street frontages. The proposal includes a 4-storey podium recessed over two levels with a 4m setback, which does not comply with these requirements.
- proposed podium height is **inconsistent with the scale of adjoining development** envisioned in the NSDCP 2025 and limits the opportunity to achieve a human-scale street interface, particularly within the narrow laneway and at the park frontage.

A **reduced podium height of 2–3 storeys** is required to align with planning controls and deliver a more consistent, context-sensitive streetscape.

<u>The arcade link lacks clear wayfinding and public sightlines</u>

While the landscaping design introduces greenery along the proposed arcade link between Walker Street and Doris Fitton Park, the **current design lacks clear wayfinding** for the public, limiting its effectiveness as a pedestrian connection. Specifically:

- A **2.3 m-wide sliding door** is proposed at the Little Walker Street end of the arcade (Figure 2). Its alignment with the surrounding glass façade creates an enclosed frontage, which does not highlight this key access point. The **lack of a prominent, legible opening** discourages pedestrian movement through the link.

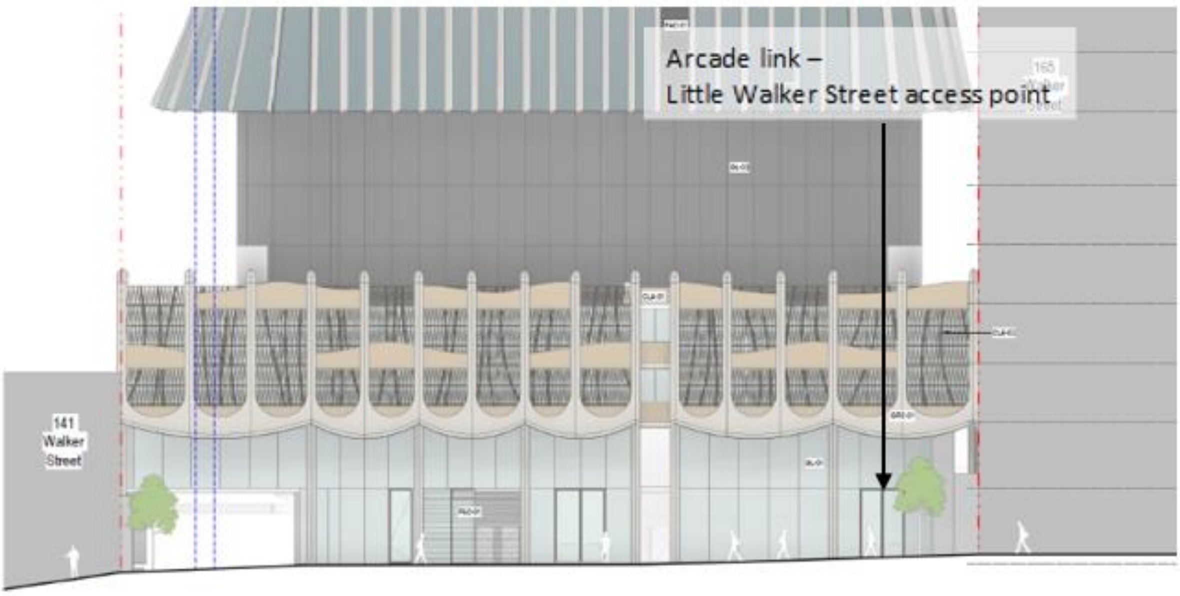

Figure 2. Little Walker Street Elevation with indistinguishable arcade link

- A hotel lobby with a café is proposed at the Little Walker Street end, but the **café is located entirely indoors,** missing the opportunity to activate the **outdoor setback area**. Opening up this corner and incorporating **outdoor dining or seating** would better activate the link and improve wayfinding.

These suggested changes would enhance the arcade's contribution to the public domain and support a more accessible, welcoming pedestrian environment.

<u>The design provides little population serving floor space</u>

The cumulative impact of recent SSD proposals in the North Sydney LGA is a growing concern. Collectively, these developments will deliver over **2,300 new dwellings**, accommodating approximately **4,700 new residents**. However, **none of the proposals to date provide substantial population-serving floor space** to support this increase in population. This presents a serious risk to the functionality of the CBD.

The current proposal includes:

- **296 residential units** and **164 hotel rooms**, significantly increasing demand for social infrastructure and local services.
- Just **174m² of retail space**, representing **only 0.3% of the total proposed GFA**.
- **No commercial office space or community facilities**, despite the high proportion of residential accommodation.

This imbalance in land uses will increase reliance on **off-site facilities**, many of which are already housed in commercial buildings now proposed for conversion.

With multiple SSDAs proposing to replace commercial towers with residential uses, the cumulative effect will:

- **Displace population-serving functions** such as health, education, childcare, and cultural spaces.
- **Increase pressure on existing infrastructure**, open space, and community services.
- **Undermine Council's strategic directions**, which aim to support inclusive, connected, and culturally vibrant communities.

Notably, both the ***Social Inclusion Strategy (NSC, 2025*****)** and the ***Culture and Creativity Strategy (NSC, 2025)*** call for:

- "New and improved public and community spaces for people to meet and connect."
- "An increase in places and spaces available for cultural and creative participation and production."

The current proposal does **not include any community or cultural spaces**, and therefore fails to support these strategic objectives.

The absence of population-serving floor space cumulatively across SSD proposals reflects a **systemic gap in planning outcomes**. While housing delivery is a State priority, it must be accompanied by **adequate infrastructure and services** to ensure liveability and long-term sustainability.

Without intervention, the North Sydney CBD risks becoming a **residential enclave without the necessary social, cultural, and economic supports**, a model that is inconsistent with the principles of good urban governance and integrated planning.

> ***Recommendation***
> The proposal should include an appropriate amount of population serving floorspace.

DEVELOPMENT ASSESSMENT

As detailed above, the key concern is the tower not allowing sufficient setbacks to acceptably reduce development capability of adjoining land and to provide reasonable levels of amenity, in the high-density, high-rise CBD context. Further reducing the towers girth would improve daylight access and the visual impact of the building, and its compatibility with existing and approved development, and future development in accordance with the local planning framework.

Built Form

Recessed podium to expand the public domain

The podium is recessed on Walker Street and Little Walker Street, extending the public domain into the building's footprint to create safe pedestrian areas. This is similar to the Court approved development and is deemed to be acceptable, as are the other podium setbacks.

The residential tower

The architectural plans available from the major project webpage did not have a plan for level 8 – according to the EIS level 8 is a residential level, similar to levels 9-14.

> ***Recommendation***
> A floor plan for level 8 be included in the plans before determination of the application.

TRAFFIC AND TRANSPORT

The following advice is from Council’s Transport Engineers:

Car Share

Given that the proposal includes a hotel component and a high number of apartments, consideration should be given to incorporating dedicated car share spaces within the development to support sustainable transport outcomes and reduce private vehicle demand.

> ***Recommendation***
> Consideration be given to providing conveniently located, dedicated car-share spaces in the basement car park.

Loading and Servicing

The development proposes one MRV and one SRV loading bay. This does not comply with Council’s requirements for residential development, which require either a minimum of one HRV bay or two MRV bays dedicated solely to residential servicing.

The submitted traffic impact assessment notes that a loading management plan, including a booking system, will be implemented to ensure deliveries occur by appointment. However, this still does not satisfy residential servicing requirements. Furthermore, the proposed loading dock is intended to be shared between multiple land uses, including hotel and retail, which is not considered appropriate for the development, and may result in operational conflicts.

> ***Recommendation***
> Loading facilities be amended to provide a minimum of one HRV bay or two MRV bays dedicated solely to residential servicing.

Car parking

The proposal contemplates 11 levels of private basement parking. Given the site’s highly accessible location and the applicant's justification being the sites high level of accessibility, the parking should be substantially reduced.

Recommendation

The amount of car parking should be reduced to align with Council's DCP rates for high accessibility areas.

CONCLUSION

In conclusion, Council appreciates the opportunity to provide this advice. 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