

GRIFFIN PLANNING

40 Anglo Street
CHATSWOOD NSW 2067
P: 0408 484 620
E: liz@griffinplan.com.au

ABN: 73 033 787 439

30 July 2025

Anna Limnios
Development Manager
Third.i
53 Hume Street
Crows Nest NSW 2065

Dear Anna,

Re: Crows Nest Over Station Development Site B - Response to North Sydney Council's Submission

Thank you for referring to me, North Sydney Council's submission in relation to SSDA 61400212, dated 12 December 2024. As requested, I have considered the matters raised by Council in relation to the Social Impact Assessment (SIA) report prepared by Griffin Planning, dated October 2024.

In general, I appreciate the input from North Sydney Council, and I am grateful to Council for providing some information in their submission which is not publicly available. I have considered the matters raised by Council and provide the following response to each of the issues raised. My response is presented under the headings in Council's submission for ease of reference.

Page 15 - Social impact assessment assumptions

First dot point: North Sydney Council states that an "underlying assumption of the SIA is that the social locality is well serviced with social infrastructure." This statement is incorrect. The SIA makes no such assumption. The SIA aims to establish the impact of the Project on existing social infrastructure in the social locality. It presents the findings of research into the social infrastructure that was available in the social locality at the time of writing. That research demonstrates that the social locality is generally well serviced with infrastructure.

Second dot point: Council claims that there is a need for two primary schools and a high school to service the needs of the LGA. This statement is referenced to a document prepared by the NSW Teachers Federation. I have obtained a copy of this document but can see no specific reference to specific school needs in Crows Nest or North Sydney LGA and question how Council has reached this conclusion. Regardless, the Department of Planning, Housing and Infrastructure's *SIA Guideline* makes clear that it is not the responsibility of the SIA to predict the school needs of the North Sydney LGA. The SIA is only to focus on the school needs generated by the Project including the impacts to existing schools and the need for

additional school places in the social locality. As reported in the SIA, (page 32) the need for additional school places as a result of the Project and other development in the St Leonards Crows Nest Precinct has already been examined. The NSW Government has indicated that a new primary school will be needed and a new primary school is in the planning phase for a nearby site in St Leonards.

Third dot point: Council identifies a number of disadvantaged groups in the community. In general, I agree 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). Council's statement that the SIA *"makes an assumption that these groups are not disproportionately represented in the social locality"* is not supported. As noted below, the data reviewed from the ABS 2021 Census clearly indicates that these groups are not disproportionately present in the social locality. I agree with Council's statement that *the housing crisis and lack of affordable housing in Crows Nest and North Sydney is not simply solved by boosting housing supply*. The SIA makes no such suggestion.

Page 16 – Social impacts in and around Crows Nest

1. Childcare: I appreciate the information provided by Council and agree that in general, there is a growing need for affordable and accessible childcare throughout Greater Sydney, including the North Sydney LGA. The data on childcare needs provided in Council's submission relates to the whole of the North Sydney LGA when the SIA is concerned with impacts to childcare located within the social locality. The social locality includes the suburbs of Crows Nest, Greenwich, St Leonards, Wollstonecraft, Naremburn and Royal North Shore Hospital and extends beyond North Sydney LGA. Allowing for the different geographic areas of interest, the information in Council's submission appears to be generally consistent with the information on childcare availability in the social locality as presented in section 4.3.1 of the SIA. In particular, the limited childcare options for 0-2 year olds in the social locality was noted on page 29 of the SIA.
2. Culturally and Linguistically Diverse (CALD) backgrounds: I agree with the statements by Council that CALD communities can experience language barriers and issues relating to cultural sensitivities. The SIA notes on page 23 that when compared to the Greater Sydney region, the social locality has an average proportion of population born overseas and a below average proportion of people who speak a language other than English at home. It also states that these groups are slightly more highly represented in the social locality when compared to the North Sydney LGA. While we accept Council's comment that there are no specifically funded multicultural services in the vicinity of the project, the SIA notes on page 37, that services for CALD communities are available at the nearby Crows Nest Community Centre which offers English conversation classes, homework help, employability workshops, Japanese and Spanish speaking mothers groups, Chinese seniors groups, Persian morning tea and a Bollywood music group. The Community Centre also offers a referral service to other services the area. As to Council's statement that there are limited meeting spaces in the vicinity of the project, I note that in addition to the meeting spaces available at the Crows Nest Community Centre, the recently opened St Leonards Library, located in the Lane Cove LGA, offers five meeting or training rooms, some with flexibility capacities. It is my view that there are adequate meeting spaces in the social locality when facilities in both North Sydney and Lane Cove LGAs are considered.

3. People with mental health issues: I accept the comments by Council in relation to people with mental health issues and note the trend that mental ill-health is generally an increasing trend. However, I question the ability of the proponent or the Project to make any meaningful contribution to addressing mental health beyond the proposal supporting healthy lifestyles and being well located in terms of provided access to mental health services.
4. People experiencing homelessness: I agree with the general statements made in relation to homelessness and the solutions to address homelessness in the community. The project will contribute to these solutions through the provision of a cash contribution to a registered Community Housing Provider, equivalent to a minimum of 5% of approved residential gross floor area.
5. The elderly: Consistent with Council's comments, the SIA notes on page 23, that there has recently been a substantial increase in older people in the social locality and North Sydney LGA. Council suggests that the SIA ought to consider the older population in retirement villages and social housing located in Milsons Point and Kirribilli. The James Mason Village and Greenway social housing are located around three kilometres to the southeast of the site and social locality. I have considered the boundary of the social locality in the context of these comments from Council. However, I stand by the social locality as defined in the SIA as accurately reflecting extent of the potential direct and indirect social impacts during construction and operation of the project. Given the nature and scale of the Project, I do not accept that project impacts could extend to Kirribilli or Milsons Point. I note that there are a range of services for older people in Kirribilli and North Sydney including social groups and classes run from the North Sydney Community Centre.

I support Council's comment that the older population need opportunities to age in place as described in the submission. I consider that the housing provided by the Project will be consistent with the types of housing that Council considers is needed to support older people aging in place. The Project will deliver quality accommodation in a building that offers communal spaces and is close to public transport and support services. The provision of communal spaces within the project will provide opportunities for social engagement and community participation. A number of activities for seniors are available at the nearby Crows Nest Community Centre.

6. Open Space: I agree with the comments in Council's submission regarding the community's views on open space needs. This was reported on page 16,17 and 18 of the SIA. As noted in the SIA, the project is subject to a voluntary planning agreement between North Sydney Council, Sydney Metro and The Minister for Planning and Public Spaces made on 16 June 2021. That agreement establishes a monetary contribution for Site B of \$2,265,601.63. That contribution may be used by North Sydney Council to:
 - *acquire land for the provision of public facilities or **open space** or*
 - *attend to the **embellishment of land** for public facilities or **open space** or*
 - *care for and **maintain facilities** or **open space** or*
 - *for another public purpose within the North Sydney Local Government Area which the Council considers suitable. (my emphasis)*

I consider that the above contribution will enable Council to go some way to addressing the community's concerns in relation to open space.

Page 17 – Council’s role in affordable housing

I note the information provided by Council and I am aware that North Sydney Council has been a leader in the delivery of affordable housing over an extended period. The proponent has agreed to:

- Provide affordable housing on Site B, equivalent to a minimum of 5% of the residential gross floor area, to be managed by the Nominated Community Housing Provider and used as Affordable Housing (which may include Specialist Disability Accommodation insofar as it is offered and used in accordance with the definition of Affordable Housing).
- Ensure the dwellings, nominated as Affordable Housing are managed as Affordable Housing for a minimum of ten years from the date on which the first Occupation Certificate is issued

The proposed provision of affordable housing is consistent with Conditions A13 and A14 of the development consent for the Concept SSDA (SSD 9579).

Page 17 – Conclusion

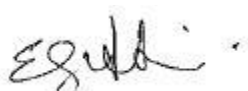
I note Council’s suggestion that a communal space be included in the Project to accommodate 30-50 people to support community development. The Project includes a rooftop communal area of 287 sqm with a pool, spa, outdoor kitchen and seating areas to provide a pleasant place for residents to connect and build social relationships. The lobby area of 108 sqm on ground level also offers space for small groups to meet and interact.

Council’s concluding remarks on affordable housing have been addressed above.

Further Information

Should you wish to discuss the contents of this correspondence please contact me 0408 484 620 or liz@griffnplan.com.au.

Yours sincerely



Elizabeth Griffin
Principal
BA(Geog) MURbPI MPIA